

Homeless and Inclusion Health standards for commissioners and service providers

These standards are endorsed by the following organisations:



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This is the third edition of the Faculty Standards. The first edition, published in May 2011, considered healthcare for homeless people. The second edition, published in September 2013 with the support of the National Inclusion Health Board, included vulnerable migrants, Gypsies and Travellers, and sex workers as well as homeless people. This third edition incorporates the latest evidence, and a full revision of the Standards.

With warm thanks to all those members of this Faculty, service users and professionals, who contributed so generously of their time and expertise to develop earlier versions and this revised edition. We would particularly like to acknowledge the following contributors to this edition:

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The Faculty for Homeless and Inclusion Health

The Faculty is an inclusive membership organisation for people involved in healthcare for excluded groups. Membership is open to nurses, doctors, allied medical professionals, social workers, public health experts, health advocates and support workers, commissioners, researchers and people with a lived experience of exclusion.

Our aim is to improve the quality of healthcare for homeless people and other excluded groups. We do this by setting standards and supporting services in which generosity, kindness and compassion combine with a passionate commitment to professional quality to become the defining characteristics of health services for homeless and multiply disadvantaged people. The Faculty is hosted by Pathway.

Pathway

Pathway is a registered charity, working to transform the quality of healthcare for homeless people and other socially excluded groups. Pathway is delighted to publish this revised set of Standards for Homeless and Inclusion Health on behalf of the Faculty for Homeless and Inclusion Health.

For more information about Pathway visit www.pathway.org.uk

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Standards for commissioners and service providers

Version 3.1

Revised October 2018

Editor: Dr Nigel Hewett OBE FRCGP

Secretary to the Faculty for Homeless and Inclusion Health



**Royal College
of Physicians**

“I am pleased to endorse these standards on behalf of the Royal College of Physicians. Addressing the social determinants of health is an essential component of effective health care. New ‘duties to refer’ imposed by the Homelessness Reduction Act 2017 present a real opportunity for secondary care to contribute to integrated care, these standards explain clearly how to do this well.”

– Professor Jane Dacre MD PRCP, President, Royal College of Physicians



“Meeting the needs of socially excluded and marginalised groups is a key test of a healthcare system’s effectiveness and compassion. The College strongly supports these standards as they shine a light on this issue and offer practical advice to commissioners and service providers to ensure they provide care that reflects the specific needs of homeless people and other related marginalised groups.”

– Adrian James, Registrar, The Royal College of Psychiatrists

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A call to action

Clinicians have come together to make a landmark statement about how we should respond to the Social Determinants of Health. In May 2017, the Academy of Medical Royal Colleges and the Faculty for Homeless and Inclusion Health published this Joint Position Statement:

Academy of Medical Royal Colleges



“Inclusion health is a research, service, and policy agenda that aims to redress extreme health and social inequities among the most vulnerable and marginalised in a community.”

“To reduce the steepness of the social gradient in health, actions must be universal, but with a scale and intensity that is proportionate to the level of disadvantage. We call this proportionate universalism.”

Inclusion Health is a universal concept but responds to local needs. The Academy of Medical Royal Colleges (the Academy) and the Faculty for Homeless and Inclusion Health are committed to high-quality care for all who use the NHS. Those who are living on the margins of society are too often poorly served. We believe that care must be tailored to reflect the particular needs of each patient, with clinicians addressing the patients’ total health, care and social needs.

There is a growing understanding of the impact of health inequalities on patients and healthcare providers. Whilst many people experiencing deprivation will face the health impact of inequality, this impact is particularly acute for the most marginalised. People in this situation may include homeless people, vulnerable migrants, sex workers, Gypsies and Travellers and those in contact with the criminal justice system.

The Academy and the Faculty of Homeless and Inclusion Health are committed to:

- Promoting “Proportionate Universalism” – health resource distribution that favours the disadvantaged and actively reverses the “inverse care law”.
- Meeting the health needs of excluded groups with respect, dignity and compassion.
- Ensuring prompt access to emergency care for all.
- Offering GP registration to all who need healthcare.
- Addressing cost recovery only after the patient receives urgent treatment.
- Integrated care that considers patients’ physical, psychological and social care needs, with complexity managed by individual care coordination supported by a multi-disciplinary team.
- Empowering patients to make decisions about their health, and involving patients in the design and delivery of care.
- Improving awareness that healthcare alone cannot transform health inequalities. It requires societal change, reducing poverty and inequality to tackle the root causes of homelessness and multiple disadvantage.
- A recognition that all clinicians must be involved in helping patients to improve their health, not just by medical treatment but through advocacy, interprofessional working and engagement with public health.
- National standards for NHS recording of key data to improve future planning of care, for example housing status and Gypsy and Traveller ethnicity.
- Informing equality and equity in commissioning through ensuring data about the health of excluded people are gathered and included in Joint Strategic Needs Assessments.
- Improving medical and nursing education so that healthcare professionals are equipped with the skills and confidence to address health inequalities and care for vulnerable patients with complex health and social needs.

Summary

The first set of Standards was published in 2011 and focused on healthcare for homeless people. In 2013 the Faculty for Homeless and Inclusion Health was established, and revised Standards were published, with an extended remit to include Gypsies and Travellers, vulnerable migrants and sex workers, as well as homeless people.

This is the third edition of the Standards for Commissioners and Service Providers. It has been written by a collaboration of professionals from a variety of disciplines in consultation with people with a personal experience of health inequalities. We do not consider the standards presented here to be either completely definitive or comprehensive, but they are a start. Future versions of this document will enhance, improve and extend them. We therefore welcome comments, criticisms and suggestions for additions or amendments.

The purpose of this document is to set clear minimum standards for planning, commissioning and providing healthcare for homeless people and other multiply excluded groups. The Faculty challenges all parties to work to these standards and to work with us to revise and improve them.

Our primary purpose is to reaffirm the fundamental rights of all people to be treated with dignity, compassion and respect. But an increasing body of evidence provides an additional driver for change. At the sharp end of health inequalities, homelessness and other expressions of social exclusion are associated with extremely high healthcare costs coupled with appalling outcomes – we must be able to do better than this.

The introduction provides a background understanding of the social determinants of health, the changing NHS context and the values base for responding to the needs of particular excluded groups.

We then present generic standards for all services, followed by specific standard sets addressing a wide range of clinical settings and considering specific excluded groups.

Demonstrating that a service meets these standards

The Faculty has developed a peer appraisal methodology that will help primary care services demonstrate that they meet these Standards,¹ and an audit process for emergency departments.² We are ready to work with other groups of providers who would like to develop a similar process.

Introduction

At the heart of any service will be the encounter or consultation between a service user and a care giver. We recognise the central importance of nurturing and sustaining this relationship in order to provide effective care. For many disadvantaged groups, clinical encounters and contact with service providers are still too often characterised by suspicion, indifference and occasionally hostility, rather than dignity and respect.

In this approach, generosity, kindness and compassion combine with a passionate commitment to professional quality to become the defining characteristics of health services for homeless and multiply disadvantaged people. These standards will be regularly reviewed and updated.

Background – national context

“Inclusion Health is a research, service, and policy agenda that aims to prevent and redress health and social inequities among the most vulnerable and marginalised in a community.”³

Health equity goes beyond inequality to embrace the ideal of social justice. In the words of Michael Marmot’s World Health Organization Commission on Social Determinants of Health, “where systematic differences in health are judged to be avoidable by reasonable action they are, quite simply, unfair. It is this that we label health inequity. Putting right these inequities – the huge and remediable differences in health between and within countries – is a matter of social justice”.⁴

Significant progress was made in the early 2000s to improve the social gradient in life expectancy⁵ across the population. However, progress has stalled since then. Health inequalities persist, with the morbidity slope becoming a cliff edge of hugely increased indices of ill-health for people sleeping rough and people excluded from society.⁶

The impact of austerity is becoming increasingly apparent, with social care provision at the point of collapse and huge strains on the NHS. Inclusion Health populations reveal the gaps in provision between fragmented services defending siloed and dwindling budgets. They reveal care that is too often characterised by crisis management at multiple disconnected points of episodic intervention, so that excluded people end up in the most expensive parts of the system – hospitals and prisons.⁷

Socially excluded groups are often invisible in national data sets. This may be in part because of the impact of transient lifestyles or the complexity of their problems. There are also few questions to help identify them in national health surveys. There are limited definitive statistics on access to healthcare for socially excluded people, but the literature indicates that points of access and service usage vary according to group, and the level and complexity of need.⁸

Many socially excluded people have low health aspirations and poor expectations of services, and get little opportunity to shape their care.⁷ There is a growing awareness of hidden costs to the NHS – the annual cost to the NHS of the failure to address health inequalities is estimated by the Institute of Health Equity to be £5.5 billion.

The 2010 Marmot Review, “Fair Society, Healthy Lives”, states: “To reduce the steepness of the social gradient in health, actions must be universal, but with a scale and intensity that is proportionate to the level of disadvantage. We call this proportionate universalism.”⁹ Closing the gap in health inequalities requires outcomes for the most disadvantaged to improve faster than those for the most advantaged.

The Health and Social Care Act 2012 introduced, for the first time, statutory duties on NHS commissioning organisations to have regard to the need to reduce health inequalities in access to and outcomes achieved by services, and to integrate services where this will reduce inequalities. The National Inclusion Health Board, together with the Royal College of General Practitioners, produced commissioning guidance, based on this duty.¹⁰ However, organisations struggling with austerity measures may overlook this duty, and it is not clear how they may be held to account.

Health professionals are increasingly aware of their responsibility for health equity, and all the professional bodies have collaborated with the Institute for Health Equity to describe how their members can contribute to challenging inequality.¹¹

In 2014 the NHS came together to produce the Five Year Forward View¹² – a shared ambition for the future. Sustainability and Transformation Plans are intended to be the method of achieving these ambitions. “Place-based planning” appears intended to replace competition with integration and collaboration. The direction of travel appears to be towards “accountable care organisations”, in which the entire health budget for a defined population is managed by one organisation. But the 2012 legislation has not been repealed. Leaders of NHS providers, for instance, find themselves under significant pressure from regulators to improve organisational performance. This means focusing primarily on their own services and finances rather than working with others for the greater good of the local population. In this context, incentives for NHS providers to work together can be weak. The very real danger is that organisations take a “fortress mentality” instead, acting to secure their own future regardless of the impact on others. The dissonance between place-based planning and the continuing focus on organisational performance in the NHS is therefore stark.¹³

The vision of Public Health England (PHE) expressed through the Public Health Outcomes Framework (PHOF) is “to improve the health of the poorest fastest”. The Faculty calls on public health professionals to ensure that the needs of excluded groups are included in Joint Strategic Needs Assessments (JSNAs) and championed through Health and Wellbeing Boards. The Scottish Public Health Network provides an excellent example of active engagement of public health in tackling homelessness.¹⁴

PHE published its Strategic Plan in 2016. The plan sets out how the organisation intends to protect and improve the public’s health and reduce inequalities over the next 4 years. The Plan builds on the Shared Delivery Plan, the Five Year Forward View, and From Evidence into Action.¹⁵ But the vision of Directors of Public Health being the local champions of Inclusion Health has yet to be realised. The shift of public health teams into local authorities, along with budgets for drug and alcohol treatment and sexual and reproductive health, seems to have largely resulted in a narrow focus on the housed population.

The Care Act 2014 includes a requirement to assess the needs of anyone who appears in need of care or support, with Safeguarding Adult Boards to protect adults from neglect and abuse. This may provide an opportunity to improve support for some vulnerable homeless people, but doubt remains that this really means a new deal for homeless people because needs still need to arise from a physical or mental health issue.¹⁶

The London Homeless Health Programme is part of the Healthy London Partnership and has developed commissioning guidance for London, including 10 commitments to improve health outcomes for people experiencing homelessness.¹⁷

Marginalised groups reveal fractures in the planning of health and care services. An excellent example is the paucity of services to identify and treat severe alcohol dependency and particularly alcohol-related brain damage. This is a common feature of long-term homelessness, but appropriate services are rare, despite clear guidance from a collaboration of medical Royal Colleges.¹⁸

In addition, austerity measures are having a devastating impact. Cuts to local authority funding are bringing the social care system to the brink of collapse in many areas, while flat-line funding for the NHS against rising demand deprives the system of any financial flexibility to innovate. There is great concern from Faculty members that services for the most vulnerable are at particular risk.

