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Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014: Final Report

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Post-implementation evaluation of Part 2 of the Housing Act
(Wales) 2014:
Final Report

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Views expressed in this report are those of the researcher and not
necessarily those of the Welsh Government

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Glossary

Acronym/Key word	Definition
DLA	Disability Living Allowance
ESA	Employment and Support Allowance
JSA	Job Seeker's Allowance
LHA	Local Housing Allowance
PIP	Personal Independence Payment
PHP	Personal Housing Plan
PRS	Private Rented Sector
RSL	Registered Social Landlord
SP	Supporting People
TA	Temporary Accommodation
UC	Universal Credit

1. Introduction: the aim of the Evaluation

- 1.1 The Housing Act (Wales) 2014 introduced major changes to the way homelessness is being addressed (from April 2015), with the core changes in Part 2 of the Act¹ aimed at extending services preventing homelessness and providing assistance to all eligible applicants. A longitudinal post-implementation evaluation of this part of the Act, which focuses on both process and impact, is now complete.
- 1.2 The overall aim of the evaluation is to understand how the Act has been implemented by organisations involved in supporting people at risk of homelessness (local authorities, housing associations and third sector organisations). The research will inform the Welsh Government's understanding of the impact of the Act on people who are homeless/at risk of homelessness.
- 1.3 The specific evaluation objectives are as follows:
- To evaluate the implementation of the legislation by local authorities.
 - To evaluate the short and longer term impacts of the new legislation.
 - To identify the need for further improvements, developments and support to ensure consistently good services are delivered across Wales.
 - To assess the impact of the legislation on service users, local authorities and key partners.
 - To evaluate the impacts on homelessness of the much greater emphasis on prevention that is a core feature of the Housing (Wales) Act 2014.
- 1.4 The evaluation comprised two waves of fieldwork, this final report presents the findings from the second wave of fieldwork and reviews relevant findings from the interim report.
- 1.5 The final report is structured as follows: Introduction and Background to the Act; Methodological Approach to the Evaluation; Secondary Analysis of Homelessness Statistics; The Impacts and Processes of the Act; Implementation and Administration; Partnership Working, Person-centred Practice; Vulnerable Groups; the Private Rented Sector; Structural Challenges; and Conclusions and Recommendations.

¹ Throughout the report this is referred to as the Act.

Introduction and Background to the Act

- 1.6 Homelessness is a complex issue with multiple structural and individual causes. The causes of homelessness are well-documented, although it is difficult to properly quantify since definitions are not consistent, difficult to monitor (see Fitzpatrick, Kemp & Klinker, 2000) and include: poverty and unemployment; a shortage of affordable housing; the effects of recession; reductions in housing and other benefits; mental health issues; relationship breakdown; alcohol and substance misuse; time served in prison; and traumatic life events
- 1.7 Until the introduction of the Housing Act (Wales) 2014, homelessness legislation in Wales was based on the UK 1977 Housing (Homeless Person's) Act which was subsequently amended by the Housing Act 1996 and the Homeless Persons (Priority Need) (Wales) Order 2001. This legislation accepted a statutory duty to rehouse priority need and unintentionally homeless households. This provision was selective, in that those who fell outside of the priority need, unintentionally (and local connection) categories did not historically receive a duty for rehousing.
- 1.8 Devolution in 1998-99 presented an opportunity for Welsh Government to introduce constitutional changes to housing and homelessness policy² (Mackie, 2014), and Welsh homelessness reforms are seen as one of the best examples to date of the Welsh Government using its powers (Public Policy Institute or Wales, 2017). Leading up to the legislation, Welsh Government commissioned over 15 reports related to homelessness which focused on: homelessness prevention; housing solutions for specific groups; the effectiveness of Welsh Government programmes; improving the health of homeless people; and learning from the experiences of the previous legislation (Public Policy Institute for Wales, 2015) In 2009, Welsh Government published the Ten Year Homelessness Plan, which pledged: 'In ten years we want to see homelessness reduced to a minimum (Welsh Government, 2009: 1).

² Primary law making powers were passed to the WG following the referendum in 2011.

1.9 The Housing Act (Wales) 2014 – implemented in April 2015 - introduced a number of changes in the way that homelessness is addressed in Wales. The main changes include:

- The introduction of new duties for local authorities to help prevent homelessness for anyone who asks for help³ and the duty that authorities carry out ‘reasonable steps’ to prevent or relieve homelessness.
- More flexible interventions by local authorities to ensure more effective prevention of homelessness.
- A change in organisational culture to underpin a person-centred/partnership approach between local authorities and people who come forward for assistance⁴.
- Increasing the length of time when people are considered to be threatened with homelessness from 28 days to 56 days and extending the prevention duty to all, not just those in priority need.
- Changes in the application of priority need, intentionality and local connection provisions.
- Creating a new framework to involve housing associations.
- Creating a new framework to work with the private rented sector in alleviating homelessness.

1.10 The Act aims to ensure that:

- help is available for everyone who is at risk of homelessness or is homeless;
- early interventions take place to prevent crises;
- there is less emphasis on priority need;
- the best use is made of resources, including private rented accommodation;
- local authorities work with people to help them find the best housing solution; and,
- there is partnership working across organisations to achieve sustainable solutions.

