

## **Policy Forum – Accommodation on Release from Prison**

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**June 2019**

The Criminal Justice Alliance (CJA) is a coalition of over 150 organisations – including charities, voluntary sector service providers, research institutions and staff associations – working across the criminal justice pathway. The Alliance works to achieve a fairer and more effective criminal justice system which is safe, smart, person-centred, restorative and trusted.

This briefing is the result of a round table event on 21 May 2019 organised by the CJA and Ministry of Justice for a group of CJA members to discuss the accommodation challenges faced by people leaving prison. Attendees were asked to focus on three key questions:

- *How can we increase timely access to post-release accommodation?*
- *What opportunities are there to better link housing and employment?*
- *What does good quality accommodation look like for different cohorts of prison leavers (such as women, young adults, older people and people with mental health or substance misuse needs)?*

This response summarises the contributions made by attendees for the Ministry of Justice to consider in greater detail. The CJA members in attendance were: Anglia Care Trust, Census Life, Clean Sheet, Clinks Emmaus, Khulisa, Langley House Trust, Nacro, Pecan, Penrose Social Interest Group, St Giles Trust, St Mungo's and Women in Prison. New Leaf Initiative contributed via email.

There have been a range of reports published on this issue over the last few years, referenced at the end of the report, but disappointingly the situation is getting worse – a recent report by HMI Probation outlined that almost a third of prisoners on short sentences are being released with no fixed abode.<sup>1</sup> With a new Prisons and Probation Minister, a new Chief Executive of HMPPS and reforms to probation services, we hope this timely briefing will be a catalyst for action.

### **Key Findings and Recommendations**

#### **1. Cross-departmental strategy**

Despite some good initiatives with the rough sleeping pilots in three prisons, poor accommodation outcomes for people leaving prison continue to significantly undermine resettlement and rehabilitation and there is an urgent need for action. We repeat the recommendation made by the RR3 Special Interest Group on accommodation over a year ago in April 2018 that '*The Ministry of Justice should develop and lead a cross-departmental accommodation strategy.*'

#### **2. Reducing Reoffending Board**

Accommodation is a complex issue and its solutions require significant input from beyond the Ministry of Justice, most notably the Ministry of Housing, Communities and Local

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<sup>1</sup> <https://www.justiceinspectorates.gov.uk/hmiprobation/wp-content/uploads/sites/5/2019/05/Post-release-supervision-inspection-report.pdf>

Government and the Department for Work and Pensions. *The Reducing Reoffending Board – set up in 2018 to support cross-departmental work on the main causes of reoffending, including accommodation – should publish information on its work so far and its expected actions and outcomes for the next two years, particularly as probation services enter a new post-TR phase. This update should clarify whose responsibility is it to fund housing for people leaving prison and people with serious convictions in the community.*

### **3. Involving people with lived experience**

People with lived experience of prison and homelessness can provide invaluable insight into the needs of this cohort and the changes that could make a real difference. *An accommodation strategy must ensure it meaningfully involves people with lived experience of the system in the development of the strategy, delivery of support services and oversight of its implementation. Organisations with expertise in participation and the HMPPS Service User Advisory Group should help facilitate this.*

### **4. Homes, not just housing**

The term 'accommodation' does not fully capture the concept of a 'home'. As well as quantity of housing, quality of housing and support services is equally important. *Services should work towards securing homes for people leaving prison, which provide long-term stability, safety, comfort and community.*

### **5. Prioritising prevention and reducing remand, recall and short sentences**

Many people become homeless as a result of entering the criminal justice system, including people who are held in prison on remand, after being recalled or on short custodial sentences. *Taking positive steps to reduce the number of people in prison on short sentences, remand and recall are long term solutions. For those taken into custody opportunities should be identified early, such as during the court process, to maintain housing where possible or to terminate it in such a way as to minimise negative consequences on release.*

### **6. Family and friends**

If living with family or friends is an option, supporting these relationships while in prison can provide a route to finding a home on release from prison, but support may also be required to support the transition. There may be a need for culturally sensitive mediation services to help re-build relationships. *Pre-release planning, family involvement and Through the Gate support should be offered if someone leaving prison will be living with friends or family to ensure positive outcomes for both parties.*

### **7. Timely assessment and review**

Timely assessment of these needs is crucial for successful housing outcomes. *Accommodation screening tools must be consistently applied to every person in prison at the start of their sentence and then again well before being released, and resettlement plans promptly dealt with. HMPPS should investigate why prison and probation services are not making referrals at the expected rate and produce an action plan to address any identified problems.*

### **8. Advocacy and Friday Releases**

Through the Gate support and independent advocacy can be important factors in the likelihood of a person securing housing on release from prison. Friday releases make advocacy to secure accommodation even more difficult. *Timely needs assessments in prison must identify the level of support required for a person leaving prison and ensure*

any necessary independent advocacy is in place on release. Measures should be taken to end Friday releases.