Health of people experiencing homelessness

The annual cost of unscheduled care for homeless patients is eight times that of the housed population¹⁹ and homeless patients are overrepresented amongst frequent attenders in Accident and Emergency (A&E) departments. High costs are associated with multi-morbidity, but can mask the fact that many homeless people have poor access to healthcare, with less resource allocation than they need. Despite this expenditure, the average age of death for homeless patients is just 43 for women and 47 years for men²⁰ and is associated with the reduced quality of life caused by multi-morbidity.²¹ Standardised mortality ratios for excluded groups, including homeless people, are around 10 times that of the general population.²²

The prevalence of multi-morbidity increases with deprivation and has an onset 10-15 years earlier in deprived groups than in the most affluent.²³ Homelessness is an independent risk factor for premature mortality²⁴ and is associated with extremes of deprivation and multi-morbidity.

There is a growing understanding, supported by international research,²⁵ that chronic homelessness is an associated marker for tri-morbidity, complex health needs and premature death. Tri-morbidity is the combination of physical ill-health with mental ill-health and drug or alcohol misuse. This complexity is often associated with advanced illness at presentation, in the context of a person lacking social support who often feels ambivalent about both accessing care and their own self-worth. Tri-morbidity often has its roots in histories of complex trauma, including high levels of child neglect and abuse, that impact on developmental trajectories and mental health. The Five Year Forward View for Mental Health states that people of all ages who have experienced traumatic events, poor housing or homelessness, or who have multiple needs such as a learning disability or autism, are at higher risk of mental illness.²⁶

Oral health problems are very common amongst homeless populations. 32% of people who are homeless report dental pain.²⁷ This population has a greater number of missing and decayed teeth and fewer filled teeth. Almost half feel ashamed or embarrassed about their teeth. Like all successful services for people experiencing homelessness, oral health services need to be informal, adapt to patient needs and accommodate chaotic lives. The Scottish oral health improvement homelessness programme Smile4Life²⁸ recommends a three-tiered approach to providing dental care for the homeless: emergency dental services, one-off single-item treatments without a full course of treatment, or the option to receive routine dental care.

Simply housing people who have been long-term homeless (although an essential first step) does not, of itself, resolve the underlying problems. When homeless people die they do not commonly die as a result of exposure or other direct effects of homelessness: they die of treatable medical problems, HIV-related disease, liver and other gastrointestinal disease, respiratory disease, or acute and chronic consequences of drug and alcohol dependence.²⁹

There is increasing concern about an escalation in enforcement measures targeting people experiencing homelessness. Arrests, antisocial behaviour orders and assertive street outreach combine with benefit sanctions to displace homeless people without evidence that this improves outcomes.³⁰ The costs of failing to address single homelessness in England and Wales have been estimated by Crisis as £1.38 billion annually.³¹ Housing First is supported by a growing evidence base, particularly for those with long-term and multiple needs. In every setting, integrated, multi-disciplinary care is the most effective approach.³

Health of Gypsies and Travellers

Who are Gypsies and Travellers?

“Gypsies and Travellers” is a commonly used catch-all term that includes people from a variety of groups, all of whom were – or are – nomadic. These include: Romany (English/Welsh) Gypsies (the majority group in England and Wales), Scottish Gypsies/Travellers, Travellers of Irish heritage (Irish Travellers), Roma, Fairground and Show people, Circus people, New Travellers, and Bargee and water craft/canal boat Travellers.

Today, although nomadism/“travelling” is an important part of Gypsy and Traveller people’s culture and history, the word “Gypsy” or “Traveller” is more accurately a description of ethnic identity and distinct culture(s) – social organisation, value system, shared history, language, traditions, etc. – rather than a description of actual daily activities or an identifier of nationality. An estimated two-thirds of Gypsies and Travellers in the UK today live among the “settled community” in permanent housing, with a further significant portion living on permanent sites, either privately or publicly provided. Others, due to national shortages of sites, live on unauthorised sites (as of 2011, approximately 20% of Gypsy/Traveller caravans are stationed “unlawfully”, rendering the occupants technically homeless).³² The nomadic aspect of their culture is expressed in periods of “travelling” from their home base to attend family events and annual fairs, rather than being a constant feature. Settlement in housing is often due to an inadequate supply of Traveller sites rather than preference.³³

Gypsies and Irish Travellers are recognised ethnic groups under UK law, and were included as such in the National Census for the first time in 2011.

Under the Race Relations Act, Romany Gypsies and Irish Travellers are recognised as minority ethnic groups, and should be afforded protection in law against discrimination.

The following points provide important context to issues of Gypsy and Traveller health

Gypsies and Travellers have significantly poorer health outcomes compared with the general population of England and with other English-speaking ethnic minorities. They are frequently subject to racial abuse and discrimination.³⁴

All Gypsies and Travellers have the same rights as other UK residents to access NHS and social care services, whether they are nomadic or living in permanent settlements.

There is a serious under-provision of official trailer sites for Gypsies and Travellers across the country and so community members may find themselves living in irregular locations, for instance, under motorways or next to sewage works. Consequently, they face health hazards uncommon in the general population, for example, lack of sewage disposal and limited access to water.³⁴

Many Gypsies and Travellers are not literate, therefore information concerning treatment and appointments may need to be explained. Ethnic monitoring based on self-categorisation or self-disclosure may well result in under-reporting, with many Gypsies and Travellers reluctant to disclose their identity due to fears of prejudice, and a deeply ingrained mistrust of authority.

A 2012 report by the Ministerial Working Group on tackling inequalities experienced by Gypsies and Travellers³⁵ confirmed that they have the lowest life expectancy of any ethnic group in the UK and continue to experience high infant mortality rates (18% of Gypsy and Traveller women have experienced the death of a child)³⁶, high maternal mortality rates, low child immunisation levels (particularly where specialist Traveller Health Visitors are not available), and high rates of mental health issues including suicide, substance misuse issues and diabetes, as well as high rates of heart disease and premature morbidity and mortality.^{33,34,35}

In 2004, life expectancy was estimated at around 12 years less for Gypsy and Traveller women and 10 years less for men than in other populations.³⁶ The 2005 Leeds Racial Equality Council Baseline Census³⁷ found a greater disparity in life expectancy, with Gypsies and Travellers' average life expectancy being 50 years, compared with 78 years among the general population of Leeds. Only 2.3% of Gypsies and Travellers were aged over 60 years. More recent Health Needs Assessments (e.g. Bedfordshire NHS Trust,³⁸ NHS West Sussex³⁹ in 2010) suggest little improvement. As well as lower life expectancy, Irish Travellers have consistently lower healthy life expectancy and disability-free life expectancy than the general population.³³ Even after controlling for socio-economic status, Gypsies and Travellers, including those in housing, have poorer health outcomes and more self-reported symptoms of ill-health than other UK resident English-speaking ethnic minority groups and economically disadvantaged White UK residents.^{33,40}

Travellers experience worse health and have significant health needs, yet are less likely to receive effective, continuous healthcare.³³ Identified barriers to healthcare access^{33,41} include inequalities in registration with GPs (due to discrimination, mismatch in expectations, the perception that they will be “expensive patients”, and the reluctance of GPs to visit sites), poor literacy, and lack of “cultural awareness/competence” amongst service providers. There is significant evidence of missed opportunities for preventative healthcare, particularly among Gypsy and Traveller men, and for effective treatment for pre-existing conditions,^{40,42} contributing to the high rate of premature mortality.

Travellers have low expectations about health, accepting long-term illness and ill-health as a normal part of life, an inevitable consequence of adverse social experiences and perceptions of hostility and racism.^{43,44} Just under half of Gypsies and Travellers in the East of England⁴⁵ perceive their own health to be good or very good, compared with 77% of the general population.

For Gypsies and Travellers a house may not be the same as a home. In fact, for this group, living in a house has been associated with poorer health, long-term illness and high rates of anxiety and depression.⁴⁰ Despite Gypsies and Travellers being a recognised ethnic group, official statistical data are not collected on their health needs, resulting in a lack of reliable national and local data, alongside the general lack of awareness of Gypsy and Traveller health issues in local health services.⁴⁶ Most data are based on health studies.

A recent simple cost-benefit analysis⁴⁷ based on current experiences of Gypsy and Traveller families shows that an improved health and social care pathway not only offers clear benefits to Gypsy and Traveller people themselves, but delivers greatly reduced costs to health and social care services. Up-front investment, for example in appropriate social work engagement, or in GP outreach work, can pay for itself many times over in the longer term.

Oral health of Gypsies and Travellers

Poor dental health is also a problem for this population. Gypsies and Travellers have a high level of unmet need, low rates of dental registration and very little use of preventative dental services, with more disadvantage being experienced by Gypsies and Travellers on unauthorised and transit sites.⁴⁸ There is anecdotal evidence⁴⁹ that Gypsies and Travellers delay access to medical and dental health services, which leads them to suffer significant oral and dental health problems that may result in hospital intervention. There is some suggestion from local Gypsy and Traveller Accommodation Assessments and casework that access to dental care and oral health promotion for Gypsies and Travellers has worsened. In a Friends, Families and Travellers-delivered “Collaborative Programme to Improve the Oral Health of the Gypsy and Travelling Communities in Sussex”,⁴⁹ determinants of poor oral health were identified as: lack of accessible, culturally appropriate information; distrust and negative attitudes among the population and among professionals; a historical lack of dental health services reaching out to the Gypsy and Traveller community; raised levels of fear and anxiety about visiting the dentist; and challenges associated with being a transient population.

Guidance for organisations working with Gypsy and Traveller communities

Examples of guidance for organisations working with Gypsy and Traveller communities include: the Republic of Ireland Pavee Point Primary Health Care for Travellers Project,³² the Save the Children Early Years Outreach Practice,⁵⁰ Friends, Families and Travellers guidance for health practitioners,⁵¹ and the Department of Health guidance on developing cultural competence of health professionals working with Gypsy and Traveller communities.⁵² Examples of practice for improving immunisation uptake among underserved groups across the European Union (with specific examples for the Roma population) can be found on the website of a European Centre for Disease Prevention and Control meeting on immunisation in underserved populations.⁵³ Additional good practice examples can be found in the 2008 Race Equality Foundation briefing paper.³⁴

Recommendations on improving access to healthcare for Gypsies and Travellers are well articulated by groups such as Friends, Families and Travellers with Leeds GATE,⁵⁴ which has also produced guidance on the inclusion of Gypsy and Traveller health needs in JSNAs.⁵⁵ Friends, Families and Travellers is also a member of the Department of Health-sponsored Voluntary Community and Social Enterprise Health and Well-being Alliance promoting inclusion health.

Health of vulnerable migrants

People migrate to the UK for diverse reasons, which makes migrants a very heterogeneous group. Vulnerable migrants include people who are seeking asylum, refugees, those with humanitarian protection and their families, separated children, Roma, Gypsies and Travellers, people who are undocumented, refused asylum seekers and those who are trafficked for various forms of forced labour, sexual exploitation and modern slavery.

The term “vulnerable” is used to describe those who have been adversely affected by circumstances leading to or resulting from migration, and refers to their circumstances rather than an attribute of people themselves.⁵⁶ New migrants from these different groups frequently face adversity before, during and after arrival in the UK, resulting in complex service needs.⁵⁷

Health problems of vulnerable migrants are frequently related to destitution and lack of access to services, rather than to complex or long-standing ill-health.^{58,59} Expert consensus asserts that European-wide failure to ensure access to healthcare for vulnerable migrants is contrary to existing treaty agreements and human rights standards, and is not cost effective.⁶⁰

Despite concerns voiced by the Faculty, the “Overseas visitors NHS cost recovery programme” is now a legal obligation on NHS Trusts. Although immediately necessary and urgent treatment should always be provided, concerns remain that vulnerable migrants may be dissuaded from accessing care because they fear charges or coming to the attention of immigration authorities. This concern is well founded: sharing of NHS data by NHS Digital with the Home Office, for the expressed purpose of finding undocumented migrants, is morally wrong, and opposed by this Faculty. Information given to healthcare providers by those seeking healthcare should be treated under principles of normal medical confidentiality (in which information is shared only where there is an immediate, identifiable risk of harm). To do otherwise is contrary to the role of healthcare provider.

Certain health services are currently free for everyone: primary care, A&E, services for sexually transmitted infections (STIs) including HIV, treatment for tuberculosis (TB) and compulsory psychiatric treatment. Migrants from the European Union, refugees and asylum seekers with an active claim have full access to the NHS. Some migrants (e.g. refused asylum seekers not supported by the Home Office or local authority, undocumented migrants) are liable to be charged for secondary care. Migrants often face barriers when they try to access health services, as NHS entitlement rules relating to immigration status are complex and have given rise to much confusion. Everyone must be given “immediately necessary” and “urgent” hospital treatment regardless of their immigration status and ability to pay; a charge may be levied later if the patient is found not to qualify for free care. New exemptions from charges have been recently introduced in respect of services provided to migrants as a consequence of torture, female genital mutilation, domestic violence and sexual violence. Children looked after by a local authority, including those who are unaccompanied, are also exempt.⁶¹

Refugees and asylum seekers may have high levels of psychological ill-health, which is not necessarily due solely to their experiences of conflict and related traumatic events but is also likely to reflect the socio-political conditions in host countries that create discrimination and marginalisation. Improving these conditions would improve mental health outcomes.