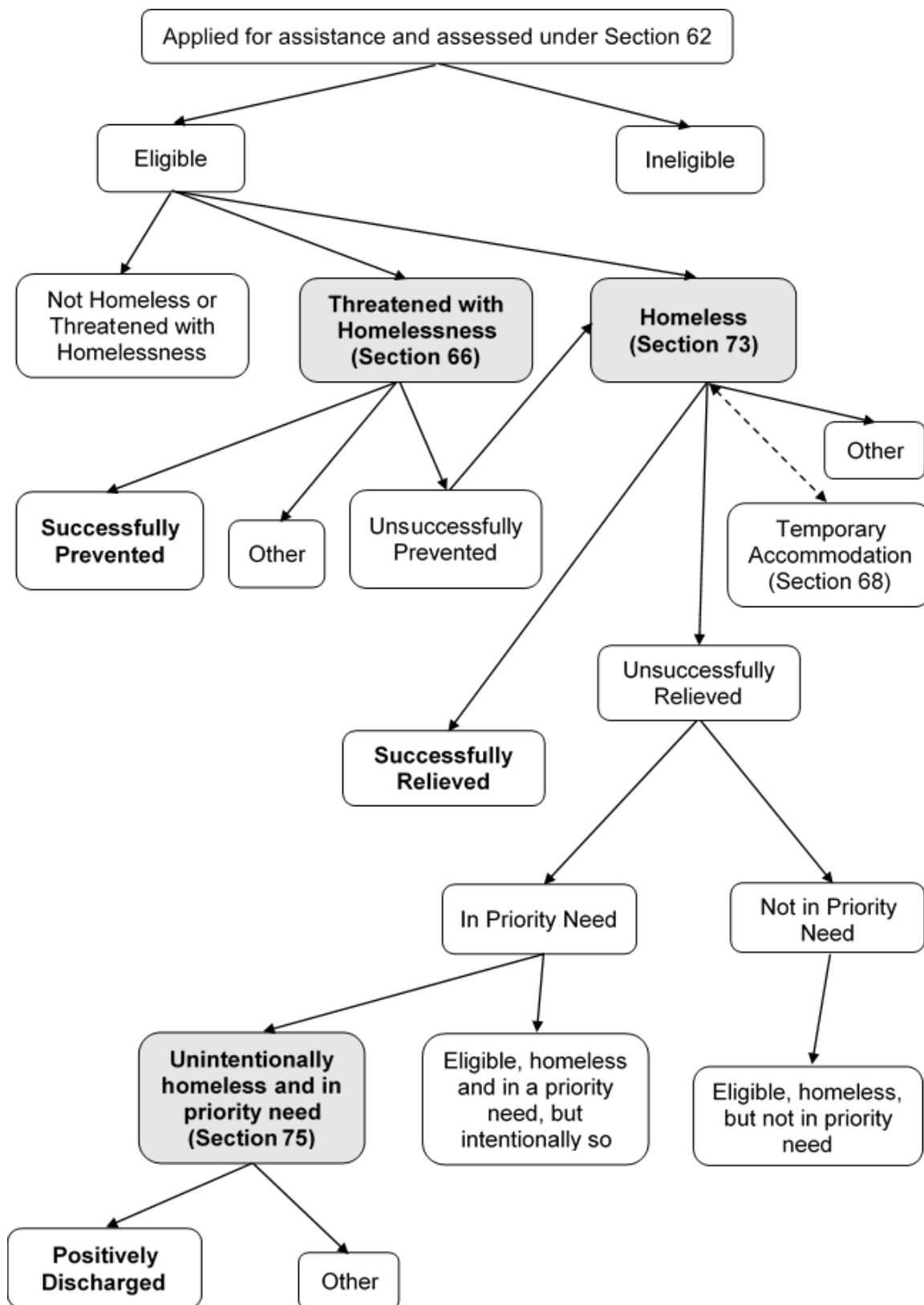
1.11 This means that more people now have a right to assistance than before, although an offer of social housing is no longer the main type of assistance available; instead, local authorities can more easily discharge their homelessness duties by making an offer of accommodation in the private sector.

³ Applications can be submitted by a third party on behalf of someone, but the individual must have given consent.

⁴ The use of Personal Housing Plans was recommended in the Code of Guidance but they are not a statutory requirement.

- 1.12 The changes to the legislation mean that addressing homelessness in Wales can now be understood to take place within three stages: (1) preventing homelessness (prevention); (2) relieving homelessness (relief); and (3) securing accommodation. The first two stages are available to all, regardless of priority need, intentional homelessness or local connection. Within this stage local authorities are required to take 'reasonable steps' to prevent or relieve homelessness when people are at risk of becoming homeless in the next 56 days or are actually homeless. Reasonable steps include: helping people to find accommodation; assisting with bonds and rent in advance; referring people to support services; and referring people to mediation services to help their family stay together and remain in their accommodation. The third stage comes into effect if the prevention and relief activities do not prevent people from becoming homeless. In this stage, the local authority is required to assess whether people qualify under the categories of priority need, unintentional homelessness and local connection. If households qualify for the duty to secure a home, the local authority must help them find suitable accommodation that must be available for at least six months.
- 1.13 In practice, this means that local authorities must now follow a series of duties as outlined in the legislation for both the prevention and relief of homelessness.

1.14 Each of these duties are explained below⁵.



Source: Welsh Government (2016: 4)

Figure note: 'Other' includes assistance refused, non- co-operation and other reasons

⁵ This does not take account of the local connection test process.

- 1.15 S62, the Duty to Assess, means that local authorities must carry out an assessment of a person's (or household's) circumstances, if that person approaches them for accommodation, or if they ask for assistance in retaining or obtaining other accommodation. The local authority will assess whether the person is homeless or will be homeless within the next 56 days (in other words, whether the person is threatened with homelessness). If the local authority accepts that the person is homeless or threatened with homelessness – that is, owed a duty of assistance – then the authority must assess: the circumstances leading to the person's homelessness/threat of homelessness; the housing needs of the person/their household; whether they have any support needs; whether any other duties apply; and what outcomes the person/their household want to achieve with the help of the authority and how they can support this.
- 1.16 Once the Duty to Assess has been discharged, if a person is accepted as being **threatened with homelessness** within 56 days under s62, and is eligible for help, then the local authority accepts the Duty to help prevent an applicant from becoming homeless (s66). The local authority must now carry out 'reasonable steps' (s65) as indicated above to help to prevent the person from becoming homeless.
- 1.17 If a person is accepted as **being homeless** and eligible for help under s62 of the Act, the local authority accepts the Duty to help secure accommodation (s73). If the person/their household is considered likely to be in priority need, the local authority will also place them in temporary accommodation (under s68 of the Act) while they undertake reasonable steps to help them secure accommodation. For households not considered likely to be in priority need, the local authority must still take reasonable steps under s73.
- 1.18 S75 of the Act – the Duty to secure accommodation - applies to those applicants who are in priority need, for example pregnant women; people with dependent children in the household; people who are vulnerable; people experiencing domestic abuse; people needing to leave their home due to an emergency, for example as a result of a fire or flood; 16 and 17 year olds; 18-21 year olds who might be at risk of abuse or were previously in the care system; ex-military personnel homeless on leaving the armed forces; and people who might be vulnerable as a result of being in custody or remand. If steps to relieve homelessness are unsuccessful, and the local authority is satisfied that the person/household is in priority need,

is eligible for help, (and if the authority is having regard to whether they are intentionally homeless, then they need to be satisfied that homelessness is unintentional) then they must accept the Duty to secure accommodation (once s73 has ended). The local authority then discharges this duty by securing an offer of accommodation for a period not less than six months, and this can now be an offer of a property in the private sector.