### **9. De-risking private rented accommodation**

The private rented sector could play a bigger role in providing accommodation for people leaving prison, particularly if tenancies can be 'de-risked' by providing guarantees, deposits, and support and building trust with landlords. *HMPPS should explore how the private rented sector can be better utilised to provide homes for people leaving prison where suitable.*

### **10. Foster collaboration and support specialist services**

Commissioning structures can hamper local relationship-building, innovation and the inclusion of small, specialist organisations. *HMPPS should consult widely on the proposed Dynamic Framework for probation services to ensure that learning is carried forward from similar schemes in the Department for Work and Pensions and prison education.*

### **11. Engage with employers and remove barriers to employment**

There are promising initiatives that combine employment with accommodation, such as Recycling Lives, which provides both jobs and homes for people leaving prison. *HMPPS should work with employers to better understand how these initiatives could be more widely implemented. Support should be offered to those in supported accommodation who secure employment to ensure they are not financially penalised.*

### **12. Women and young adults**

Women may have particular housing and support needs that reflect additional vulnerabilities or caring responsibilities. Young adults are being housed in inappropriate Houses of Multiple Occupation due to benefit rules for that age group. *The Female Offender Strategy should ensure that women's centres are developed with a strong emphasis on housing advocacy support and building links with local housing providers. Benefit rules relating to the housing of young adults should be reviewed to ensure they are not housing in inappropriate HMOs.*

## **Roundtable Discussion**

### **• Why is getting post-release accommodation right so crucial?**

*'I would say accommodation is the biggest issue for us – one of the most important and the most challenging. And the numbers say the situation is getting worse in terms of the numbers coming out of prison with nowhere to go.'*

Many attendees described how accommodation is fundamental because without it, access to other services can become even more difficult and can lead to a detrimental impact on people's mental well-being.

*'The impact of not knowing where you're going is huge on somebody. It's quite anxiety increasing anyway, leaving prison, we shouldn't pretend that this is an easy or a good time for people all the time. It's very difficult. And not having somewhere to live, and not having that security can be really challenging.'*

One attendee specifically identified people assessed as medium risk as being particularly affected by lack of appropriate accommodation on release.

*'But there is that big massive gap. And I think for medium risk offenders in particular they can end up being released into unsuitable accommodation or floating support or not being in a place where they have enough support around them to stop them being a risk to themselves or to others.'*

- **There is no 'one size fits all' approach**

Many attendees highlighted the importance of recognising that different people will have different housing situations and different needs. Some people may leave prison and require only a minimal amount of short-term support to help them get back on their feet and re-establish independent living. But many other people leaving prison will need much more intensive support and for a greater length of time.

*'We should realise that not everyone comes out of prison with the same housing situation. There will be people who were homeless before prison, people with family – it's important we recognise there are a different set of needs across the board.'*

*'There's as many variations across the country as there are possibly offenders as it were... So there's a lot of variability so I don't think we can say once size fits all.'*

*'People have different needs don't they, aside from the cohorts that you mentioned, people have different desires and needs. So I think a range of provision is actually quite important. Some people will need and want support, some won't, they'd prefer to be more on their own and be more independent. I just think it's important to recognise that needs vary.'*

*'Some of the people we work with who are leaving prison would benefit from just short term support with tenancy training, all of those things. Almost a kind of 'move on' support, which isn't necessarily as much as the two-year offender accommodation pilots, just a shorter term support plan to be able to give them the skills and get them to be able to move on.'*

- **Need for cross-departmental working and 'ownership' of the issue**

Many attendees stressed the importance of cross-departmental working in achieving positive accommodation outcomes for people leaving prison. While this point is clearly recognised at senior levels, with the creation of the Reducing Reoffending Board, this recognition needs to result in clear action, as well as filtering down to local levels so different agencies are encouraged to link up their work more effectively. There needs to be a significant shift in thinking across different agencies as to who has 'ownership' of issues that directly affect the criminal justice system – like accommodation – but cannot be resolved by the criminal justice system alone.