Immigration detainees have been found to have high levels of post-traumatic stress that are very closely associated with their detention, and which frequently lead to anxiety, depression, self-harm, suicidal ideation and suicide attempts. Immigration removal centres (IRCs) are very challenging settings in which to provide mental health and wellbeing services. The mental wellbeing of people detained in an IRC is challenged by detention itself, and the risk to their wellbeing increases with the length of detention.⁶²

Survivors of torture and trafficking have often experienced extreme circumstances in which they have been exposed to uncontrollable and unpredictable events, which can result in severe and longer-term post-trauma disorders.⁶³ Migrants' high risk of homelessness and destitution creates circumstances that further exacerbate their already fragile mental health.

Oral health of vulnerable migrants

Migrants are entitled to NHS dental treatment. What is often much more problematical and difficult to ascertain is whether they are eligible to free or subsidised NHS treatment via the exemptions detailed on the Practice Record (PR) form (this is the blue NHS charges/acceptance of treatment form used by NHS dentists and patients to declare that they want NHS dental treatment, and that unless they are in one of the listed categories they will have to pay standard NHS dental fees).

Migrants will often not be able to speak, read or understand English fluently. This can cause problems with consent and explaining the options available to them, obtaining an adequate and relevant medical history, and ascertaining payment status or explaining payment options. In particular, when dealing with family or structured groups where language barriers exist between the group and the healthcare provider, having an independent interpreter should be considered the gold standard, as the interpreting members of the group may have a different agenda from that of the patient, particularly if payment or other such issues are concerned. Commissioners should give specific guidance to service providers of what to do when a vulnerable migrant presents with, for example, pain or swelling, but whose payment status cannot be ascertained at that particular point in time. Clinicians will need to feel supported by their institutions in providing care to vulnerable patients presenting in need of healthcare.

Commissioning guidance for vulnerable migrants has been developed in collaboration with the mental health organisation Mind and Faculty members,⁶⁴ and the Department of Health has commissioned detailed guidance on including vulnerable migrants in JSNAs.⁶⁵

Health of sex workers

Sex workers are likely to experience poor health because of the risks associated with their work.

Female sex workers in London have a mortality rate that is 12 times the national average.^{7,66} Up to 95% of female sex workers are problematic drug users. 68% of female sex workers meet the criteria for post-traumatic stress disorder – this is in the same range as victims of torture and combat veterans undergoing treatment. Street sex workers have significantly higher rates of health service use compared with the general population, reporting visiting the GP 8.5 times (compared with 4 times for the general population), A&E 2.5 times, an STI clinic 2.7 times, an inpatient clinic 2 times and an outpatient clinic 4.3 times in the previous year.^{7,66}

Despite frequent use of health services, a comparatively low percentage of female sex workers have had routine health checks such as cervical screening, or attend antenatal checks when pregnant. Psychological and institutional barriers to accessing healthcare include: fear of criminalisation, institutional factors (e.g. opening hours, location), stigmatisation and discrimination.

Oral health of sex workers

In a sample of 207 trafficked women, 58% reported having dental problems described as “tooth pain”.⁶⁷ Many trafficked sex workers in this study had experienced physical violence, with 8% having experienced direct assault to the face, including being punched, slammed into a wall or hit with hard objects including bats. Such trauma will have implications for oral health. If physical violence or modern slavery is suspected, then adult safeguarding protocols should be followed by the dental practitioner. There is very little literature available to describe the oral health needs of the sex worker population and the Faculty recommends further research in order to develop services to meet the needs of this vulnerable population.

Standards for integrated care to address health inequity

Addressing health inequity is a form of secondary prevention – reducing the harm resulting from long-standing and increasing inequality in society. We recognise that in the long term primary prevention is the only rational response – reducing poverty and inequality, particularly in childhood, to tackle the root causes of homelessness and multiple disadvantage. By highlighting the direct costs to the healthcare system resulting from multiple disadvantages we hope to inform and support the drive to address inequality in our society.

Shared standards will improve care

Integrated care is central to overcoming the problem of fragmented and uncoordinated services.⁶⁸ People with a lived experience of exclusion should be considered experts by experience and their involvement in planning and delivery of services is a core value of the Faculty, increasingly recognised by NHS England (NHSE),^{69,70,71} and exemplified by Pathway's Experts by Experience Involvement Handbook.⁷² A shared integrated care plan/formulation with individualised goals and strengths will be a key tool. Attention to the needs of excluded communities along with understanding of their culture, integration of services at the point of delivery, and care providers working towards shared outcomes can result in better health outcomes for individuals, their families and communities, as well as reduced costs.

For example, the Department of Health's Office of the Chief Analyst highlights the potential for developing a new model of healthcare delivery for homeless patients, based on the highly successful service provided in Boston, USA.¹⁹ This model is of a fully integrated primary and secondary healthcare service including specialist primary care, outreach services, intermediate care beds and in-reach services to acute beds.

The latest international evidence is summarised in a Lancet paper titled "What works in Inclusion Health: overview of effective interventions for marginalised and excluded populations".³ The key findings are: that integrated multi-component care – summarised as individual care coordination supported by a multi-disciplinary team – is the best healthcare response for excluded groups; involvement of experts by experience is vital; and ultimately the solution is eradicating child poverty.

Improving care requires that education in Inclusion Health should be included in all undergraduate clinical courses, and in postgraduate specialist training for all clinicians. Promising examples include the Royal College of Physicians' online introduction to the social determinants of health,⁷³ and the Faculty MSc Inclusion Health module, with University College London's Institute of Epidemiology and Health Care.⁷⁴

Health inequalities duties

The Health and Social Care Act 2012 imposed a number of health inequalities duties that are of particular relevance to service provision for marginalised groups. These duties apply to the Secretary of State for Health, NHSE and Clinical Commissioning Groups (CCGs).

Secretary of State

“In exercising functions in relation to the health service, the Secretary of State must have regard to the need to reduce inequalities between the people of England with respect to the benefits that they can obtain from the health service.” (Section 1C of the NHS Act 2006, as amended by the 2012 Act.) The phrase “health service” incorporates both the NHS and public health. This duty will also impact on the Department of Health in terms of its role to establish NHS and public health systems.

NHS England

The Board must have regard to the need to reduce inequalities in access to health services and the outcomes achieved by health services (Section 13G).

Clinical Commissioning Groups

CCGs must also have regard to the need to reduce health inequalities in access to and the outcomes achieved by services (Section 14T), and to provide services in an integrated way where this will reduce health inequalities in access and outcomes (Section 14Z1). This service integration is not confined to primary and secondary healthcare, but includes social care and health-related services.

“Health-related services” are broadly defined and can include services related to the wider determinants of health, such as housing, fuel poverty, debt, education, employment, etc. The practical effect should be that services are integrated around the needs of the individual. There are equivalent integration-related duties for NHSE (Section 13N) and for Monitor (Section 62).

Planning

The Act requires NHSE (Section 13T) and CCGs (Section 14Z11) to include in their business plan and commissioning plans, respectively, an explanation of how each proposes to discharge their duties as to reducing inequalities.

Reporting

The Secretary of State (Section 247D), NHSE (Section 13U) and CCGs (Section 14Z15) are required to include, in their respective annual reports, an assessment of how effectively they have discharged their duties as to reducing inequalities.

Assessment

The Secretary of State, having considered NHSE's annual report, is required to make an assessment of how well the Board has discharged its duty as to reducing inequalities (Section 13U). NHSE is required to undertake a similar annual assessment of how well CCGs have discharged their duty as to reducing inequalities (Section 14Z16).

Measurement of outcomes

Outcomes for excluded populations need to be an integral part of the NHS, PHOF and Adult Social Care Outcomes Framework (ASCOF) allowing measurement of the proposed indicators within homeless, vulnerable migrant, sex worker, and Gypsy and Traveller populations. This should start with ensuring that these groups can be identified and recorded by all NHS and Social Care computer systems to a shared typology.

Detailed clinical standards for inclusion healthcare in different specialties and situations

In this section we set out clinical standards for Inclusion Health services in general, and specific standards for a range of specialist services that should be accessible to excluded groups.

These standards will be regularly reviewed and we encourage suggestions for improvement. Coordinated service provision across primary and secondary care including mental health treatment is a requirement of these standards. Provision of good-quality primary care in the absence of integrated good-quality secondary and mental healthcare would not meet these standards.

We start by setting out general clinical standards relevant to all settings. We then present specific additional standards for primary care and for a range of other services important or relevant to improving Inclusion Healthcare. The Faculty will offer, on request, evaluations against these standards for service providers who are members of the Faculty.

Clinical standards in any setting

Core values shared by Faculty members centre around valuing each individual, building a respectful and trusting relationship and working with their priorities to a position of hope.

“It is more important to know what sort of person has a disease than to know what sort of disease a person has”

Hippocrates

“Those who have a ‘why’ to live, can bear with almost any ‘how’”

Viktor E. Frankl

Section 1. Our values. Principles for clinical standards in inclusion healthcare

- 1.0** Continuity – a trusting and respectful relationship formed with a familiar clinician and team.
- 1.1** Ease of access also requires walk-in provision, in-reach to hostels and street outreach to people sleeping rough – commonly described as “Street Medicine” and promoted by the Street Medicine Institute.⁷⁵
- 1.2** Integrated, multi-disciplinary collaborative care is central to effective care because many homeless people present with multiple healthcare needs.
- 1.3** Person-centred care with involvement of experts by experience in planning and delivery.
- 1.4** Cultural competence and sensitivity.
- 1.5** The Recovery approach developed by users of psychiatric services should be incorporated into the design of all services. Summarised by the phrase “Hope, Agency and Opportunity for all”,⁷⁶ this seeks to make shared decision making the norm: “No decision about me without me”.⁷⁷
- 1.6** Where specialist services are provided they should act as a catalyst to improve care throughout the local health service.
- 1.7** Inclusion Health services should provide a bridge linking hospitals and community care through hospital in-reach services.
- 1.8** Inclusion Health services should work closely with public health departments, particularly in relation to serious communicable diseases (e.g. TB⁷⁸ or blood-borne virus transmission).
- 1.9** Services should actively seek to offer treatment to vulnerable migrants and those with no recourse to public funds.
- 1.10** Services for homeless people should include the provision of “respite care” (now in over 50 cities in North America and Europe) – community-based residential medical facilities for homeless people with significant and complex healthcare problems. This could be achieved cost-effectively through joint working with local hostel providers and the voluntary sector. These services improve outcomes and reduce subsequent unscheduled hospital admissions.^{79,80} Pathway has published standards for Medical Respite in England.⁸¹

All services meeting these standards should include the following auditable standards:

- 1.11** Regular involvement in, and where necessary leadership of, multi-agency planning for people sleeping rough.
- 1.12** Visible service user involvement in planning and evaluation of services.

- 1.13** Coordination of the healthcare of excluded people as they move between different organisations and settings (hostels/drop-ins, shelters for homeless families, Gypsy and Traveller sites, etc). This may be best achieved via a named liaison worker and supported by a shared integrated care plan/formulation emphasising individual goals and strengths.
- 1.14** Child and family services to be linked to homeless family hostels, with children treated and recorded as individuals, not nameless adjuncts to the parent. Useful guidance for non-specialists on safeguarding vulnerable families is available from the Queen's Nursing Institute.⁸²
- 1.15** Coordinated healthcare for homeless people in hospital settings by collaboration with ward rounds for homeless people and attending multi-agency care planning meetings. For all excluded groups, informative and timely discharge summaries should be provided to primary care as standard, even when the patient self-discharges.
- 1.16** Plans for assertive outreach for non-engaged clients in each area; e.g. specialist clinicians with flexible hours, able to provide street outreach; specialist Health Workers/Health Visitors for Gypsies and Travellers.
- 1.17** Using guidance on the Mental Capacity Act, Mental Health Act and Safeguarding Alerts for adults at risk of abuse, and in assessing rough sleepers who refuse care. This guidance may also help in situations in which vulnerable people are not being offered care, and is available on the Pathway website.⁸³
- 1.18** Training and protocols to support active identification and referral of victims of human trafficking and modern slavery, using sensitive initial approaches⁶³ leading to referral via the national referral mechanism.⁸⁴ Further detailed guidance is provided in the PROTECT report⁸⁵ and human trafficking foundation guidance.⁸⁶
- 1.19** Recording of housing status with regular review.
- 1.20** Recognition and support of the need to build an evidence base for what works for socially excluded groups. Participation in documenting, researching and publishing on the health hazards of exclusion, evaluations of service delivery models (including models of preventative healthcare), continuous monitoring of longer-term outcomes and action research approaches to service development.
- 1.21** Education and involvement in undergraduate and postgraduate training of medical, nursing, dental, psychological therapy and social work students. Develop links with relevant professional bodies.
- 1.22** Promotion and encouragement of accessible provision of mental health, dental and podiatry care.
- 1.23** Promotion of Inclusion Healthcare as a viable and attractive career choice for staff.