2. Methodological Approach to the Evaluation

2.1 The evaluation of the processes involved in implementing the Act and its impact began in 2016. The evaluation itself involved qualitative and quantitative research methodologies and a number of complementary phases utilising a range of different research approaches. At the project's inception the study team were guided by the Welsh Government and an Advisory Group comprising key stakeholders across Wales. Research instruments were developed by the research team and approved by Welsh Government. The following activities have been completed:

- Quantitative analysis of secondary data (2015-16/2016-17).
- Survey and review of 22 local authorities [first wave: June–August 2016/ second wave: August – October 2017].
- Consultation with national stakeholders [October–November 2016].
- Selection of six case study local authority areas to consult and engage with service providers and service users [September 2016].
- Case Study: Engagement and consultation with service users [first wave: October 2016–January 2017/second wave: June-July 2017].
- Case Study: Engagement and consultation with service providers [March – June 2017].
- Collation and review of existing information: policy and literature review.
- Focus group with Homelessness Network [January 2018]

Secondary analysis of homelessness statistics

2.2 All of this data were taken from the publicly available Statistics for Wales (Stats Wales) website. The homelessness statistics collected by the Welsh Government on a quarterly basis from local authorities were examined. In particular, the data for April 2016 – March 2017 (latest full year available) were utilised for this report, and comparisons were made with the previous year (2015-16)⁶.

⁶ Published in the Interim Report 2017.

Consultation with national stakeholders

2.3 Fifteen interviews were conducted with national stakeholders from the following organisations:

- Community Housing Cymru (1).
- Chartered Institute of Housing Cymru (1).
- Cymorth Cymru (1).
- Higher Education institution (1).
- Homelessness Network (1).
- Shelter Cymru (2).
- Private Landlords Association (1).
- Take Notice Project (1).
- Welsh Local Government Association (1).
- Welsh Government Housing Policy Division (4).
- Tai Pawb (1).
- Chartered Institute of Housing (1).

2.4 The above organisations/individuals were identified as being significant in shaping the Act, or as being in a position to provide an important perspective regarding its ethos, implementation and impact. Some of the stakeholders interviewed were involved in reviewing the previous homelessness legislation in Wales and developing the Housing (Wales) Act 2014. Others drafted and scrutinised the Act prior to implementation, some are involved in its strategic implementation and others were involved in developing the Code of Guidance. In order to maintain the anonymity of national stakeholders and the organisations they represent, no distinguishing information is included with the extracts from their interviews.

Local authority survey (First Wave)

2.5 The purpose of the survey was to gather both qualitative and quantitative information relating to the different stages outlined in the Act. The survey was developed by the research team following guidance from the Welsh Government and key stakeholders from across Wales, and piloted with one local authority to check the content prior to rolling out to the rest of the local authorities.

2.6 Responses (one from each local authority housing team) were obtained between 4th July and 25th August 2016. Key contacts in the local authority housing teams were sent an email from the Welsh Government introducing the survey including a link to the survey. Subsequent reminder emails were sent by the research team and the Welsh Government until a response had been received from each local authority (i.e., 100% response rate).

Local authority survey (Second Wave)

2.7 The second wave survey again aimed to gather both qualitative and quantitative information relating to the Act, but more specifically, to understand changes in the experiences of the local authority housing team in the year since they completed the first wave survey. The survey was largely based upon the first wave survey, with some modifications to capture recent changes, a broader range of information (for example, questions were added on steps taken to maintain contact with households that miss appointments and how local authorities determine that a household has refused to co-operate), and to better facilitate categorisation of responses.

2.8 The second wave survey was administered in much the same way as the first: key contacts in the local authority housing teams were sent an email including a link and introducing the survey. A 100% response rate (i.e., one response from each local authority) was again achieved following reminder emails from the research team and the Welsh Government. Responses (one from each local authority housing team) were obtained between 11th August and 2nd October 2017⁷.

2.9 Respondents to the local authority survey are referred to as such throughout the findings chapters.

Selection of case studies

2.10 Six case studies were selected on the basis of geography: urban/rural/coastal and north/mid/south Wales and whether housing stock had been retained by the local authority or transferred to an RSL⁸. Additional criteria extrapolated from Stats Wales, including performance based on homelessness successfully prevented (s66) and relieved (s73) also guided selection. Other studies currently being conducted by Shelter Cymru⁹ and the Wales Audit Office¹⁰ were also taken into account, although this did not necessarily preclude inclusion.

⁷ See Annex 1 for the Local Authority Survey Wave 2.

⁸ Eleven out of 22 local authorities have transferred stock to an RSL.

⁹ In Cardiff, Vale of Glamorgan, Ceredigion, Flintshire, Conwy and Rhondda Cynon Taf.

¹⁰ In Bridgend, Carmarthenshire, Denbighshire, Merthyr Tydfil and Swansea.