*'We would love for central government to talk to other departments within central government and recognise that housing is a massive issue.'*

*'MoJ can't solve this by themselves and this is where I have sympathy with MoJ and HMPPS on this because they really can't. They've got the money from MHCLG for rough sleeping pilots but I just think until there's complete cross-government focus on this then you can't move forward either.'*

*'The fact that accommodation for people leaving prison often gets lost in the policy and in the conversations but actually it affects so many other areas that the government are focussing on with mothers and their children and with people facing mental health difficulties, for people facing addiction.'*

*'One of the issues that disconnects is the lack of ownership because it does require joined up cross sector thinking. And we're seeing basically that the reducing reoffending agenda*

*is just lost in a bigger local political mess in some respects as it were. And certainly with the integration of health and care and the significance and power of clinical commissioning groups, probation and offending – it's lost.'*

*'There's something about clarity of ownership. I think that's quite important with accommodation because I do think since TR that there has been an assumption in some areas that CRCs are responsible for providing a house. They're not responsible for that, it's about helping to secure accommodation. They don't have any houses to give them. And I think that in some areas local authorities have misunderstood that, whether wilfully or not, but that has been used as an excuse. And actually there's a bit of a question about who's responsibility is that then. So I think there's an opportunity with new probation reforms to be very clear on who's responsibility this is.'*

*'I think certainly locally I think services are disconnected in many respects. And I think certainly if there is strong leadership and, as I say, that ebbs and flows in some respects. But where there is strong leadership then people can try and make things happen.'*

*'Existing structures that look at housing and homelessness often don't have criminal justice at the table, neither police, prisons and probation. And so I think it's being in those rooms when those conversations are being had and making sure that any sort of new structures that are being created with a housing or homelessness frame have those other parts of the system round the table because otherwise, like you say, that's how you build the deep and meaningful relationships locally that aren't just sort of duty free, box-tick, next, that embed that much deeper relationship locally.'*

One attendee also highlighted the need for better engagement between central government and communities on this issue and better systems to support local innovation.

*'I think the reality is that over the years HMPPS have been very inward looking as it were and focussed on their own issues as opposed to looking out into the community. And I think there is innovation in the local community, but systems perhaps don't necessarily allow it to develop and emerge.'*

- **Providing homes not just housing**

Many attendees were keen to highlight the importance of recognising that accommodation, as a term, does not best capture the concept of a 'home' that agencies should be striving towards securing for people coming out of prison. A shift in terminology may help to encourage more long-term thinking about the necessary steps towards supporting someone to secure and maintain a home, rather than a dehumanised, box-ticking exercise.

*'I know some of our staff who work in this area are saying they're seeing it as a box-ticking exercise for some local authorities.'*

*'Although we talk about it, and I talk about it all the time, in terms of the word accommodation, we're really talking about somebody's home aren't we. And I think we should just try and remember that and think about this is somebody's home in the future so what pathway are we putting them on as well. So we've got to sort out the immediate but it's about giving them a long term home at some point. So how do we get them to that point, rather than slightly dehumanising it all the time with accommodation.'*

*'I like that word home as well because it says something about dignity and I think there's such a lack of dignity, even in the conversations we have to have because there's so much urgency to sort things out right now, we forget that actually they are a human being.'*

- **Lived experience**

Several attendees highlighted the importance of meaningfully including people with lived experience in conversations about potential solutions.

*'We need to engage more with the people that this affects, people in the prisons, people that are coming out, people that in supporting accommodation or in the APs and actually ask them what they need, rather than us sitting here saying this is what everybody needs.'*

- **Good practice is patchy and depends heavily on the local authority**

Many attendees commented on the important role of local authorities in delivering good housing outcomes for people leaving prison. However, good practice was described as something of a 'postcode lottery' and in areas where local authorities do not co-operate effectively with the criminal justice system it can seriously hamper the positive expectations for the Homelessness Reduction Act.

*'In some particular cases, and particularly in the open estate, we've seen some really good practice where working with a local authority we've been able to support ROTL applications.'*

*'On the flipside for a lot of authorities, nothing has changed. We make the referral and we get nothing back. We either are met with a wall of silence or the local authority simply says 'you need to come and present on the day you're released' which entirely defeats the whole purpose of what this was put in place for.'*

*'Because more and more referral routes are now just funnelled through local authorities. So there's very few providers that we can refer directly to, which obviously has some benefits but it does mean that if you're dealing with a local authority which is, let's say, less than proactive then those referrals just sort of disappear into nowhere and don't even get onto a housing provider.'*

While local authorities came under some criticism for not effectively engaging with the issue of post-release accommodation, some attendees recognised that cuts to funding and the removal of ringfences from particular funding pots have exacerbated the problems for 'specialist' criminal justice services.