Section 2. Specific standards for particular groups and settings

Standards for health services for vulnerable migrants

Standards for commissioners of services for vulnerable migrants have been developed by the Faculty in collaboration with Mind, and should be consulted for detailed guidance.⁶⁴

These Standards should apply to all vulnerable migrants, including undocumented migrants and especially victims of trafficking and slavery.

- 2.00** Appropriate skills. Health workers need to work flexibly and creatively with vulnerable migrants and have an awareness of the impact of immigration, torture, detention and the asylum determination process on mental health. Assessments should recognise natural psychological reactions to highly abnormal experiences and not over-medicalise what may be appropriate responses.
- 2.01** Gender and cultural sensitivity. For a comprehensive set of guidelines see “Guidance for commissioning health services for vulnerable migrant women”.⁵⁶ Culturally competent staff should be available, as this promotes access and understanding of cultural nuances, alongside ongoing training of the whole workforce on cultural competencies and working with diverse and marginalised communities.
- 2.02** Protection and security measures are a priority when planning care for especially vulnerable migrant groups, such as survivors of trafficking and modern slavery, women and girls fleeing forced marriages and genital cutting or mutilation.
- 2.03** Interpreting, advocacy and communication. Vulnerable migrants may need additional support in accessing services due to language difficulties, poverty, illiteracy, low confidence or lack of familiarity with the system. The use of informal interpreters, family members, friends and children should be avoided. Staff must be appropriately trained to be confident and competent in working with interpreters.
- 2.04** Literacy. Migrants (particularly older migrants, women, Roma, Gypsies and Travellers) may be illiterate in their first language, so DVD, podcasts and audio resources can be more effective means of conveying health promotion messages. Social media and texting are useful ways of maintaining contact with mobile clients.
- 2.05** Peer mentor programmes may be particularly helpful in providing support and advocacy for migrant people.
- 2.06** GP registration. GPs may register anyone as an NHS patient, as long as they do not discriminate (see standards for primary care and for GP receptionists, below). However, sensitivity is required, as some patients will fear that registration will draw attention from the UK Border Agency or other official bodies. Doctors of the World has produced an excellent toolkit to help practices provide confidential and welcoming services for all their patients, including refugees, asylum seekers and undocumented migrants.⁸⁷
- 2.07** Collection of country of birth information is important in considering risks for particular health conditions.

- 2.08** Primary care practitioners play a vital role in early identification of infectious diseases. Early identification of risk and diagnosis of infection can improve health outcomes.⁸⁸ Services for homeless migrants should promote and facilitate screening and treatment, e.g. for HIV and hepatitis B and C, and, where appropriate, haemoglobin electrophoresis and full antenatal screening. The PHE online Migrant Health Guide (launched January 2011) provides both a checklist to extend the standard new patient check for migrant patients and country-specific advice on infectious disease risks.⁸⁹
- 2.09** Healthcare practitioners should ensure that migrants are offered full immunisation according to the UK schedule. PHE provides regularly updated guidance on vaccinations of individuals with uncertain or incomplete immunisation status.⁹⁰
- 2.10** Services should offer access to the full range of primary healthcare interventions, with referral to secondary care where appropriate. It is not the responsibility of the GP to ascertain eligibility for secondary care. Hospitals and primary care providers should be aware that antenatal care should always be considered immediate and necessary, although the hospital may issue a bill.
- 2.11** Mental health services for vulnerable migrants should be provided according to the detailed specification published by Mind.⁶⁴ Stigma surrounding mental illness may be particularly marked in some migrant communities and may also inhibit some people from accessing services. Community-based, culturally appropriate health awareness programmes can reduce this stigma. Improving Access to Psychological Therapies (IAPT) services may not address the more complex long-term needs of vulnerable migrants, and other options need to be available.
- 2.12** Migrants often come from countries with health and social care services very different from those in the UK, and they may have no or poor experience of primary and mental health services. Whole-population services that recognise migrants' needs are more likely to reach them.
- 2.13** Liaison with voluntary sector organisations such as the Refugee Council can enhance support for vulnerable migrants.⁹¹
- 2.14** Documentation of evidence of torture or violence. Health workers may be requested to provide a medical report. Such reports should be confined to those areas on which the health worker is qualified to give an opinion, for example, a person's medical history and use of health services. Documentation in a medico-legal report of physical and psychological sequelae of torture requires specialist knowledge of the Istanbul Protocol.⁹²

Standards for health services for sex workers

Sex workers are likely to intersect many of the groups identified within the Inclusion Health agenda, and great care should be taken by health professionals to understand and address the multiple and complex health and social care issues that they are likely to present. Good healthcare services have greater potential for reducing the number of people in sex work than criminal justice approaches.⁹³

- 2.15** As with other excluded groups, the attitude of staff can frequently discourage engagement of sex workers with health services. Awareness training for A&E, primary care and clinical staff working within criminal justice settings should be widely available. This training can be accessed through numerous sex worker support services throughout the UK. See www.uknswp.org for more information.
- 2.16** Specialist outreach services for sex workers are vital to improving access⁹⁴ and should include enhanced access to primary care and not be confined to sexual health and contraception. Depending upon local epidemiology, services should also create pathways into treatment for long-term conditions such as TB and respiratory conditions, as well as mental health and specialist addiction services.
- 2.17** Criminal justice services can provide an excellent opportunity for engagement with healthcare if there is an appropriate non-judgemental attitude. Sex workers who are homeless and live chaotic lifestyles often have untreated conditions. When criminal justice services offer healthcare this can be a positive starting point at which to assess general health status, stabilise conditions and begin medication.

Standards for health services for Gypsies and Travellers

- 2.18** The Department of Health should issue a national “data change notice” to include Gypsies, Roma and Travellers alongside the 16+1 other ethnic categories that are monitored by the NHS. This would bring the NHS in line with the inclusion of “Gypsy and Traveller” as an ethnic category in the 2011 Census.
- 2.19** “Gypsy or Traveller” should be included as an ethnic category in national health surveys, such as the ONS General Lifestyle Survey.⁹⁴
- 2.20** Services should be designed and commissioned in collaboration with communities, through inclusion in Health and Wellbeing Boards and consultation for JSNAs.
- 2.21** Targeted preventative care. There is often a poor take-up of preventative healthcare by Gypsies and Travellers, particularly among men, with conditions usually well advanced before any type of healthcare is sought. Targeted services are needed to increase male engagement in preventative healthcare and to fast-track Gypsies and Travellers to preventative services supported by peer/community health promotion workers.
- 2.22** Commissioning of dedicated or specialist health workers. Research suggests that community members would welcome advice and care provided by trained/qualified community members, with trust in the individual being important for engagement.⁹⁵

Culturally appropriate educational materials and the use of trusted community members as health advocates, including oral health (in line with work carried out with other Black and Minority Ethnic communities) are anticipated to reduce the negative health impacts of membership of Gypsy, Roma and Traveller communities. There should be support for initiatives that help Gypsies and Travellers to become health advocates, service providers and trainers within their own communities, for example the Irish Traveller Movement in Britain (IMTB) Level 2 NOCN Health and Community Engagement Course,⁹⁶ and Leeds GATE training. Friends, Families and Travellers has become a training centre for the Royal Society of Public Health (RSPH) Level 2 training in Health Awareness.

- 2.23** Improve the cultural competence of health service staff, for example by providing Gypsy and Traveller community-led training, including understanding the importance of kin-group responsibilities (e.g. family demands made by even quite distant relatives may be regarded as higher priority than professional expectations) and the impact this may have on care, attending appointments, etc.

Standards for children and family services for excluded groups

- 2.24** There should be a local health strategy jointly devised with social services and housing departments, under the new public health remit of local authorities.
- 2.25** Operationally, child and family services should include physical health, child mental health and social services, including child protection.
- 2.26** There should be clear care pathways between these services. Subsequent care requires evidence of follow-up and not being lost when returning to the community (when children and families are most vulnerable and in need of services).
- 2.27** Measurement of child outcomes across physical, developmental and psychosocial domains.

Standards for primary care

Services must be planned according to local and regional need. In some areas specialist services will be necessary. Where there are fewer excluded people, enhanced access to mainstream services may suffice, but the standards of care outlined should apply in every setting.

- 2.28** Information is key – ideally there should be a unified electronic record accessible wherever the patient is seen (e.g. EMIS or SystmOne). All patients must be registered at first consultation. Ideally and usually this should be full registration, unless the person is already registered with another primary care service, in which case temporary registration is acceptable. For those entitled only to emergency treatment from the NHS, an immediate and necessary registration should be completed. In this way, every patient is logged and costed and becomes visible to the NHS. Services which cannot register patients, such as nurse-led community services, should have achieving GP registration for all their patients as a primary goal.

- 2.29** The quality of information recorded can be enhanced by shared protocols, such as the EMIS and SystemOne protocols developed by Pathway.
- 2.30** Locally designed Key Performance Indicators (KPIs) may be better suited to specialist Inclusion Health practices than simply adhering to Quality and Outcomes Framework (QOF) standards. KPIs should cover the following areas:
- Managing long-term conditions to QOF standards.
 - Proactive management of selected patients with high needs by regular multi-agency meetings including local street outreach, statutory and non-statutory services.
 - Hospital in-reach ward rounds/visits for homeless patients where necessary in the local Acute and Mental Health Trusts.
 - Regular outreach clinics in local hostels and drop-in centres.
 - Collaboration with multi-agency review and care plans for all registered patients admitted to hospital twice or more in any 6-month period and, when necessary, those with a Combined Homeless Information Network (CHAIN) or other rough sleeping record in the same period.
 - All patients offered drop-in clinics with their presenting problem addressed first, but also offered health screening and access to treatment to include: physical health assessment, screening for dental/oral problems, blood-borne viruses, smoking, drug and alcohol problems, TB screening, screening for mental health problems, diet and exercise.
 - Regular review of a locally negotiated approach to ensure easy access, including drop-in clinics and outreach clinics at hostels and drop-in centres, to include primary care-based mental health treatment.
 - QOF or KPI funding thresholds should reflect the challenges of working with excluded groups.
- 2.31** There should be routine liaison with and provision of medical support to street outreach teams and provision of continuing care for recently housed and socially excluded patients, with a focus on enabling access to mainstream services.
- 2.32** Services should collaborate with case tracking, contact tracing, community treatment and public health measures, e.g. for TB, HIV, hepatitis C.
- 2.33** Concerted efforts need to be made to reach excluded groups and include them in routine vaccination programmes, with flexible outreach to improve coverage.

2.34 Standards for GP receptionists in primary care

Registration with a GP practice is vital to ensure patients access primary care, and are referred on for secondary care as necessary. People experiencing homelessness are known to experience barriers to GP registration. A card detailing rights to registration is available from Groundswell.⁹⁷ In partnership with the London Healthy Partnership, Pathway has developed a training package and guidance for GP receptionists, which is available on the Pathway website.⁹⁸

In summary, the guidance states that:

- Receptionists should be the patients' champion, ensuring that the most vulnerable patients in a practice's catchment area are able to access care.
- If a patient does not have ID this should not be a barrier to registration. Refusal of registration should occur only if a practice list is closed, or may be given if a patient lives out of area and the practice feels unable to accommodate this. All registration refusals should be recorded, and the patient should be given a letter to evidence the refusal.
- Receptionists should routinely ask if patients need assistance to fill in forms, and give help as required.
- Homelessness should be identified as early as possible in the registration, and recorded in the records.
- Even if a patient is street homeless every effort should be made to obtain a "care of" address, contact and emergency contact details, as for all patients.
- Every effort should be made to assist patients to be able to obtain and attend appointments with ease. Consideration should be made of personal or organisational barriers that may exist because of: language or literacy issues; mental health or addiction problems; lack of access to a phone/credit; or individual difficulties, e.g. the patient having a dog that they cannot leave.
- Patients should be made aware that they can bring support workers with them to appointments (and/or be referred to peer advocacy services as appropriate).
- Professional interpreting services should be used unless a patient is fluent in English. Interpreting services should be used in preference to family or friends, and face-to-face interpreting should be used in preference to phone interpreting wherever possible.
- Longer appointments should be routinely offered to all clients with communication difficulties and/or complex needs.
- Practice staff should become familiar with common cultural practices found in the practice population, and develop practice protocols to accommodate these.
- Leaflets signposting homelessness and other relevant services, in simple language, should be available within practices.
- Receptionists should be involved in actively gaining service user feedback. Service user feedback should be sought on registration processes and the reception experience.

