



The Royal College of Midwives
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HRAreview@communities.gov.uk

**The Royal College of Midwives' response to the *Homelessness Reduction Act 2017*
Call for Evidence.**

The Royal College of Midwives (RCM) is the trade union and professional organisation that represents the vast majority of practising midwives in the UK. It is the only such organisation run by midwives for midwives. The RCM is the voice of midwifery, providing excellence in representation, professional leadership, education and influence for and on behalf of midwives. We actively support and campaign for improvements to maternity services and provide professional leadership for one of the most established clinical disciplines.

The RCM welcomes the opportunity to respond to this consultation and our views are set out below.

The housing situation across the United Kingdom is an issue of great concern to the RCM. Living circumstances are crucial to a healthy pregnancy and birth outcomes; and women experiencing difficulties in securing suitable accommodation in good time for their baby's arrival will have particular need for advice and support. Midwives provide holistic care and therefore have particular insight on the rising incidence of homelessness or risk of homelessness amongst women accessing maternity services.

Homelessness can come to light for the first time in pregnancy where previously it may have been hidden from view. Midwives invite women to disclose information about their living situation as part of their assessment of social and clinical needs. At their booking appointment, or indeed at any stage during the maternity care pathway, a woman's housing and relationship circumstances may become apparent and a cause for concern.

The RCM was optimistic that the new legislation, the *Homelessness Reduction Act (2017)* (HRA) would assist in tackling homelessness by encouraging closer collaboration between health and social care agencies. Midwives have traditionally supported women and families experiencing housing issues by writing letters of support outlining clinical and social needs, sometimes contacting housing departments or signposting to local authorities. However, the expectations of health professionals were not clearly set out and the work involved could be time-consuming.

Conversely, the HRA outlined a pathway and protocol, together with a new duty to refer into the appropriate department for homelessness prevention and assistance. To promote and inform midwives and maternity support workers of these new responsibilities, the RCM worked with specialist midwives, the Local Government Association, the Department of

Health and Social Care and the London Network for Nurses and Midwives working with homelessness to develop practical guidance and a toolkit for supporting women in their care¹.

The online and hard copy publication produced in March 2019 contains information, advice and resources to support staff and ultimately improve the care they are able to provide for vulnerable women.

A high profile event took place at the Ingleside Birth Centre where Greater Manchester Mayor, Andy Burnham, launched the RCM's guidance, ensuring the issue was given as much publicity as possible and linking in with existing initiatives working with homelessness – including the Mayor's own [A Bed Every Night](#) programme, and midwives and charities that work with women at risk of homelessness, including the Salford Survivor Project [Salford Survivor Project](#).

The booklet has proved to be a popular resource with RCM members and focus group sessions have taken place with workplace representatives from around the UK to assist with dissemination and understanding of the new duty to refer.

Despite the considerable efforts by our organisation and others, the RCM is concerned that the purpose of the Act has not been fulfilled.

A number of RCM members have recently told us that while they are aware of the HRA, referrals they have made for assistance and intervention were no less onerous than before, and that new systems and pathways have not been communicated effectively with appropriate members of staff.

Midwives with specialist roles, who care for women already presenting with complex social factors, appear to have a better understanding of the new responsibilities and how to utilise the referral process. However, particularly given the emphasis the HRA places on prevention, the RCM is mindful that early opportunities to intervene may be being missed by the wider workforce.

It is clear that training is not adequate and there needs to be a concerted effort to incorporate relevant modules into mandatory updates. It must be remembered that workforce pressures have an impact on the availability of training for midwives and MSWs and the RCM continues to campaign for staff shortages to be addressed and for sustained investment in maternity services.

The RCM believes that the limited success of the HRA to date is due to a lack of integration and partnership working between maternity services, the NHS and local councils and unfortunately the good intentions of this important legislation are being frustrated by systemic issues and under-investment. I

¹ Duty to Refer: Guidance for Midwives on the Homelessness Reduction Act (2017). 2018. Royal College of Midwives
<https://www.rcm.org.uk/publications/?query=duty+to+refer+guidance+for+midwives+on+the+homelessness+reduction+act>

The new regulations on duty to refer must be underpinned with a Government commitment to staff training, interagency working and implementation evaluation, in order that those who are homeless, or at risk of homelessness, to be counted and appropriately supported.

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