*'And I think just to reinforce what's already been said about the cuts to support services. We did a bit of work looking at the impact of the removal of the supporting people ringfence on these particular services. I think we saw floating support, criminal justice specialist support services being cut by about 88 per cent. So of all the specialist support groups funded by Supporting People those for ex-offenders were far and away the greatest cuts.'*

*'We'd love for central government to be able to provide some funding to local authorities so they can ringfence housing for people in their areas.'*

While attendees appreciated that a universal housing supply issue is beyond the scope of the criminal justice system, many still highlighted the relevance of this issue to the challenges facing people coming out of prison.

*'Timely access also relies on supply.'*

*'But actually, when it comes down to it, we have a huge supply issue. So actually, how are we going to make sure there's enough housing for people coming out of prison.'*

*'It's hard to resolve the issue of access without having a conversation about supply and those much wider drivers.'*

One attendee highlighted that a potential solution to address supply by providing temporary modular housing units for young people coming out of prison was stymied.

*'It was interesting some conversations we've had, we were approached by an engineering firm who were - who could create modular housing. What they wanted was an organisation who had some experience with accommodation but support as well. So they can put these up anywhere, he said, look we're on the same sheet, the issue then comes to the local authority. When we approached the local authority, because these modular houses would not meet the minimum space requirements that local authorities sign up to, local authorities are saying it's not a good fit. So you've got conflicting ideas. Does a young person for example need 40 plus square metres of space - they may well do. But if there is some scope to increase the housing stock on a temporary basis, could smaller units which don't meet the minimum housing square footage work? And you can just see some competing and conflicting agendas in some respects. You could just create some basic stuff, which may help on a temporary basis, but local authorities are saying our minimum standards which we signed up to centrally won't allow us to.'*

[Following the roundtable, an individual contacted the CJA via twitter to inform us she was being evicted from her supported housing due to a decision by Kent Council Council to withdraw funding from all supported housing for ex-prisoners. This decision is extremely concerning and there should be a response from the RRB to clarify what action is being taken to address this issue in the short and longer-term.]

Accommodation for people leaving prison is also vulnerable to public opinion. As one attendee highlighted, when accommodation for this cohort is removed, community resistance can prevent it being reinstated.

*'And the downside of losing any kind of offender accommodation is once you've lost it, you've lost it. It's lost to the sector, because the opposition from communities to open up anything new is huge.'*

- **Maintaining pre-existing accommodation**

Several attendees highlighted how the criminal justice system currently makes it very difficult for people who do have accommodation prior to entering prison to maintain that accommodation or, at the very least, to bring that accommodation to an end with minimal knock-on effects for future housing options. One attendee highlighted the importance of working with people while they go through the courts in order to provide this kind of timely support.

*'There's very little scope to work with those people in courts, pre-sentence. The systems are predicated on processing people through systems. If you could get people caught in a timely way and have access to those being sentenced there is scope to actually close their tenancy with the local authority, build trust with landlords, hand across the key, deal with the pets, deal with the belongings. And when they come out there's some potential there to actually maintain the relationships.'*

One attendee highlighted that maintaining accommodation may be particularly problematic and overlooked as an issue, in particular those on remand.

*'I actually think in terms of the role of the MoJ a lot of it is about maintenance and maintaining accommodation once someone comes into prison. And I think many people will lose it and therefore be deemed intentionally homeless. And there's a particular, I think we have from reports from services, issue to do with remand. So prisoners on remand are actually being at a heightened risk of those same problems.'*

- **Living with friends and family**

Some attendees referenced the importance of supporting family relationships as a route towards positive housing outcomes on release from prison.

*'So, there needs to be maybe a third funding portal that addresses issues like families, which perhaps aren't seen as quite as important as accommodation or employment but in reality, are just as important.'*

But attendees were also keen to highlight that while staying with family or friends upon leaving prison can be beneficial if it stops someone from rough sleeping, it can also create new problems or exacerbate pre-existing issues if relationships break down or the environment is unsupportive.