Case Study: Engagement and consultation with service users

[first wave: October 2016–January 2017]

- 2.11 One of the key components of this evaluation was to explore the impact of service changes from the perspective of the people who have received support. In order to understand the experiences of services and the impact of the support people have received, the first wave of longitudinal qualitative research was undertaken with people who presented to homelessness services in each of the case study areas.
- 2.12 The project team worked in partnership with case study local authorities to gain access to a sampling frame to ensure that respondents with a demographic spread were accessed including: those who are homeless/at risk of homelessness; a range of household types; and people with protected characteristics. Members of the research team were located at the offices of participating local authorities where appropriate as this offered the most effective means by which to recruit participants in wave 1.
- 2.13 The research team aimed to interview 25 service users in each case study area in the first wave in anticipation of some attrition over the six to eight month period. In total, 154 interviews were conducted across the six local authority areas and the sample was influenced by the people who presented as homeless or were receiving assistance from the local authorities during the time of the fieldwork. Most of the interviews were arranged by local authority and hostel staff and conducted at local authority offices, or hostels and shelters. While the initial goal was to interview people as they approached the local authority for help for the first time, this only proved possible in urban areas where the volume of people seeking help was high enough to do so. For more rural areas, the initial sampling strategy was adapted and expanded to include people who were already receiving services. Researchers spent additional time in these areas, and conducted phone interviews where requested.
- 2.14 The purpose of collecting data from service users was to gain knowledge about their lived experiences of accessing and navigating services and experiences of prevention and pathways to support. Participants were given the option to have interviews conducted in Welsh or English, (all opted to be interviewed in English).
- 2.15 The focus of the wave 1 interview was to capture relevant baseline data for follow up in wave 2 and to establish a relationship with research participants. As such, interviews in wave 1 were fairly structured and short, and designed to take no more than around 15 minutes.

- 2.16 The interviews focused primarily on four key themes:
- Reasons for accessing support from Housing Solutions (including reasons for becoming homeless/being at risk of homelessness and any support needs/protected characteristics they may have).
 - Experiences of the process of support (positive and negative) (e.g. how well people feel they were supported; were they treated with dignity and respect during initial contact with the service).
 - Level of housing stability they expect/hope to have achieved over the following six months.
 - Views on perceived gaps in/benefits of support.
- 2.17 The purpose and nature of the research was explained in detail to all potential interviewees. The researcher explained that participation in the research was entirely voluntary, that people were free to withdraw from the research at any time, and that all information obtained would be stored securely and treated in confidence. Researchers stressed their independence from the local authority and that participation in the research would have no impact on the support they received. Potential participants were also invited to ask any questions they had about the evaluation. Informed consent was obtained and recorded before any interviews were conducted. With permission, interviews were digitally recorded (only one person refused permission and in this case detailed notes were taken by the researcher). Participants were offered a £10 shopping voucher as recompense for their time.
- 2.18 After the completion of a wave 1 interview, participants were asked for their permission to be re-contacted in six to eight months. All interviewees agreed and when asked, provided the research team with their contact details, and in many cases the contact details of family members, friends and/or support workers who could be contacted. After six months, all those participating in wave 1 of the research were re-contacted and invited to attend a second interview.

Case Study: Engagement and consultation with service users

[second wave: June-July 2017]

- 2.19 Re-contact efforts with service users were extensive. Members of the study team asked service users to confirm whether they gave permission to ask the local authority for their contact details should these have changed between the two waves of the research and all agreed. In many cases however, the local authority was unable to provide further contact details beyond those already collected by the research team. In some instances service

users' families were unaware of their whereabouts. Numerous attempts were made to re-contact interviewees via phone call, text, email and letter (including through the details of second and third contacts). The study team also found wide variation in the knowledge among local authority staff regarding the circumstances of individual cases. Where possible information from local authority/hostel staff/service users' family members has been included to indicate the housing situation of service users at the time of the second wave of the research. The most complete information about people's housing circumstances at the second wave of interviews was obtained from those case study areas where the study team worked with hostel staff to identify service users to participate in the research. In total, the housing situation of 87 people was verified, and the circumstances of 67 people were unknown.

Table 1: completed interviews in wave 1 and 2

Area	Interviews completed, wave a	Interviews completed, wave b	Contact made, status confirmed, but respondent unable or unwilling to do full interview, wave b	Housing status confirmed by council or family member	Total housing confirmed direct and indirect	Total status unknown
1	26	11	3	8	22	4
2	27	12	0	2	14	13
3	25	6	1	8	15	10
4	21	9	0	0	9	12
5	25	13	1	2	16	9
6	30	6	0	8	14	16
Total	154	57	5	28	90	64
Total confirmed direct			62			154

2.20 In areas two, three and six, there was a very high percentage of single men – a potentially transient cohort – who were interviewed in hostels or night shelters, which is reflected in lower numbers of follow up interviews. For those interviewed in hostels in other areas, lower numbers participated in the second wave of the research.

2.21 In case study area one, 11 out of the original 26 people took part in a follow up interview. Contact was made with three others, and while it was not possible to conduct a second interview, they verified their housing circumstances, with two people placed in supported RSL accommodation, and one in Temporary Accommodation. It was not possible to re-contact 12 service users. Of these the local authority and hostel confirmed that one person had moved in with family; two had moved into social housing; a third remained in the hostel while waiting for private sector accommodation to become available; one had moved into supported housing; one had been issued with an injunction, was asked to leave to hostel and his whereabouts were unknown; two had been evicted from the hostel

after violent psychotic episodes, one of whom had been placed in Temporary Accommodation and the other in a B&B. The whereabouts of four people were unknown.