Standards for mental health services

Many Inclusion Health patients have mental health problems and experience difficulty in accessing and maintaining therapeutic relationships with mental health services.

The particular vulnerability of those who have experienced traumatic events such as homelessness is recognised in the Five Year Forward View for Mental Health,²⁶ and the scandal of large numbers of long-term rough sleepers experiencing mental illness has been highlighted by St Mungo's.⁹⁹ There is a growing understanding that although psychosis is more prevalent amongst people experiencing homelessness, severe and enduring mental illness is not the main disease category. The mental health problems associated with social exclusion are predominantly anxiety and depression, complicated by complex childhood trauma and personality disorder, and underdiagnosed disabilities such as autism spectrum disorder, learning disability and acquired brain injury. Dependency on alcohol and/or drugs presents a common complication.

Standards for community mental health services

Where there are significant numbers of homeless or other excluded people, specialist services may be necessary; in other areas enhanced access to mainstream services may suffice. In both situations, services should be provided to the standards outlined. A willingness to work around relatively high rates of non-attendance at appointments will help to ensure that patients are not further excluded. It is crucial that mental health services are integrated with other health services and that there is good communication between them.

Assessments by mental health professionals can be pivotal in enabling someone who is homeless to access appropriate accommodation, or improve the ability of an existing housing service to understand and help someone. Mental health professionals should ensure that their assessments consider this and do not remain focused on gatekeeping access to particular treatments.

- 2.35** Services for homeless people should accept self-referral or non-health agency referral and respond to mental distress and dysfunctional behaviours. Diagnostic criteria should not be a means of gatekeeping services.
- 2.36** Complex trauma and personality disorders are significant drivers behind the poor mental health of homeless people, and the responses of mental health services and clinicians to this group should be designed with this in mind.
- 2.37** In areas with high concentrations of Inclusion Health patients, specialist services should be provided to ensure the necessary expertise is available and that there is flexible service provision.
- 2.38** All mental health services should be ready to work with people with drug and/or alcohol problems in addition to mental health issues, and mental health services should foster good partnerships with drug and alcohol services to ensure effective joint working. Mental health treatment should still be offered even when the patient does not wish to engage with substance use treatment.

- 2.39** Sometimes initial assessments will need to take place by outreach, for example to hostels, drop-ins, Gypsy and Traveller sites and especially the streets, and services must be able to provide this.
- 2.40** Symptoms of mental illness can perpetuate people remaining street homeless (or in another situation where they face significant risk), for example where paranoid beliefs lead to someone refusing help. In such a situation, an assessment under the Mental Health Act 1983 may need to be arranged by local social services and local mental health services, and this assessment may need to take place on the street or in another public area. This must not be refused on the grounds of lack of resources – this is merely a way of excluding from services some of the most vulnerable individuals in the homeless population.
- 2.41** Decisions around whether to proceed with mental health interventions such as assessments under the Mental Health Act 1983 are often challenging and need careful consideration. If concerns particularly relate to someone’s mental capacity to make a decision around their housing, then incorporating the concerns of housing workers may be vital. New tools and guidance have recently been published to support consideration of mental capacity, as well as mental health and safeguarding procedures for people who are homeless.⁸³
- 2.42** Geographical boundaries should not be a barrier to care. Nationally agreed and universally applicable standards of access for Inclusion Health patients should ensure treatment according to the needs and best interests of the person and prevent exclusion due to short-term address changes or street homelessness, lack of an officially recognised address (e.g. living on an unauthorised encampment) or lack of access to within-area culturally appropriate services. This will include willingness to maintain therapeutic relationships with homeless patients and other excluded groups who have temporarily moved out of the geographical boundaries of a service, including short stays in prison.
- 2.43** There should be enhanced and easy access to psychological (“talking”) therapies for individual and tailored group work.
- There should be access to treatment at Level 4 of the Stepped Care model,¹⁰⁰ recognising the high incidence of complex trauma among homeless patients.
 - For Gypsies and Travellers, there should be access to culturally appropriate talking therapies.
- 2.44** Support and training should be available for other health workers and for non-health key workers in understanding and working with people with mental health problems and histories of complex trauma, and in cultural awareness and community engagement training regarding the Gypsy and Traveller community.
- 2.45** Projects working with people with histories of complex trauma should be aware of and have regard to the Psychologically Informed Environments guidance.¹⁰¹

- 2.46** For homeless patients, there should be regular and structured meetings with hostel and outreach staff to discuss potential referrals and ongoing cases, improve conditions in chaotic hostels and encourage preventative work such as anti-bullying strategies, noise abatement and therapeutic groups.
- 2.47** Reflective practice is an essential part of effective working with people with complex trauma, and group and individual reflective practice should be developed by clinical, social care and multi-disciplinary teams.
- 2.48** The emerging issue of adults with attention deficit hyperactivity disorder (ADHD) may disproportionately affect homeless people, and these individuals need enhanced access to specialist care.
- 2.49** A history of acquired brain injury due to physical trauma and the effects of alcohol is increasingly recognised amongst homeless people and will require new referral routes for further assessment.
- 2.50** Antenatal and postnatal mental health: see NICE guidance applicable to all patients.¹⁰²
- 2.51** For certain excluded groups, for example vulnerable migrants, Gypsies and Travellers, presentation of mental ill-health may be culturally bound/specific.

Standards for inpatient psychiatric services

Many people from excluded groups will come into contact with mental health services only when they are acutely unwell. It is important that homeless people are not excluded from crisis pathways, with provision of respite beds for intermediate care, even if a discharge address, or responsible GP, cannot be identified at the moment of crisis.

- 2.52** Long-term medication. Some homeless people have long histories with mental health services and have been on medication for many years, with periods of “non-compliance”, psychotic episodes, and returns to the streets followed by returns to hospital via section. For people with an established psychosis who have been on medication, regardless of brief periods of non-compliance, it is dangerous to stop medication. However, medication should always be reviewed after transition between accommodations, including hospital discharge, and a recovery-oriented plan worked out with the client. Medication should be reviewed regularly and frequently.
- 2.53** Discharge planning should begin on admission and involve as wide a network of health and social care as required. As with physical health services, there should be intermediate care discharge accommodation available, so that those who no longer need psychiatric support can continue to recover within a therapeutic setting. These projects should take into account the Psychologically Informed Environments guidance.¹⁰² A Community Mental Health Team (CMHT) should be involved as soon as possible so that there is clinical and social care and support that bridges the transition from hospital to community. Discharge

to the streets should be avoided wherever possible. If it is being considered, careful consideration should be given to capacity, with particular reference to the specific risks involved in street homelessness.

- 2.54** Emerging evidence suggests that Pathway-style care coordination for homeless patients is equally effective in mental health settings, with improved outcomes and reduced costs.¹⁰³
- 2.55** Psychiatrists have a key role to play in outreach services to socially excluded communities who do not use mainstream services, for example on Travellers' sites or on the streets. This should not just be attendance at Mental Health Act assessments. Assessments should be longitudinal and built up over a period of time.
- 2.56** Psychiatrists have a role in creating a picture of mental health within excluded groups and individuals over a period of time, offering leadership to local mental health service staff, expert opinion to commissioners and Health and Wellbeing Boards, and data to JSNAs.

Standards for personality disorder services

Primary care, psychiatric, psychological and counselling services all need to take account of the particularly high incidence of personality disorder in the homeless population.

NIMHE guidance¹⁰⁴ offers specific standards for personality disorder services. Personality disorder services for homeless patients should include:

- 2.57** Local specialist multi-disciplinary teams offering specific interventions and consultation and supervision to other teams. Treatment at Level 4 of Stepped Care (NICE guidance),¹⁰⁰ which is recovery oriented and integrated with social care.
- 2.58** Specialist day services in areas of high prevalence of morbidity. Local services at all levels should be able to recognise people who present with significant personality difficulties, and offer them equitable, accessible and appropriate services.
- 2.59** Emerging evidence supports pre-treatment approaches to support patients with personality difficulties towards engagement, even if the clinical picture is complicated by addiction.¹⁰⁵
- 2.60** Local services should be accessible and responsive to people with personality disorder, offering a range of levels of support and intervention.

Standards for psychological services

Many of the problems experienced by Inclusion Health patients are amenable to psychological treatment. But for services to be accessible they need to be specifically designed and delivered.

- 2.61** Services should be flexible and open access by self-referral, and should avoid excluding potential service users on the basis of particular psychiatric diagnoses or even "clusters". Given the recognised high incidence of other pathologies, psychologists should offer cognitive assessment for organic damage and developmental difficulties where appropriate.

- 2.62** Provision should be made for specialist psychologists and psychotherapists to deliver psychological therapies directly and support all staff involved with those individuals through consultation and the provision of facilitated reflective practice.
- 2.63** Psychological therapies should include explicit phases of engagement and/or facilitate outreach workers to use psychological skills in engaging service users in the process of change, via the provision of training.
- 2.64** In order to increase use of such services, direct therapeutic input should be enabled in the environments in which homeless people are found, such as homeless healthcare teams, day services and hostels, rather than solely on an outpatient basis in psychiatric services; however, provision of therapy away from accommodation should also be available.
- 2.65** Psychological services should be carefully evaluated in terms of outcome. In order to address the paucity of evidence in the field, psychological services should adopt an 'evidence-generating practice' approach to interventions. All staff should be taught to monitor outcomes individually formulated with each service user, and to enable service users to perceive meaningful change as a result of their input. However, sometimes homeless people find paperwork a barrier to accessing services, so it is important that services have the flexibility to choose not to use outcome measurements if this not indicated.
- 2.66** The critical importance of the therapeutic relationship in psychological therapies, which is common to all psychotherapeutic models, should be explicitly recognised and supported in service design and delivery.
- 2.67** The forms of psychological intervention used should make use of existing and developing research on the processes underlying the causes and maintenance of homelessness in order to target interventions effectively.
- 2.68** A flexible approach to the implementation of psychological therapies should be developed in order not to exclude people on the basis of current alcohol and substance abuse, emotional liability or varying forms of self-harm.
- 2.69** Other services with which the service user is involved (e.g. social care, secondary care and third sector services) should continue to support the person who engages in psychological therapy. In this way, the therapeutic targets of the psychological intervention may be communicated to and reinforced and supported by a wider team of enabling staff.
- 2.70** Staff in primary and secondary care and third sector organisations should be enabled to understand the interaction between mental health issues and the behaviours leading to homelessness, using specific therapeutic frameworks, thereby increasing their understanding of the issues and increasing the range of responses available to them when dealing with challenging behaviours, in line with Psychologically Informed Environments guidance.¹⁰¹

Standards for counselling services

Counselling may be particularly beneficial for Inclusion Health patients, but a different approach is needed to both encourage and empower patients to move towards engagement with the process.

Services should:

- 2.71** Be flexible and open access by self-referral.
- 2.72** Offer flexibility of location of service provision.
- 2.73** Be culturally appropriate.
- 2.74** Recognise the need to create a culture of trust and for “opportunistic” outreach and “pre-engagement” work in the form of non-clinical but transitional activities (chatting, art groups, etc).¹⁰⁶
- 2.75** Recognise the need for flexibility in the face of lowered frustration tolerance thresholds and emotional outbursts, challenging/disengaging behaviour.
- 2.76** Be informed about trauma, addictions, personality disorder, pre-treatment therapy, and attachment theory and practice.^{107,108}
- 2.77** Incorporate a flexible counselling approach capable of offering an assessment of immediate, medium and longer-term needs, with a mix of crisis management, supportive counselling skills, problem clarification and problem-solving skills, taking into account the dynamics of the therapeutic relationship, in order to support people through the referral process to a more structured treatment.
- 2.78** Recognise people with personality disorder, engaging and supporting them through the referral process to more structured treatment.

Standards for substance misuse services

Since 2012 the lead responsibility for commissioning drug and alcohol services has rested with local authorities. Drug and alcohol services are increasingly being put out to tender at 2- to 7-year intervals. There is a danger that the drive to reduce costs results in less flexible services, with service users increasingly being asked to fit in with strict appointment schedules, and less access to consultant psychiatrists. Homeless people, for whom flexibility is especially important, may be disproportionately affected by these changes and less able to access services. Homeless people may also find a lack of continuity in services particularly difficult to navigate, partly because they may have more complex substance misuse problems, necessitating a longer treatment journey, and also because it may take longer to build up a trusting relationship between client and key worker. As a Faculty we would urge that consideration be given to longer commissioning cycles for substance misuse services.