*'And for some, going back to live with family or friends is the only option, particularly for young people. But in some cases that can be detrimental, and can lead to past associations. We see quite a lot of people going back to family or friends but then quite quickly becoming homeless anyway because those relationships have broken down.'*

*'Just to add something on the conversation about family and friends as a potential accommodation option. It's one of the explanations for why the likelihood of rough sleeping relative to overall homelessness is so much higher within this particular group. There's a reason why a third of people sleeping rough in London have served time in prison and I think that there's that increased vulnerability, not only leading to housing problems and homelessness.'*

Some attendees noted the specific requirements of young adults coming out prison, many of whom return to family homes. This cohort may need particular support to ensure family relationships are healthy. Several attendees commented about the unsuitability of many Houses of Multiple Occupation (HMOs).

*'We did a report last year with CentrePoint on young adults coming out of prison and housing options for them. Because the benefits systems and the single room rate allowance and those things, it's even more challenging for that group to get any kind of housing that's suitable at all. So the vast majority go back to family. But part of what we were looking at was exactly that. It's the kind of support both when you first go into prison – how do we ensure there's support with the person and their family if their relationships has broken down. We've got to try and see if we can fix it actually. Cause that's really the only outcome for them is to be able to go back to family or friends that's realistic. So actually there should be a focus on that.'*

*'I'm not sure if it's an entirely helpful comment but I think for young adults particularly, and again it's not an MoJ issue, but I think we have to look at the welfare support. Because if they can't get equivalent welfare support then they're going into HMOs and it's entirely inappropriate. I feel like we're just setting that group up to fail in those circumstances when they can't draw proper accommodation.'*

Culturally specific support should be available to support BAME prisoners and their families. A report by Muslim Hands and Huddersfield Pakistani Community Alliance (2014) recommends *'Arrangements, where possible for mediation intervention for women and their families to reconnect. Strengthening of three-way information and communication between the prisoner, the prison and the family. Considering that in many instances the family or the prisoner may not understand the existing arrangements and protocol on or post release, acknowledging that language barriers could be a significant issue in this.'*

- **Private rented sector – building trust and connections**

Many attendees commented on the importance of considering the private rented sector's role in providing accommodation for people leaving prison. Some attendees highlighted how improving trust and building relationships with landlords is crucial.

*'Another thing with regard to timely access is about building relationships with landlords and getting that timing right. People spoke about accessing housing options teams – we really need to try and create some space where potential providers can come into the prison and see people in the prisons as it were. And once again, I appreciate the pressure on the prison estate, but we need to build those links so they don't have to pitch up at housing options on day one and establish those relationships.'*

*'If we want to get into private sector landlords arrangements it is 90 per cent trust.'*

*'I think if we kind of accept the premise that there's not going to be a huge public house building programme that's going to provide the stock that we need for this client group, and if you accept that we're not going to come back to the days of offender accommodation being ringfenced, then just as with employment, private landlords are absolutely pivotal to this situation, the same way that employers are going to be pivotal as well.'*

Some attendees highlighted initiatives to 'de-risk' the private rented sector by acting as guarantors, paying deposits and grants to ease transition or providing general support.

*'It's kind of what you were talking about, isn't it, in terms of delivering support through the private rented sector, through landlords, but with some additional support. And we do a similar programme with Nacro homes agency. And it basically is intervening into the private rented sector and de-risking it for landlords because we take on the risk. It's a risky thing to do, but that's what we do. But it also gives people - people move on with a reference, we've been able to give them their deposit and pay all of those things. And then they're into the private rented sector so they're able to move on with references etc and they've had some support.'*

*'By leasing through third parties we would guarantee their rent, we guarantee the protection of their property and support for the offender.'*

However the issue of differing needs was also raised, as for some people leaving prison the private rented sector may be particularly unsuitable because they require specialist support for mental health or substance misuse problems.

*'It's an obvious point but accommodation for each of these groups sometimes looks quite similar in terms of tenure type because we know that the outcomes from social housing is significantly better than for the private rented sector for many of these groups. And then it's probably a case of, well once we move beyond that, which groups is the private rented sector less suitable for. And I think that certainly without the level of support required to sustain it, particularly people with mental health problems, substance misuse problems and other kinds of comorbidities, I think it's probably a question about what's good quality support and accommodation taken together.'*

- **Timely pre-release assessments and reviews**

Attendees raised the issue of pre-release assessment as a crucial factor in producing positive accommodation outcomes for people leaving prison. Too often assessments are being made very close to the day of release, which does not give enough time for Through the Gate services to assess the available options and secure housing.