- 2.22 In area two, 12 out of the original 27 people participated in a follow up interview. Re-contact was not possible with 15 service users. Of these, hostel staff informed the study team that two people interviewed in the hostel had since moved into social housing. The whereabouts of the remaining 13 people were unknown.
- 2.23 In case study area three, six out of 25 service users took part in a follow up interview. Contact was made with one other person who did not want to take part in the interview but confirmed that he had been in prison and was sleeping rough. Fifteen of the remaining 18 interviewees had been residing in hostels during the first wave of the fieldwork. Hostel staff informed the study team that two people had been placed in social housing, three people were in prison, and two people were assumed to be rough sleeping. One person had been asked to leave the hostel, and another planned to leave. The whereabouts of 8 people was unknown.
- 2.24 In case study area four, nine out of 21 people took part in a follow up interview. The study team were unable to re-contact 12 interviewees and the whereabouts of these were unknown.
- 2.25 In area five, 13 out of the original 25 service users participated in a follow up interview. Contact was made with one other person who was unable to continue with a full interview, but confirmed that he had been housed in private rented accommodation. The study team were unable to re-contact ten interviewees. Of these, the local authority confirmed that one person had been placed in social housing, and a secondary contact confirmed that another person remained in the same unstable accommodation as in the first wave of the research and was still seeking rehousing. The whereabouts of the remaining 9 people was unknown.
- 2.26 In case study area six, six out of the original 30 service users participated in a follow up interview. The study team were unable to re-contact 24 interviewees. The local authority/family members confirmed that that people two had died, one person was in a residential detox unit, one was in prison, one was in hospital, one had moved into social housing, and two were rough sleeping. The whereabouts of 16 people was unknown.

2.27 Direct contact was made with a total of 35 men and 22 women in the second wave of interviews, as compared to the 99 men and 55 women of the original sample. Of this 57, 56 identified as white and British. In wave a, one respondent declined to give her age, giving a total of 153 responses to this question. The age and family composition of service users is presented in the figures below:

Figure 1: Age of service users

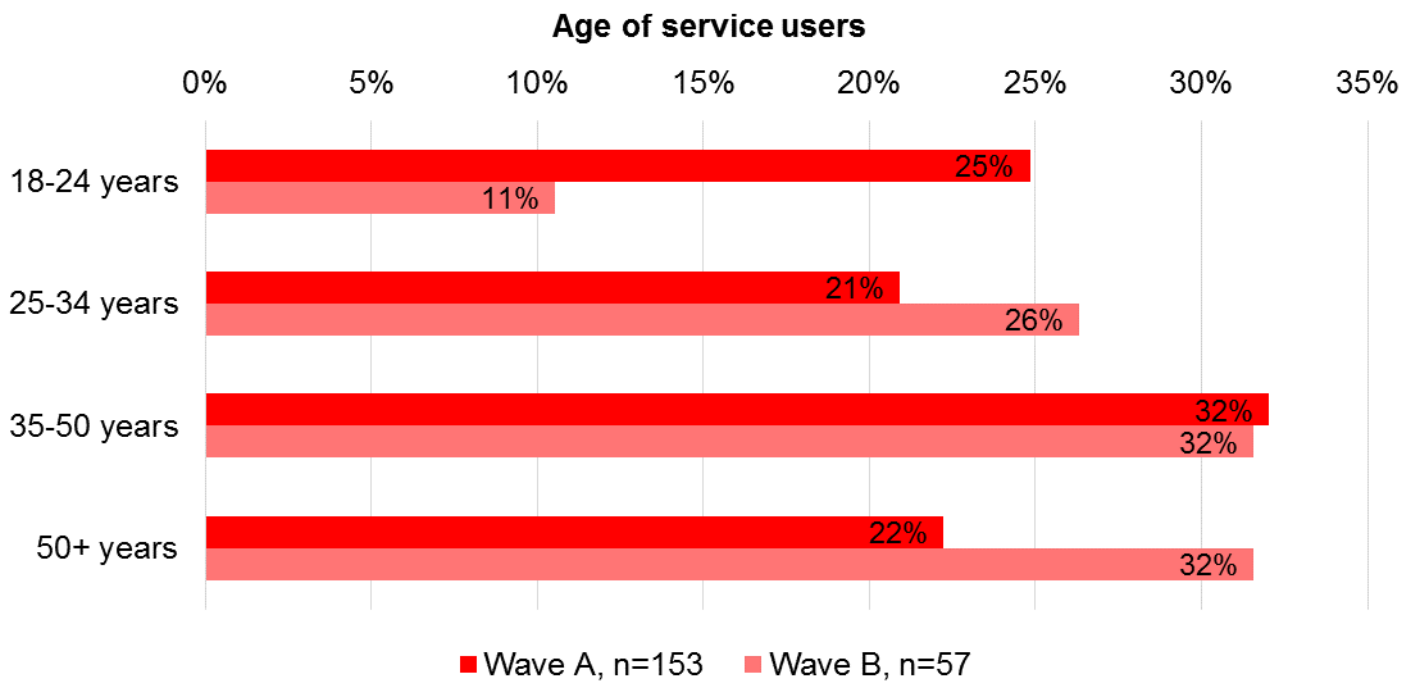
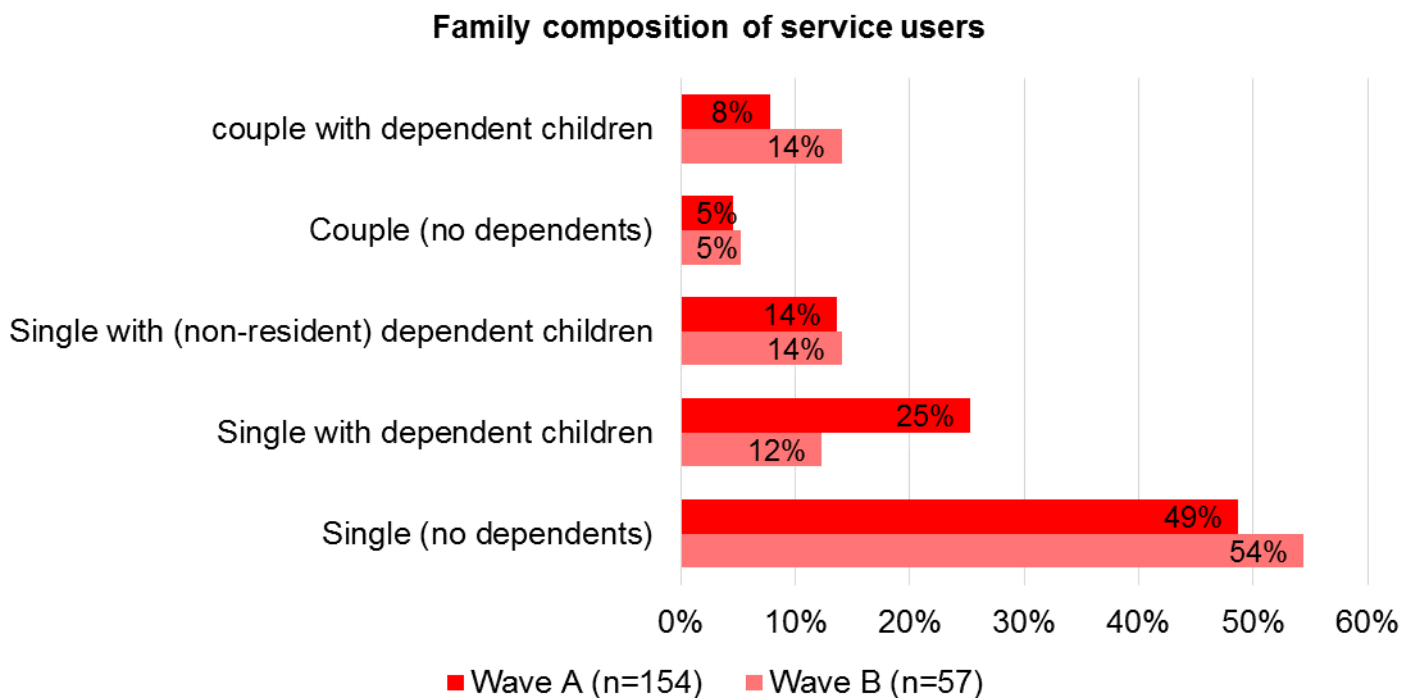