- 2.79** Integrated drug and alcohol services should be easily accessible in places where homeless people go, such as drop-in centres and primary care centres. This should include easy routes into opiate substitution treatment, ideally provided on site. In areas with high levels of street homelessness consideration should be given to drug and alcohol workers carrying out street outreach.
- 2.80** People with drug and alcohol problems must be able to access active help with both problems from one key worker.
- 2.81** People dependent on drugs and alcohol should not be excluded from hostel accommodation because of their dependence.
- 2.82** Where there are high levels of intravenous drug use, hostel accommodation staff should be trained in the administration of Naloxone and it should be available on the premises according to Homeless Link guidance.¹⁰⁹ The project should have procedures covering the safe disposal of needles.
- 2.83** Naloxone should be prescribed for opiate users in primary care and on hospital discharge as a harm reduction measure.
- 2.84** Drug and alcohol workers should recognise the high levels of poor mental health among homeless substance users and there should be easy referral pathways between mental health and drug and alcohol services. Ideally, initial assessments of mental health problems should be provided within drug and alcohol services by staff with appropriate levels of training, to avoid inappropriate referrals, which can be costly and frustrating. Psychology services, both one to one and group, should ideally be available within substance misuse services. In areas with high levels of need, consideration should be given to integrated mental health and drug and alcohol services.
- 2.85** Many homeless people who use drugs or alcohol have co-existing physical health problems. In some cases, contact with substance misuse services may provide clients' only contact with healthcare professionals. Those professionals should therefore have sufficient expertise to make basic assessments of physical health problems and needs. Primary care-delivered services may improve coordinated delivery of healthcare and preventative services. Where there are separate services, communication with the GP service about current medication doses, vaccinations and screening is vital. Links between substance misuse services and secondary healthcare providers such as liver specialists, respiratory physicians and STI/family planning clinics should also be established.
- 2.86** Opportunistic provision of health promotion should be an integral part of substance misuse services. This should include screening for blood-borne viruses and vaccination against hepatitis A and B, particularly for injecting drug users and those with hepatitis C. An accelerated schedule should be used without delay for pre-testing.¹¹⁰ Substance misuse services should provide easy routes into treatment for those with hepatitis C.

Substance misuse services should be able to prescribe and administer intramuscular Pabrinex injections for clients who are at particular risk of Wernicke's encephalopathy, and thiamine should be prescribed for other alcohol-dependent clients.

- 2.87** Close links with services (ideally on the same site) providing benefits advice, housing support, and support into education, training and work are particularly important for homeless people in substance misuse treatment.
- 2.88** Medically assisted recovery with harm reduction and maintenance substitute opioid prescribing remains the safest option with the best evidence base for most homeless drug users with complex needs.³
- 2.89** Acute services should be actively supported to ensure timely provision of substitute prescribing for opiate-dependent patients admitted to hospital.
- 2.90** The role of pharmacists in supporting people who are substance dependent, and particularly those on substitute prescribing, should not be underestimated, and pharmacists should be involved in local multi-disciplinary teams.
- 2.91** Residential rehabilitation should be accessible to people who are homeless. This should involve flexible routes of entry into treatment, such as preparatory group work being offered in homeless hostels and day centres.
- 2.92** Drug and alcohol treatment should be available and accessible for vulnerable migrants, including those with no recourse to public funds.
- 2.93** Substance misuse services should above all be flexible and able to provide individualised care. Requirements for entry into treatment, particularly opiate substitution therapy, should be reviewed on an individual basis; for example, rigid requirements to provide multiple urine samples or attend pre-treatment groups may result in some clients being unable to access treatment. Clients with complex prescribing needs should be seen by clinicians with sufficient expertise and authority to be able to override treatment protocols when necessary.
- 2.94** Flexible entry requirements and prompt access are particularly important for clients directed into treatment by the criminal justice service.

Standards for police and criminal justice medical services

Responsibility for offender healthcare rests with NHSE (as the commissioner of offender healthcare services nationally), with providers of healthcare and with prison governors. Ensuring the delivery of high-quality healthcare in prisons is a contribution to reducing health inequalities specifically and also to improving the health of the whole community in general.

The Bradley Report (2009)¹¹¹ highlights the extent to which people with mental health disorders or learning disabilities are channelled into the criminal justice system. People who are homeless are often dealt with inappropriately – and at considerable expense – by law enforcement, with the additional problem that a number of low-level offences (vagrancy, public order, antisocial behaviour, begging) are available for officers to target this group. In some situations, desperate people commit minor offences to obtain shelter and food.

A complete narrative of any homeless person should take into account their relationship with the police and courts and consider ways in which their needs can be addressed constructively. Many police stations now have input from drug workers and mental health liaison nurses, but general medical input is often lacking.

Irish Travellers (mostly male) make up between 0.6% and 1% of the entire prison population in England and Wales, and are regularly subjected to racism and discrimination in the prison system.¹¹² Almost two-thirds of female Traveller prisoners suffer from mental illness, and 26.1% of all Irish Traveller prisoners have one or more mental illnesses (compared with 10% of the general prison population), with high rates of self-harm and depression.¹¹² Key factors that exacerbate the poor mental health of Travellers in prison include: lack of access to services, disruption of family and community support, and prejudice and loss of self-respect.¹¹²

Irish Travellers generally enter prison at a higher risk of ill-health than other prisoner groups, are accepting of ill-health, and access healthcare only infrequently outside prison; thus, any expression of ill-health by this prisoner group may indicate an urgent need. Many of the most serious difficulties facing this prisoner group are attributed (by prisoners themselves and prison staff) to their widespread inability to read and write, limiting access to health and other services in prison.¹¹²

“Rebalancing Act” is a useful report from Revolving Doors.¹¹³ It is intended to support a broad range of stakeholders at local, regional and national level to understand and meet the health and social care needs of people in contact with the criminal justice system, and through this engagement reduce offending and improve community safety. The report points out that it costs around £60,000 to send a person to prison, and £34,000 a year to keep them there. If the costs of care for children are included (mainly for women prisoners) then clearly hundreds of thousands of pounds a year are being spent to incarcerate people, many of whom need help.

2.95 Medical input to police stations should include mental health liaison, substance misuse workers and general medical care to treat wounds, treat medical conditions and screen for infectious diseases.

2.96 It is estimated that 15% of people are homeless when sentenced to a time in prison and 30% are homeless on release.¹¹⁴ It is important that health services for prisoners at risk of becoming homeless, and for formerly homeless prisoners, are connected to other health services involved in the patients'/prisoners' care.

Healthcare in prisons

The relationship between a clinician and patient in the prison setting is constrained by the environment and by contradictory expectations and requirements from the criminal justice system, the clinician and the patient. For example, there are challenges around potential diversion of medication, confidentiality and appropriate use of medical reports. The following approach for clinicians has been summarised by an experienced Faculty member. This is intended to serve as a reminder to the healthcare provider of the stance to take, rather than as a script to follow.

Approach

I'm here to help reduce the harm and risk of being in custody; to work with you to find a way to begin to tolerate living with yourself without so much medication/drugs; to normalise normal human experience and not over-medicalise or medicate; to take the opportunities to engage you in improving your health through health education, realistic goal setting, motivation and encouragement, investigation, diagnosis and treatment; to model a good clinician/patient relationship, provide compassionate boundaries, build trust and be trustworthy.

What works

- Team approaches and multi-disciplinary teams.
- Protocol-driven care – do not make exceptions.
- Reflect constantly with colleagues.
- Look after each other.
- Watch out for pedestals/favourites.
- Try not to get institutionalised.
- Spend time in other care settings.
- Know when to take a break.

There is a range of guidance available in relation to prison healthcare and prison dentistry.^{115,116,117} Many of the standards set out elsewhere in this document will also apply to prison medical services.

In addition, they should include:

2.97 Full registration of patients treated, including documentation of ethnicity. See 2.18 – ensure the Department of Health-issued national “data change notice” to include Gypsies, Roma and Travellers alongside the 16+1 other ethnic categories that are monitored by the NHS is also applied to the prison medical care system.

2.98 Use of a standard primary care record system incorporating past medical records and passing on the full record to the NHS primary care record system on release.

2.99 Active liaison with medical services outside prison on release and proactive commitment to ensuring smooth transition of care.

2.100 Ensure the needs of Gypsy and Traveller prisoners are addressed:

- There should be awareness among healthcare teams that Gypsies and Travellers experience high levels of mental illness and suicide.
- Ensure literacy problems do not impact negatively on negotiating the bureaucracy involved in accessing health and other services.
- Ensure literacy and nomadism do not impact on maintaining links with families, for example, writing applications for Visiting Orders, ensuring families can receive these if they live on an unauthorised site or possess no officially recognised address.

Standards for immigration removal centre medical services

There are similarities between IRCs and prison with regard to care. NHSE is also responsible, and the client group may overlap through those who are transferred from prison. However, there are challenging differences. IRCs are more directly harmful to mental health due to the unpredictable and unstable nature of immigration detention and the “culture of disbelief”, particularly involving highly vulnerable detainees/survivors of trafficking/torture.

2.101 Highly vulnerable or unwell detainees should not be in IRCs (Home Office guidance).

2.102 Healthcare workers have a central role in identifying highly vulnerable or unwell detainees and need to be skilled and supported to do this.

2.103 Independent clinicians (e.g. Medical Justice) should be available to assess detainees at risk of inadequate care in detention.

2.104 Continuity of physical healthcare is vital: for example, secondary care appointments should not be missed and medication should not be interrupted due to detention.

2.105 The impact of detention on mental health should be regularly re-assessed and treated (see Health of vulnerable migrants, p14).

Standards for dentistry services

Access to dental care for homeless people is worse than access to general medical services. Homeless people have similar levels of dental disease to the housed population, but higher levels of untreated dental disease, which has considerable impact on their quality of life and depressive states.^{118,119} Most homeless people wish to have their dental needs addressed but face barriers to accessing dental care, which include: dental anxiety and fear,²⁸ confusion about where and how to register with a dentist, confusion about entitlement to free or subsidised dental care, the requirement to meet other more pressing survival and welfare needs, and fear of rejection or refusal of care from a dental practice.^{120,121} Most dental treatment needs of homeless people are not complex and

may be readily treated in a primary dental care setting; however, current arrangements within NHS dentistry do not facilitate the flexibility required in managing the provision of dental care for homeless people.^{28,122,123} There is a growing movement to promote socially inclusive dentistry within the NHS.¹²⁴

Oral health promotion

- 2.106** Health promotion with excluded groups should have an integrated oral health element and use a common risk factor approach addressing nutrition and diet, smoking, alcohol and substance use, and basic hygiene.¹²⁵
- 2.107** Dental health education/oral health promotion provided should be sensitive and appropriate to the person's oral risk factors, housing situation and literacy level (using visual aids where necessary, e.g. story sacks, puppets and games for children, or models, pictures, and flipcharts for adults); it should also be culturally appropriate.
- 2.108** Where possible, the skills of all members of the dental team – dental hygienists, therapists and nurses, as well as dentists – should be used in the oral health promotion process.
- 2.109** All members of excluded groups attending for dental care should receive an oral health assessment and timely provision of treatment. Evidence suggests that treatment plans based over short time frames are more likely to be completed.

Commissioning socially inclusive dentistry

- 2.110** Commissioners for healthcare for excluded groups should identify the local consultant in dental public health. They should champion access to dental care and work collaboratively with heads of community and special care dentistry services to advise on how access could be facilitated within local arrangements for NHS dentistry (appropriate local NHS primary dental care and/or salaried dental/special care dental services).
- 2.111** Dental care for excluded groups should be included in an area's oral health strategy. Services for excluded groups should be specified in contractual arrangements with appropriate local NHS primary dental care and/or salaried dental/special care dental services. The strategy should include raising awareness of the dental needs of excluded groups to those outside the dental profession, including local public health teams, health professionals, community workers, education services, and the service users themselves.
- 2.112** Each local authority should undertake an oral health needs assessment of the socially excluded populations in their locality to understand both normative and subjective dental impacts in these groups. A mapping of existing services within and outside the NHS is needed in order to understand the current capacity to manage the burden of dental disease in socially excluded populations.
- 2.113** Services should be commissioned to mapped oral health needs and should provide services that are appropriate to the service users and can adapt to their needs as these are revealed.¹²⁵ These may include, but are not limited to, outreach services situated at locations convenient for the users, flexible opening hours (early mornings or later into the evening) and collaboration with pre-existing services.