*'I think that, in terms of timely access, we were getting homeless decisions before people were released so at least we got other things to throw into the mix and other options to look at.'*

*'Women aren't being seen to do an assessment of what's going to happen upon release until really, really late on in the day so that often the window where you're supposed to*

*do it three months before isn't really happening. So if that's not happening then everything is delayed and then of course the referral comes in much too late.'*

*'We have this issue that we get referrals from Through the Gate two days before they're through the gate and then you can't do it and you don't have any time to meet the person. So in an ideal world it would be set up so you could have an advocate from the very beginning of your sentence who could go in, establish the rapport and do all that work and then have TTG and have those things already connected up. And that would be so logical and we're so ready to do that but there's always this glitch that you don't hear about the referral until it's tomorrow.'*

Other attendees highlighted instances where assessments are actually made much too early in a person's custodial sentence so that their circumstances have actually changed by the time of release, but no up-to-date assessment has been made.

*'And this person, they've had their assessment about accommodation and when they went in, 12 months two years prior, they had accommodation. They had everything. But they only ever had the assessment 12 months ago and nobody's seen them since. So it's only apparent three weeks before they're being released the relationship's broken down, they've nowhere to go or they can't go back to that area and it's only just been flagged and everyone is running about like a headless chicken because they can't get them anywhere.'*

- **Through the Gate support and independent advocacy**

Some attendees also highlighted the importance of Through the Gate support to provide continuity and better accommodation outcomes for people leaving prison.

*'One of them is about Through the Gate support because, a couple of a months ago I did a small exercise looking at the number of referrals to housing providers, whether they were to local authorities through the duty to refer or just directly to housing providers – those without Through the Gate support, over two thirds, weren't turning up to appointments or interviews. But those with Through the Gate support, it was about an 80 per cent success rate. So there's a huge issue.'*

*'But from some of the CRCs I've spoken to, in the prisons, they just say 'look, we just do the signposting.' And that's it. We signpost them to wherever, off they go, we don't follow it up, we don't do any Through the Gate, there's nothing. So I think that's where the system is falling down. There isn't anything that kind of follows someone on the journey from prison into the community, except for organisations that are in the prisons like St Giles that are doing that kind of intensive work. And I think that's where, unless organisations like the CRCs with the new contracts are actually mandated to do this properly then somebody else needs to be doing it.'*

Connected to the issue of Through the Gate support is the need for effective independent advocacy. Some attendees highlighted how important this advocacy is for accommodation issues because of the resistance from some local authorities to carry out their duties. It can be very difficult (and potentially detrimental to their case) for people coming out of prison without independent support to persuade local authorities to progress their case.

*'But the reason why we have really good outcomes is because we have a person who literally sticks with them – it's much more than your normal Through the Gate stuff. So they're much more intense whilst they're in prison, they pick them up at the gate, they give them a mobile phone, they do everything, they go to housing with them and you know, they argue with the housing authority. Every single time. One of our staff was accused of doing a sit-in in the local authority because he refused to leave because he was*

*like, he's priority need, you cannot not house him. And they were saying, no he's not, you need to do all these things. But it works because there's someone fighting their corner.'*

- **Low referral rates**

Some attendees expressed surprise that some local authorities have claimed that they receive lower than expected referral rates for accommodation from prisons and probation. This issue may require further analysis to better understand the degree of the problem and its drivers.

*'We do referrals on behalf of the CRCs quite often. We refer everyone we come across. So I'm quite surprised that it's low.'*

*'So those that are doing the Through the Gate, we will do those referrals on behalf of the CRC. But I agree, we would refer them all the time. So I think it's quite surprising actually.'*

- **Commissioning structures**

Many attendees commented on difficulties with complex commissioning structures that prevent organisations from being able to identify where the 'gaps' are in service provision. For charities in particular, many are left to identify areas of work themselves and secure the funding to deliver services. However, one attendee noted how some trusts and foundations have become less willing to fund charities because they believe these services are being delivered by CRCs, even if that is not reflected in reality.