Figure 2: Family composition of service users



- 2.28 Apart from the preponderance of single people interviewed in both waves, the only other clear showing is the lower proportion of young people under the age of 25 and single parents re-interviewed. This could be due to multiple factors impossible to ascertain in the absence of an interview, but most likely connected to their precarious circumstances.
- 2.29 Service users were asked a range of questions aimed to elicit details information about their housing circumstances. Most interviews took place face to face and some were conducted by telephone (at the request of the service user). Members of the study team provided a recap of the previous interview before asking about:
- what has changed with regard to housing circumstances since the previous interview;
 - their current housing situation and if there was anything that they would like to change;
 - whether they had a local connection in the area they applied for housing;
 - what help they had received from the local authority, how well they understood the information given to them;
 - whether they had a Personal Housing Plan;
 - their experiences of support; and,
 - views on the private rented sector, local authority and RSLs¹¹.
- 2.30 Throughout the findings chapters service users (following excerpts from interviews) are referred to as SU with the number of the local authority case study area following this.

Interviews with service providers (March – June 2017)

- 2.31 During this phase, consultations with a variety of service providers were undertaken representing the statutory sector, Registered Social Landlords (RSLs) and the Third Sector across the six case study sites. The research team endeavoured to consult across these sectors in each site, collecting the views and experiences of key stakeholders including heads of service, Supporting People leads, service managers and frontline staff.
- 2.32 Six case studies were selected on the basis of geography (urban/rural/coastal and north/mid/south Wales) and whether housing stock had been retained by the local authority or transferred to an RSL. In total 148 people took part in consultations. 79 were employed in the statutory sector, 24 were employed by Registered Social Landlords and 45 represented the Third Sector. In terms of the role of participants, this covered the spectrum of positions from frontline officers, to team and service managers, as well as leads and heads of departments. The study team also interviewed councillors who held relevant portfolios and people employed in very specific roles that were linked to a

¹¹ See Annex 2 for service user interview schedule wave 2.

particular area of practice: for example, officers mandated to work with prison leavers, or officers with a specialist knowledge of mental health (as well as homelessness). As such, including people from different sectors, in addition to people who occupy different roles, has enabled a multitude of perspectives and experiences to be collected as data informing this evaluation.

2.33 A total of 148 service providers across a range of sectors and authorities were consulted. Consultations were undertaken between March and June 2017¹².

2.34 Heads of Service were asked about the following issues:

- their role in implementing the prevention orientated approach;
- the implications that Part 2 of the Act has had for their authority/organisation;
- key prevention activities in their authority;
- how has the Act made support person-centred;
- what impact the legislation has had on services provided to people who present as homeless who have no local connection/how local connection is interpreted;
- experience of partnership working under the Act;
- how the Act is impacting on other agendas in their authority;
- how effectively Supporting People services are enabling the implementation of Part 2 of the Act;
- how clear the pathways for homeless people with support needs;
- the impact that Part 2 of the Act has had on those in priority need and those not in priority need;
- the impact of the Act on those with protected characteristics; the training associated with implementation;
- the best use of resources;
- the usefulness of the Code of Guidance;
- any changes to recording and monitoring procedures;
- views on statistical return data;
- strengths of and concerns about the Act;
- any unanticipated consequences arising from the implementation of the Act;
- further actions which could be taken by Welsh Government to support implementation of the Act;
- any steps to reduce administrative burden on staff;
- and partnership arrangements/events¹³.

¹² See Annex 3 for a detailed breakdown of the service provider consultation across case study areas.

- 2.35 Focus group discussions with front line local authority staff addressed the following topics:
- key homelessness prevention activities;
 - person-centred support;
 - challenges in role due to the Act;
 - outstanding training needs;
 - provisions for young people/single people/people with protected characteristics/rough sleepers;
 - extending the period when people are threatened with homelessness to 56 days;
 - interpretation of reasonable steps;
 - usefulness of Code of Guidance; and
 - strengths and weaknesses of the Act¹⁴.
- 2.36 Focus group discussions with RSL/third sector frontline staff focused on the following topics:
- role in relation to homelessness;
 - key prevention activities;
 - person-centred support;
 - partnership working;
 - referral processes;
 - working arrangements with the local authority to prevent evictions;
 - changes/challenges to role following the implementation of the Act;
 - provisions for young people/people with protected characteristics/rough sleepers;
 - and the strengths and weaknesses of the Act¹⁵.
- 2.37 Throughout the findings chapters, in order to denote the sector and case study areas service provider participants from local authorities are referred to as LA; participants from RSLs are referred to as RSL; and participants from third sector organisations are denoted as TA. The case study area follows this depiction.