- 2.114** Each service is recommended to have a policy as to what treatment will or will not be provided to those service users who are uncertain of their exemption status, especially those who present with a dental emergency such as pain or facial swelling.
- 2.115** There is a multiplicity of services across the country that are using a range of different models to deliver care. Inter-service communication and an agreement of what constitutes best practice for delivering socially inclusive dentistry should be implemented. A central hub assimilating data and providing an overview of the oral health needs and services available to meet these needs should be produced. The ultimate aim is to target those areas with the greatest need for dental care and the fewest available resources to meet that need. In this way, funding and service development can be provided equitably.
- 2.116** The standards and quality of dental care provided in mobile and outreach clinics should seek to comply with Care Quality Commission best practice recommendations.

Integration of dental care with primary medical and social care

- 2.117** All socially excluded people attending for a health needs assessment with a member of the primary health and social care team should be asked about their dental health and be referred for a dental needs assessment as part of a single assessment process. The latter is particularly important for children in homeless families.
- 2.118** All members of a primary health and social care team including key liaison workers (e.g. peer workers, Specialist Health Visitor for Travellers) in contact with excluded groups should receive basic training on assessing dental health and prevention of oral disease.
- 2.119** A common risk factor approach targeted at those factors which impact upon both general and oral health is recommended, to “put the mouth back into the body” and to keep health promotional messages consistent with medical colleagues. Risk factors include: nutrition and diet, smoking, alcohol and substance misuse, and basic hygiene.
- 2.120** The dental setting also provides an opportunity to screen for other conditions, for example hypertension or diabetes. If these tests are undertaken there should be clear pathways to link patients to services that can manage these medical conditions. It should be noted that trained dental nurses already undertake these tests for dental care, so the use of appropriately trained dental nurses to carry out these tests in the setting of outreach projects to socially excluded people would be an extension of their roles.
- 2.121** A cohesive approach between medical and dental care may include the collaboration of key services delivered alongside one another, for example, TB screening, podiatry, dental, smoking cessation. This approach will enable multiple services to be accessed simultaneously rather than multiple appointments at different sites, which may be problematic for those with chaotic lives.
- 2.122** Dental services providing care for excluded groups would benefit from being integrated with, and complementary to, other health and social services and agencies¹²⁶ providing services to those groups.

Delivering socially inclusive local NHS dental services

- 2.123** Local NHS dental services within an area should share experience, network and facilitate referrals as well as collaborating with medical and social services: “putting the mouth back into the body”. This may be particularly important for primary dental care services that have limited knowledge of the specific needs of excluded groups. For services working with specific groups (e.g. Gypsies and Travellers, but not limited to this group), cultural awareness sessions for all members of the dental team may be necessary.
- 2.124** Flexible and iterative solutions should be sought when developing socially inclusive dental services. Services should have appropriate opening hours for the population that they are seeking to serve, be commissioned in areas of high need, and be welcoming to the service users.
- 2.125** Different modes of delivery will be required to address different categories of need in different localities, and should include a mix of “safety-net” services delivered at fixed sites, for example based at facilities for homeless people and outreach clinics (to include mobile dental clinics) and mainstreaming to local NHS primary dental care.
- 2.126** Peer support workers can be helpful in supporting people to make and keep dental appointments. Where possible this service should be developed.
- 2.127** Services should be non-judgemental and non-threatening, providing reassurance particularly for people who are anxious about dental treatment.
- 2.128** Mainstream services must not deliberately prevent access by excluded groups; this should be regularly tested and refusal of access robustly contested.
- 2.129** With all excluded groups, the specific issue of dentures taking more than two appointments to complete should be considered. There is anecdotal evidence that socially excluded and vulnerable groups often do not complete the series of appointments required for the construction of dentures. This can lead to a waste of NHS resources in that clinicians’ time is used and laboratory fees are incurred to no benefit to the patient or the NHS. Commissioners need to consider what their stance on this issue is, and communicate this clearly to service providers.

Standards for physiotherapy services

A national audit of people who are homeless revealed that 70% reported health problems involving chest pain, breathing problems or joint/muscle problems.¹²⁷

Commissioners of healthcare for homeless people should consider how to improve access to physiotherapy for this population. Physiotherapy may be important in the management of the physical health component of tri-morbidity, including musculoskeletal injury management, amputee care, cardiac and pulmonary rehabilitation, and neurological rehabilitation.

- 2.130** Where need is identified, recruitment of a specialist physiotherapist for homeless and vulnerable people should be considered.
- 2.131** In multi-disciplinary teams where a specialist physiotherapist for homeless and vulnerable people does not exist, a member of the physiotherapy team should be identified as a “champion” for liaison and advocacy for homeless and vulnerable people.
- 2.132** The training needs of specialist physiotherapists for homeless and vulnerable people should be considered. For example: conflict resolution, working with interpreters, the long- and short-term effects of illegal drugs and alcohol, mental health, domestic and sexual violence, child protection, the criminal justice system, immigration, torture.
- 2.133** To raise awareness of the potential for specialist physiotherapy services for homeless and vulnerable people within the profession of physiotherapy, various strategies should be considered, including: rotation of mainstream junior physiotherapists through the service, practice placements for physiotherapy students, liaison with university colleagues regarding the inclusion of issues surrounding homelessness and vulnerability in undergraduate curricula, publications and conference presentations.

Standards for podiatry services

Footcare is particularly vital for homeless people. Where numbers of homeless people justify drop-in centres and other specific provision, a specialist podiatry service is very likely to be necessary. In other areas enhanced access should be planned.

- 2.134** “Drop-in” access should be by self-referral with continuity of provision to build trust – including cover for leave. Appropriate and accessible advertising of services should include easy-to-read materials, translated materials, and clinical access to interpreters and Language Line.
- 2.135** Podiatry should be available at all drop-ins and GP surgeries providing services for homeless people in the area. New patients should be referred to the GP or nurse for full health assessment.
- 2.136** Security should be considered, including the set-up and location of clinical rooms, access to notes and alerts, and chaperones when necessary.
- 2.137** Despite working in non-NHS settings, services should apply the same standards of infection control, note taking, equipment maintenance, sample collection, etc. as apply in mainstream services.
- 2.138** Lead clinicians should work in both mainstream and specialist settings, to maintain links and equitable standards. Services should ensure equal access to other specialties to which podiatrists will frequently refer via GPs, such as physiotherapy and surgical footwear; arrange support to attend where necessary; and promote annual diabetic neurovascular foot checks and diabetic foot care advice on an opportunistic basis by all health team members, as well as screening for alcohol-related neuropathy.

- 2.139** Signposting to other services, as podiatrists are in a position to build up trust rapidly due to instant relief of pain by non-painful treatment, repeat consultations and the opportunity for talking during treatment. Provide foot health and podiatry awareness training for day centre volunteers. Engage in frequent care plan reviews according to the patient's changing situation. Provide assertive outreach for non-engaged clients, with advice about drop-in podiatry clinics. Encourage the provision of free shoes and socks in day centres. Provide supporting letters for grants/loans for shoes from the Department of Health and Social Care if necessary. Ensure service users are involved in service design and assess their experience through, for example, patient satisfaction surveys.
- 2.140** For recently housed patients services should ensure continuing care or refer on.
- 2.141** Modify treatment if necessary, for example, the use of strong acids to treat verrucae needs care as the patient cannot rest. Podiatrists should liaise with day centre staff with regard to possible temporary accommodation provision when a patient is particularly vulnerable due to a foot problem.
- 2.142** Training and education: Consider the training needs for podiatrists providing care to homeless people in conflict resolution, working with interpreters, effects of drugs and alcohol on the lower limb, mental health, torture. Build links with other local agencies and services. Offer training to the profession through: mandatory rotation of mainstream podiatrists, placements for podiatry students, university guest lecturing and workshops on homeless healthcare for podiatry students, publications and conference presentations, audit and research.
- 2.143** All podiatry teams should have a "Specialist Podiatrist for Homeless and Vulnerable People", with equal grading of these posts to other specialist podiatrists in the team. Podiatrists should have independent prescribing rights where appropriate.

Standards for eye care

Homeless people have more eye problems than the general population. This includes a high prevalence of uncorrected refractive error, cataract, glaucoma and binocular vision problems. There is a higher risk of macular degeneration as smoking rates are three times greater in the homeless population. One-third of homeless people have never had their eyes tested, and a further third not in the last 10 years.¹²⁸ Yet, homeless people with refractive error need spectacles in order to find accommodation, obtain or retain employment, to help them stay safe and to enjoy everyday activities. Access to eye care services would enable the correction of refractive error, detect avoidable sight loss and help people to maintain their ocular health. Eye examination can also detect general health conditions such as diabetes or hypertension, which if left untreated and uncontrolled can lead to sight loss.

NHS-funded eye care services (the sight test and vouchers towards the costs of spectacles) are available for some people.¹²⁹ These services are normally provided in high street optical practices that hold a mandatory services General Ophthalmic Services (GOS) contract. However, homeless people are not receiving the eye care services they need. Eligibility for free eye care depends on receiving certain benefits or holding a current HC2 certificate. In any one year 31% of homeless people have had their benefits stopped,¹³⁰ during which time they are ineligible. The charity Vision Care for Homeless People¹³¹ has found that 62% of homeless people are ineligible for NHS funding at the point of service, and even when they are eligible, many find it difficult to access the services to which they are entitled. For example, GOS forms (which are required to claim the NHS fee or voucher) require an address for the patient and will not allow “no fixed abode” to be entered on to the form. Even with a voucher, some optical practices cannot provide spectacles within the voucher value, and even a small charge may be unmanageable. People are also eligible for only one spectacles voucher every 2 years. Homeless people are more likely to have their property stolen or be assaulted, and therefore spectacles might be lost or broken beyond repair sooner than the 2-year interval. Although there is provision for the cost of repairs or replacements, homeless people will rarely be able to meet the criteria.

Even when a homeless person could be entitled to the service, accessing it can be difficult. Sight testing a homeless person may require a longer appointment time than usual. Moreover, homeless and other excluded people can find high street optical practices difficult to access; they are fearful of an eye test and the associated procedures, and are worried they will be charged for the service.

A specific walk-in service for homeless people may be the only way to engage patients. The GOS contract does make provision for services to be provided other than on the high street when a patient is unable to attend a high street practice due to illness or disability. However, these regulations do not currently enable services to be provided to homeless people in hostels or day centres and the regulations would be hard to apply to a homeless shelter, since a contractor is required to give the NHS 3 weeks prior notification of the patients they intend to see. Put together, these barriers are a major disincentive to regular opticians providing a service for homeless people, as it is not commercially viable. These health inequalities have been widely recognised, including by the Clinical Council for Eye Health Commissioning and the Optical Confederation.¹³²

Improving access to eye care for homeless people and other excluded groups can be achieved through a combination of improving current processes and making more effective use of the mandatory (static clinic) and additional services (mobile clinic) GOS contracts.

- 2.144** Primary care health assessments should include asking about vision problems and signposting for those who have not had a routine eye examination in the past 2 years.
- 2.145** Effective eye care services should include delivering eye examinations, the provision of appropriate eyewear, timely referral of those in need of secondary care and signposting to primary care.
- 2.146** “No fixed abode” must be accepted on GOS forms, facilitating access to mainstream services for homeless people who are already eligible.

- 2.147** GOS regulations should be amended to allow for repairs or replacement spectacles for homeless and vulnerable people, similar to the provision for children, where the loss or breakage is sustained “as a consequence of their vulnerability”.
- 2.148** Local commissioners should offer contracts to GOS contract-holding opticians to deliver eye-care services to homeless and other excluded people who are not entitled to NHS-funded services. Clinics would be held in their practices (possibly at fixed times), with fees the equivalent of the GOS test fee and spectacles vouchers. This approach has been recommended by the London Assembly Health Committee.¹³³
- 2.149** Services should be made available to homeless people at day centres, specialised GP centres and hostels. This could be achieved either by amending the GOS regulations for additional services contracts (including removing the current requirement for 3 weeks prior notification of the patients to be seen, and the requirement that they are unable to attend a high street practice unaccompanied) or by locally commissioning such services directly. Domiciliary Enhanced Services of this nature have been commissioned in Cheshire, the Wirral and Merseyside¹²⁸ and Wessex.¹³⁴
- 2.150** Services specifically commissioned for excluded groups should be characterized by flexibility, with drop-in appointments and accessible locations. The environment should be friendly, and patients should feel safe, welcome and comfortable.

To contribute to lobbying to achieve these aims, consider joining the Homeless Eye Health Alliance.¹³⁵

Standards for palliative care

Homeless people often die young, their deaths being unplanned for and unsupported.