*'It's difficult in a charitable organisation to understand where the gaps are. Because charities are established to fill gaps in public sector, going way back. The commissioning landscape from a public sector perspective is so complicated, with European monies, local government. Wherever it comes from, it's difficult to know where to fill gaps. And so, just speaking from Eastern area, hence I couldn't answer your question because is there any mediation work going with families, that type of thing – yes, perhaps there is but that may be commissioned through a CRC that links in with family support at the gate. But you wouldn't know what that landscape looks like.'*

*'But again, it's where does that money come from, where's the commissioning, where's the direction from HMPPS so say this is where the gaps are. It's left to the charities to go off and find the funding for themselves to just deliver that, exactly what we have done.'*

*'I suppose then it's a question for when regional commissioning comes in in 2021 I think when probation services are renationalised. I think it's thinking through some of the implications as well and what does that look like. Because you could end up having a similar situation to what we have now just being replicated depending on how those regional commissioning structures are set.'*

*'One of the many, many problems of TR was around expectations, and particularly around family relationships. Because I think CRCs were seen as these sort of bodies that were going to deliver all things to all people across all pathways and actually one of the unforeseen consequences of that is that trusts and foundations have stopped funding a lot of criminal justice work. Because they say, well CRCs should be delivering that.'*

*'Just clarity of purpose as much as anything. Who does what in the commissioning landscape? And that will help organisations like ours understand if there are any gaps we can try and fill as it were. That, in itself, would be helpful.'*

Some attendees also highlighted how commissioning frameworks are being further complicated, and collaboration prevented, by Dynamic Purchasing Systems, which have

now been introduced into prison education and were already in operation for the Department for Work and Pensions.

*'We've tried from a housing link, certainly in the east region, working closely with DWP where offenders have had a job offer in prison and try to link it. Part of the issue there is trying to bring something that would work, is accessing the dynamic purchasing system of DWP. Colleagues mentioned the MoJ one. The DWP purchasing system is the biggest crime to ever land in this country. Market innovation happens where people do business together. We actually try to collaborate with colleagues locally to say DWP, JobCentre want some people to mentoring in the prisons and come out as well. We said, yes we can do that. It will link in with housing, it'll be a fantastic match. We have to then register into DWP, onto dynamic purchasing, it's then a bloody algorithm somewhere that determines a match. We don't know if the bids were submitted. They were good, they were high price, high quality. There is no scope to negotiate, discuss, readjust, quantify. It must have been designed for purchasing paper clips. But when it comes to social business it's one of the biggest barriers to bringing people together.'*

*'We all know there are massive challenges within the education DPS as well. It doesn't work and governors are basically saying, no we're not, it's too complicated, we're not going to purchase through it. It doesn't bode well for probation going through DPS.'*

- **Employment and housing**

Some attendees referenced the importance of linking employment and accommodation to create a bedrock of stability for a person leaving prison. Many attendees praised the work of Recycling Lives, an organisation that both employs people leaving prison and provides them with homes. Many attendees felt this was an initiative that merits further inquiry. Some attendees highlighted the particular frustration of having secured employment for someone leaving prison but then having to turn it down because accommodation has not been secured.

*'We're training and employing people, guaranteeing people jobs when they get out, which very few people do. Again, Recycling Lives do that wonderfully well, which is probably the reason they've gone one step further and looked at the accommodation, which is something we're looking at now. Because, in all intents and purposes, if nobody else going to do it, we're going to have to do it. Because we're setting people up to fail. We've got a job they're guaranteed but someone can't accept it. It's ridiculous. If we're going to be able to put people in the position where they're having to turn work down because they don't have anywhere to live, it's a national scandal, it really is.'*

Some attendees also highlighted how systems can disincentivise employment for people who are in supported accommodation because they stop receiving housing benefits for the rent but must continue to pay for the support when they enter work, so helping people at that time is particularly crucial.

*'Again, what you were saying about desistance, it's a huge thing for your identity to suddenly get out of prison where you're told what to do, and I know I'm preaching to the choir here, but when you suddenly have all that independence to take back on yourself again, actually going to an interview, speaking to our team, putting yourself out there and getting a job, it's such a huge thing. And if you've then got that knockback of having all of your benefits stopped, all of your wages having to go onto accommodation again, actually you have no incentive to want to work. Because at the moment you've got free accommodation. And it's a huge struggle that we keep facing.'*

*'With regards to the employment/housing issue the contradiction at the moment is the shoe-horning of people into work from, regardless of whether they are in supported accommodation, which then penalises them by upping what they pay. If they don't look*

*for work, they are sanctioned so the system contradicts itself and people are damned if they do and damned if they don't work.'*

One attendee highlighted positive work being done to address this:

*'The issue is the landlord can adjust the rates because someone is going into work. What we do is we provide a grant which gets round the issue. If someone gets into work there's a grant to ease the transition.'*

People leaving prison wanting to set up their own businesses or social enterprises might be a group who could benefit from a specific housing project and support:

*'We are considering a joint project [with a housing association] around self-employment funding and building a supportive community to house people coming out of prison.'*

- **Women**

Several attendees highlighted the importance of providing appropriate accommodation for women, too many of whom are kept in temporary accommodation that is unsuitable.