¹³ See Annex 4 for the interview schedule for heads of service.

¹⁴ See Annex 5 for focus group questions for front local authority staff.

¹⁵ See Annex 6 for focus group questions for RSL/third sector frontline staff.

3. Secondary analysis of homelessness statistics

- 3.1 This section examines the homeless statistics which the Welsh Government collects on a quarterly basis from local authorities. All data is taken from the publicly available Stats Wales website. Unless otherwise stated, all figures used here are for April 2016 - March 2017. This represents the latest available full year of data. As with the interim report, data for rough sleepers is not analysed here due to the experimental nature of the data.
- 3.2 At the time of writing the interim report, the statistics had been temporarily de-designated as National Statistics due to concerns over the quality of data returned to the Welsh Government under the Act and the time needed for local authorities to adapt to the changes. The de-designation ended in July 2017, following the Welsh Government's work with local authorities to resolve the issues. Still, there is a need for caution when comparing data over time, due to the data quality issues outlined with the 2015-16 data, and changes to the quarterly and annual returns for 2016-2017 (see [Welsh Government Annual Release](#), 2016-17: Page 5)
- 3.3 Other data limitations identified in the interim report persist. These concern the unavailability of raw data, data rounding, and the collection of data in aggregate tables (i.e., not individual record data). While the published data and use of asterisks is for disclosure reasons, it means that the extent to which relationships in the data can be analysed is limited, particularly due to data rounding through the use of asterisks when there is a total of three or fewer for a particular category. Moreover, the use of asterisks means that the totals may not always tally.
- 3.4 In terms of the findings, there are a number of continuities and divergences from the 2015-16 data. These will be discussed in more detail below, however, key changes include increases in the number of recorded cases at each of the main stages (and most outcomes now taking place at s73, rather than s66 as had been the case in 2015-16); allocation of local authority social housing was the most common action taken to prevent and relieve homelessness in 2016-17; and the number and proportion of households deemed to have become homeless intentionally has reduced compared to the previous year as have cases of non-co-operation of households assessed under s75 (eligible, unintentionally homeless and in priority need).

Households threatened with/accepted as homeless

- 3.5 The figures reveal an increase in the number of outcomes at each of the main stages when compared to 2015-16¹⁶. It should be noted, however, that households may be counted more than once if they apply for assistance on more than one occasion in the year, and are deemed eligible for support. Most outcomes now take place under s73 (duty to help secure accommodation), in contrast to 2015-16 when most outcomes were under s66 (threatened with homelessness). The main reasons for s66 and s73 remain the same, however. For households threatened with homelessness these are loss of rented or tied accommodation (3,345 households), parent no longer willing or able to accommodate (1,317 households), and breakdown of relationship with partner (1,137 households). For those households assessed as homeless under s73, the most common reasons are breakdown of relationship with partner (2,304 households), followed by loss of rented or tied accommodation (1,947 households), and parent no longer willing or able to accommodate (1,668 households).
- 3.6 While the number of those assessed as in priority need has increased since 2015-16, it still has the lowest numbers of the main outcomes, due to the emphasis on prevention and help to secure. The main reasons those in priority need were homeless in 2016-17 are similar to 2015-16, including: loss of rented or tied accommodation (540 households), breakdown of relationship with partner (453 households), and parent no longer willing or able to accommodate (327 households).

¹⁶ In 2015-16, the total number of households was as follows: 7128 (s66); 6891 (s73); 1,611 (s75).

Table 2: Main reason for homelessness (2016-17)

	Threatened with homelessness (s66)	Assessed as homeless (s73)	In priority need (s75)
Parent no longer willing or able to accommodate	1,317	1,668	327
Other relatives or friends no longer willing or able to accommodate	870	1,452	222
Breakdown of relationship with partner (Total)	1,137	2,304	453
Non-violent	627	1,143	129
Violent	510	1,161	321
Violence and harassment	93	240	57
Racially motivated	*	6	*
Due to religion/belief	*	3	*
Due to gender reassignment (gender identity)	*	*	*
Due to sexual identity/orientation	3	3	*
Due to disability	*	6	*
Due to another reason	87	222	54
Mortgage arrears (repossession or other loss of home)	192	90	12
Rent arrears on social sector dwellings	393	159	9
Rent arrears on private sector dwellings	531	192	33
Loss of rented or tied accommodation	3,345	1,947	540
Current property unaffordable	249	63	18
Current property unsuitable	348	318	81
Prison Leaver	159	1,323	144
In institution or care (e.g. hospital, residential home, army etc.)	234	357	63
Other (including homeless in emergency, returned from abroad, sleeping rough or in hostel)	336	771	114
Total households	9,210	10,884	2,076

Note: 1. * The data item is disclosive or not sufficiently robust for publication.

2. All the figures are rounded independently to the nearest 3 to protect the identity of individuals. As a result, there may be a difference between the sum of the constituent items and the total.

Source: Stats Wales

Priority need by household type

- 3.7 When examining households in priority need by household type, single person households (1,005) predominate, followed by single parent households with dependent children (759), and couples with dependent children (201). While the overall numbers have increased from 2015-16, the proportion of households in priority need is broadly similar by household type. More specifically, there is a slightly higher proportion of single parents in 2016-17 (37% compared to 34% in 2015-16), and slightly lower proportion of couples with dependent children (10% compared to 12% in 2015-16) and single person households (48% compared to 49% in 2015-16)¹⁷.
- 3.8 The reasons for being in priority need are again broadly similar to 2015-16. For single person households during 2016-17 it is primarily due to a member being vulnerable¹⁸, followed by fleeing domestic violence or threatened violence, and being a former prisoner who is vulnerable as a result of being held in custody. The main changes were that fleeing domestic violence or threatened violence increased from 123 households (2015-16) to 147 households (2016-17), while being a former prisoner decreased from 129 households (2015-16) to 84 households (2016-17). It is important to note, however, note that there were changes to the way that data is collected on former prisoners for 2016-17¹⁹.