Recent research suggests palliative care services are currently rarely involved in supporting this population, except for some patients with cancer. The following challenges to palliative care delivery for this group have been identified:¹³⁶

- Uncertainty around the prognoses of common illnesses, e.g. advanced liver disease.
- Difficulty accessing mainstream services due to behaviours associated with mental health issues and poorly managed addictions. These could include conflicting priorities, avoidance of healthcare settings, self-discharging and behaviour that results in exclusion from services.
- Lack of appropriate services and places of care, particularly for those with complex health needs in combination with substance misuse issues.
- The burden of supporting sick and dying people who are living in hostels is often left to hostel staff, who have no medical training and often minimal support from health and social services.

2.151 The importance of working with uncertainty

Accepting and working with uncertainty is key in providing person-centred care. Identifying homeless people who may be dying is complicated, so the focus of care and support should instead be triggered by those people whose “health is a concern” or those who have deteriorating or advanced ill-health.

2.152 The need for a multi-disciplinary team approach in order to offer the most appropriate care and support individual care planning is essential (see also point 2.158).

2.153 Regular multi-disciplinary meetings should take place with input from medical teams, including GPs, specialist nurses, drug and alcohol teams, palliative care professionals, and hostel and/or outreach and day centre staff. In these meetings, any homeless person with deteriorating or advanced ill-health, or who is a concern to frontline staff, should be discussed. Someone should not need to be considered palliative to trigger the discussion.

2.154 Information exchange between medical teams and frontline staff should be encouraged. Hostel and/or outreach and day centre staff should be included/involved in communication with hospitals regarding the care of people they are supporting, including invitations to hospital discharge planning meetings.

2.155 The need for person-centred care

Homeless people should be involved in discussions and decisions about their treatment and care, striking the right balance between continuing to offer and provide support while respecting individual choices (even when these choices include what healthcare and frontline workers may consider unwise, for example regarding continued substance use).

The emphasis should be on what “living well” means to an individual

2.156 Conversations with people with deteriorating or advanced ill-health who continue to use drugs or alcohol should aim to explore their insights and wishes rather than be “warning” conversations such as “If you don’t stop drinking you will be dead within 3 months”.

2.157 Parallel planning should be considered for all homeless people with deteriorating or advanced ill-health: i.e. planning for the end of life does not preclude continued active management.

2.158 All people with deteriorating or advanced ill-health should have a personalised and emergency care plan to help hostel, outreach and day centre staff to support them. Care plans could be developed within multi-disciplinary meetings. Support from the multi-disciplinary meetings could also include how to talk to people about their insights into their health, what might help them to live well, and what their wishes and preferences for care may be.

2.159 Extending in-reach into hostels and day centres

In-reach from a range of professionals is valuable and should be considered and extended. This could be provided by local hospice staff, drug and alcohol teams, specialist nurses and GPs, etc.

- 2.160** In-reach into hostels or day centres could support staff in identifying and supporting people whose health may be deteriorating or is of concern.
- 2.161** In-reach could assist in the acquisition of funding for social care and continuing healthcare needs for people living in hostels.
- 2.162** All professional groups should receive training (which is appropriate to their role) regarding support for service users with advanced ill-health, in addition to bereavement support.
- 2.163** One model for effective palliative care in-reach is the Palliative Care Coordinator role developed by St Mungo's. Ways of extending or replicating this role need to be considered and explored.¹³⁷

End-of-life care for excluded groups needs particular sensitivity to ensure that people are supported to make their own choices. Guidance is provided by St Mungo's and Marie Curie.¹³⁸

For Gypsies and Travellers, lack of facilities for terminal care on Gypsy/Traveller sites means that death may occur in hospital rather than (as may be preferred) amongst family at home.¹³⁹ Services should recognise the importance of family support and kin-group responsibilities, manage expectations, and avoid conflict over numbers of visitors or caravans/vehicles if people are gathering to support a person having medical treatment or following bereavement.⁴²

Standards for medical respite care

Homeless services may include the provision of “respite care” (now in place in 50 cities in the USA and Canada) – community-based residential medical facilities for homeless people with significant and complex healthcare problems. These services improve outcomes and reduce subsequent unscheduled hospital admissions.^{79,80} Recent reviews of medical respite services currently available in the UK,^{81,140} made the following recommendations:

- 2.164** A detailed analysis of local need should be undertaken to define the nature of the service required.
- 2.165** Projects usually need integrated planning with the local authority; however, any model requiring an assessed local connection (as set out in the Housing Act 1996) will limit the potential for usage of beds.
- 2.166** Projects should aim to provide holistic person-centred care management covering physical health, mental health and drug or alcohol misuse needs as required.
- 2.167** Projects should ideally have on-site access to a range of primary care services. Close links to GP practices that provide healthcare to homeless people will be beneficial.
- 2.168** Projects should ideally be dry, or aim to minimise alcohol and drug misuse on site.

- 2.169** Projects should ideally be able to provide for patients with physical disabilities and substitute prescribing needs.
- 2.170** Projects should be able to actively provide or promote access to meaningful activity, such as education, training, sports, arts activities.
- 2.171** Full consideration of potential move-on options, particularly for clients with complex needs or no recourse to public funds, should be given when designing medical respite services.
- 2.172** Pilot projects should be given adequate time (2-3 years minimum) to embed before being evaluated for outcomes and cost benefit.
- 2.173** Projects should ideally be Psychologically Informed Environments,¹⁰¹ with regular reflective practice.

Although not explicit in the recommendations, successful projects will require the support of non-medical staff with expertise in welfare, housing (including culturally specific needs) and getting clients back into meaningful activity, including volunteering and paid work.

Homelessness is a health problem as well as a social one. Health and social care should be integrated in recovery pathways for homeless people; to achieve this it is crucial that health professionals work closely alongside other services in the interests of their patients, integrating care packages and advocating for the best possible outcomes for patients.

Standards for secondary care services

The Homelessness Reduction Act 2017 came into effect in April 2018. The Act places duties on local housing authorities (LHAs) to intervene at earlier stages to prevent homelessness in their areas, and requires LHAs to provide new homelessness services to all those affected, not just those protected under existing legislation.

The Act places a new “duty to refer” on Public Authorities to notify (if the person consents) an LHA of any person who they consider may be homeless or at risk of homelessness in the next 56 days. This presents a significant opportunity to radically improve collaboration between hospitals and the LHAs in their area.

Healthwatch England has highlighted the plight of many people being discharged to the streets.¹⁴¹ No homeless patient should be discharged unsupported. To achieve this, all admitted patients should be asked “Do you have somewhere safe to stay when you leave hospital?”, and staff should be trained and supported to help people who say “No”.

For hospitals with significant numbers of Inclusion Health patients, the Pathway care coordination approach has demonstrated improved patient care and cost efficiency.^{142,143,144} GP- and nurse-led ward rounds, multi-agency care planning meetings and involvement of Care Navigators are the key elements. Pathway teams have been commended by the Royal College of Physicians’ Future Hospitals Commission Report.¹⁴⁵

2.174 All hospitals should have protocols for discharge planning for excluded groups, based on the guidance developed by St Mungo's and Homeless Link.¹⁴⁶ An evaluation of hospital discharge projects for homeless people found better outcomes for integrated teams involving housing workers and health workers (essentially the Pathway approach) than for housing workers alone.¹⁴⁷ The Royal College of Physicians, working with the Faculty, recommends the following tiered approach to support in a hospital setting.¹⁴⁸

All patients presenting to A&E should be questioned about housing status and all rough sleepers identified immediately on arrival to any department at the hospital. All hospitals should have a system in place to support homeless people prior to discharge.

- **Tier 1.** Hospitals with fewer than 30 homeless patients presenting each year:
An identified member of staff who oversees the development of a referral protocol to LHA's in their area and ensures that all staff are aware of their duty to refer under the Homelessness Reduction Act. Maintains an information pack with signposting to local volunteer agencies for homeless people, hostels, foodbank, free meals, etc. A small supply of clean clothing.
- **Tier 2.** Hospitals with 30-200 homeless patients presenting each year:
A dedicated housing officer with strong relationships with the LHAs, hostels, charities, etc. A named link hospital coordinator to maintain the referral protocol to the LHA and support the housing officer in obtaining necessary medical assessments (with the person's consent). An information pack for homeless people. A supply of clean clothing. Training and education of all hospital staff by the housing officer and named hospital coordinator.
- **Tier 3.** Hospitals with more than 200 homeless patients presenting each year:
Full, clinically led, Pathway team. See the Pathway website for details.¹⁴⁹

The Homelessness Reduction Act 2017 sets out that the basic legal requirement for a referral to the LHA is the individual's name, contact details, consent and the agreed reason for referral (i.e. that the individual is homeless or at risk of homelessness). It is likely that LHAs will develop standard referral forms in partnership with referring authorities.

Appendix 1 details a draft, more thorough, best practice referral form. It has been developed by the Faculty for Homeless and Inclusion Health in collaboration with Crisis. An electronic version can be downloaded from the Faculty website.

Appendix 1. Homelessness Reduction Act 2017 referral form

English Public Authorities are required to notify people who they think are homeless, or may be at risk of homelessness in the next 56 days, to a local housing authority (LHA). Follow your local protocol for referral, but consent must be obtained and the person is entitled to choose which LHA is notified.

Consent to release information: (to be signed by the person referred)

I agree for information on this form to be released to my local housing authority for the purpose of obtaining advice regarding my housing need.

Signed: _____ Date: _____

Referrer details

Patient location (e.g. ward):	
Name and contact details of referrer:	

Details of person referred

Family name:	Title:
Forename:	Preferred name:
DOB:	Gender:
Nationality:	Preferred language:
	Is an interpreter required?

Accommodation

Current address: (if applicable)	Home Tel: Mobile: Email:
Postcode:	Borough:
Has the person lived at this address for more than 6 months? If NO, please give all addresses in the last 5 years	
Current accommodation type: (tick most appropriate)	
<input type="checkbox"/> Owner occupier	<input type="checkbox"/> Private rented
<input type="checkbox"/> Living with parents	<input type="checkbox"/> Staying with friends/family
<input type="checkbox"/> Hostel	<input type="checkbox"/> Night shelter
<input type="checkbox"/> Housing Association (please give name):	<input type="checkbox"/> Council tenant
	<input type="checkbox"/> Sleeping rough
	<input type="checkbox"/> Other (please specify)

Employment status and benefits

Is the patient in employment? Please give details:

Is the patient in receipt of any benefits?

Which benefits does the patient get? Please specify including any DLA payments:

Does the person have any links to the LHA you are notifying?

Tick all relevant boxes

Currently resident

Previously resident

Parent or sibling in area

Other family association (describe):

Employed in the area

Care leaver in the area

Rough sleeping in the area (please give location):

Other (please explain):

Medical information

Please list all medical diagnoses, social difficulties and mobility problems, and whether they are likely to be long or short term. Please include any mental health and substance misuse issues.

What date is the patient due to be discharged?

Aids and adaptations/facilities

Is the Hospital OT involved? (please circle) Yes or No

Name and contact details of OT:

OT assessment recommended: Stair lift Hoist Through floor lift Wetroom

Hand rails/grab rails Ramp Remote opening

On return to home without appropriate facilities, will there be serious risk to health of or accident to the person or the carer? (give details):

Without necessary or appropriate facilities will the needs of this person be affected long term?

Yes No

Will the patient's long-term ability to stay at home be consequently compromised without aids/adaptations/facilities?

Unlikely Possible Likely Probable Definite

Reason why the client cannot return to current or last accommodation

For example, current accommodation is unsuitable/patient is homeless upon discharge, please explain:

**This form can be downloaded in an editable format from the Faculty website:
www.pathway.org.uk/standards**

Glossary

A

- ADHD** Attention deficit hyperactivity disorder
A&E Accident and Emergency
ASCOF Adult Social Care Outcomes Framework

C

- CCG** Clinical Commissioning Group
CHAIN Combined Homeless Information Network
CMHT Community Mental Health Team

G

- GOS** General Ophthalmic Services

I

- IAPT** Improving Access to Psychological Therapies
IRC Immigration Removal Centre
ITMB Irish Traveller Movement in Britain (now known as Traveller Movement)

J

- JSNA** Joint Strategic Needs Assessment

K

- KPI** Key Performance Indicator

L

- LHA** Local Housing Authority

N

- NHSE** NHS England
NICE National Institute for Health and Care Excellence
NIMHE National Institute for Mental Health in England
NOCN National Open College Network

O

- ONS** Office for National Statistics

P

- PHE** Public Health England
PHOF Public Health Outcomes Framework
PR Practice Record

Q

- QOF** Quality and Outcomes Framework

R

- RSPH** Royal Society of Public Health

S

- STI** Sexually transmitted infection

T

- TB** Tuberculosis

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For ease of use all links have been shortened.

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