*'We have a big issue with women being held in temporary accommodation for such a long time. So because there's massive backlogs in terms of having a decision made about need within 58 days. That's really not happening. So there's lots of cases that come to mind of women who are in really inadequate temporary accommodation, which on a really temporary basis, you might be like ok, but when it's a really long time, it's really detrimental.'*

*'The urgent need continues to exist for temporary, supported and permanent housing for women. We know that specialist advocacy support on leaving prison makes a real difference. Sadly, Holloway's closure meant that we lost funding for our London Housing project for women leaving prison so since then our support on this is part of general advocacy rather than a specialist project.'*

*'We are concerned that a focus on residential women's centres has meant that women's broad housing needs have not been given the focus they should in the first year of the MoJ's Female Offender Strategy. We are of the view that the housing focus of the Strategy should be on building on existing good practice - Trevi House; Reunite, Housing for Women etc, rather than creating new institutions. A more strategic approach would be to ensure that women's centres services are developed with strong housing advocacy support and close working with housing departments and housing providers. Another good practice model is that of 'Prison Link Workers' in Styal who, as well as providing support 'to and through the gate', help women build relationships with women's services in the community so these can provide more medium/long term engagement and support in accessing and retaining housing.'*

*'The Housing First model needs to be promoted much more strongly across the CJS for both women and men. A couple of weeks ago at one of our hubs a woman on a community sentence disclosed she was sleeping in her car and using local leisure centres for showers etc. This kind of disclosure only comes with trust built up with advocates and services, so shows how vital it is that services like ours remain independent of the punitive system.'*

- **Recall**

One attendee also raised the issue of recall and the extremely disruptive effect it can have on accommodation. *'The impact of recall on housing is an absolute disaster. So that's the most important thing on my agenda because that can be addressed, there's no reason for it. We're recalling many people just cause they haven't had contact, not because they've*

*committed anything, are causing any more risk. Just they haven't been in touch. And when it comes to housing, you start living somewhere and then suddenly, you know, so if that could be taken into account that would be really helpful.'*

## **Useful Reading**

Clinks (2018) - RR3 Special Interest Group on accommodation: ensuring the accommodation needs of people in contact with the criminal justice system are met ([https://www.clinks.org/sites/default/files/2018-09/clinks\\_rr3\\_sig-accommodation\\_v10-ic\\_0.pdf](https://www.clinks.org/sites/default/files/2018-09/clinks_rr3_sig-accommodation_v10-ic_0.pdf))

Homeless Link (2018) - Working with prison leavers: Resource for homelessness services (<https://www.homeless.org.uk/sites/default/files/site-attachments/Working%20with%20prison%20leavers%20March%202018.pdf>)

Nacro / Centrepont (2018) - 'Have you got anybody you can stay with?' Housing options for young adults leaving custody (<https://3bx16p38bchl32s0e12di03h-wpengine.netdna-ssl.com/wp-content/uploads/2018/06/Nacro-Centrepoint-Report-Have-you-got-anybody-you-can-stay-with-June-2018.pdf>)

Nacro (2018) – Barriers to Effective Resettlement: Friday Prison Releases (<https://3bx16p38bchl32s0e12di03h-wpengine.netdna-ssl.com/wp-content/uploads/2018/08/Nacro-Policy-Briefing-Friday-Releases.pdf>)

Prison Reform Trust (Revised 2018) – Home truths: housing for women in the criminal justice system (<http://www.prisonreformtrust.org.uk/portals/0/documents/home%20truths%20june%202018.pdf>)

All-Party Parliamentary Group for Ending Homelessness (2017) – Homelessness prevention for care leavers, prison leavers and survivors of domestic violence ([https://www.crisis.org.uk/media/237534/appg\\_for\\_ending\\_homelessness\\_report\\_2017\\_pdf.pdf](https://www.crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf))

Muslim Hands and Huddersfield Pakistani Community Alliance (2014) – Muslim Women in Prison: Second Chance, Fresh Horizons ([https://muslimhands.org.uk/ui/uploads/kqe5a9/MWIP\\_Report.pdf](https://muslimhands.org.uk/ui/uploads/kqe5a9/MWIP_Report.pdf))

The Howard League (2013) – No Fixed Abode, The implications for homeless people in the criminal justice system (<https://howardleague.org/wp-content/uploads/2016/04/No-fixed-abode-report.pdf>)