¹⁷ In 2015-16, the figures were: single person households (792), single parent households with dependent children (543), and couples with dependent children (189).

¹⁸ Households where a member is vulnerable includes households where a member is vulnerable due to old age, physical disability or mental illness/learning disability, other violence, abuse or harassment, alcohol or substance misuse, and those aged over 21 that are vulnerable to exploitation.

¹⁹ 'A former prisoner who is vulnerable as a result of being held in custody' replaced 'A former prisoner who after being released from custody has no accommodation to return to', which was used on the 2015-16 return.

Table 3: Households in priority need (Section 75) by household type (2015-16)

	Couple with dependent children	Single parent household with dependent children	Single person household	All other household groups	Total
Households with dependent children	195	660	N.A.	9	864
Households where a member is pregnant and there are no other dependent children	N.A.	N.A.	69	33	102
Households where a member is vulnerable	3	12	576	54	645
A care leaver or person at particular risk of sexual or financial exploitation, 18 years or over but under the age of 21	*	*	63	6	69
A 16 or 17 year old	*	3	57	3	63
A person fleeing domestic violence or threatened violence	*	84	147	6	237
A person leaving the armed forces	*	*	*	*	*
Households homeless in emergency	*	*	6	*	6
A former prisoner who is vulnerable as a result of being held in custody	*	*	84	*	84
Total households	201	759	1005	111	2076

Note: All the figures are rounded independently to the nearest 3 to protect the identity of individuals. As a result, there may be a difference between the sum of the constituent items and the total.

Source: Stats Wales

Actions taken by local authority

3.9 Across Wales the proportion of prevention cases that were successful was 62%. When it comes to relief, the proportion of successful cases dips to 41%, before rising again to 81% for positive discharge. This pattern is broadly similar to in 2015-16 in that there is an emphasis on prevention rather than relief but that discharge has the highest success rate, in part due to the smaller number of households that make it to this stage²⁰. However, the overall increase in outcomes at s73, reported above, combined with the slightly lower success rate could mean that local authorities are facing difficulties in relieving households at this stage.

3.10 Areas which have reported the most successful preventions are Gwynedd, Pembrokeshire, Caerphilly, Isle of Anglesey, and Swansea. This represents a significant increase in successful preventions for Isle of Anglesey, and to some extent

²⁰ In 2015-16 the proportion of prevention cases that were successful was 64.5%; relief 45.1%, and positive discharge 79.7%.

Pembrokeshire, as they had 60% and 69% success rates in 2015-16 respectively. In the other three local authorities, however, the percentage of successful preventions was lower in 2016-17 than in 2015-16. In Gwynedd there was a reduction from 85% in 2015-16 to 78% in 2016-17, while in Swansea it was down from 75% to 73%, and in Caerphilly from 78% to 73%.

3.11 It is important to note, however, that this does not necessarily reflect on the quality of work taking place in the local authorities. Indeed, the statistics do not tell us about the types of cases, resources available, nor pressures they may face. Also, the data does not refer to work undertaken under s60 (duty to provide information, advice and assistance), nor the work undertaken which results in some 'not homeless' decisions.

Table 4: Positive action taken, by local authority (2016-17)

	Successful prevention (Section 66) %	Successful relief (Section 73) %	Positive discharge (Section 75) %
Wales average	62	41	81
Blaenau Gwent	52	58	100
Bridgend	67	47	57
Caerphilly	73	46	82
Cardiff	52	27	92
Carmarthenshire	64	43	83
Ceredigion	71	48	61
Conwy	58	42	75
Denbighshire	54	31	76
Flintshire	63	49	80
Gwynedd	78	66	71
Isle of Anglesey	73	63	100
Merthyr Tydfil	61	36	100
Monmouthshire	58	50	95
Neath Port Talbot	55	42	65
Newport	49	30	69
Pembrokeshire	73	52	91
Powys	61	44	75
Rhondda Cynon Taf	63	50	85
Swansea	73	54	78
Torfaen	50	28	61
Vale of Glamorgan	57	47	65
Wrexham	64	62	60

Source: Welsh Government Stats Wales

Types of actions taken

- 3.12 As with the 2015-16 statistics, preventative work has involved many more cases of obtaining alternative accommodation (4,380 households) than supporting people to remain in their existing homes (1,338 households). For most households, alternative accommodation has taken the form of local authority social housing (1,050 households), followed by PRS accommodation through landlord incentive schemes (939 households). This figure is striking given that only 11 of the 22 local authorities have retained their own housing stock. As such, local authority social housing has overtaken PRS accommodation since the 2015-16 data return, when PRS accommodation, both with and without landlord incentive schemes, were the most frequent outcomes.
- 3.13 Of those given support to remain in their own homes, the most frequent action (252 households) is negotiation or legal advocacy. This is now followed closely by resolving rent or service charge arrears (243 households). Taken together, these actions highlight the frequency of which financial support is offered by local authorities.
- 3.14 In terms of relief, local authority social housing (774 households) was the most frequently reported action, followed by PRS accommodation with landlord incentive scheme (738 households). This suggests increased use of social housing for relief, while in 2015-16 it was only the fourth most frequently reported action.

Table 5: Actions taken to prevent and relieve (2016-17)

Remain in existing home	Prevented	Relieved
Mediation and conciliation	159	
Of which are for a young person	69	
Financial payments	156	
Debt and Financial Advice	102	
Resolving Housing and Welfare Benefit problems	138	
Resolving rent or service charge arrears	243	
Measure to prevent domestic abuse	51	
Negotiation or legal advocacy to ensure that someone can remain in accommodation in the private rented sector	252	
Mortgage arrears interventions or mortgage rescue	36	
Providing other assistance or specialist support for problems	198	
Total: Remain in existing home	1,338	
Obtain alternative accommodation		
Any form of non self-contained supported accommodation	117	540
Private rented sector accommodation with landlord incentive scheme*	939	738
Private rented sector accommodation without landlord incentive scheme	942	717
Accommodation arranged with friends, relatives or returning home	315	420
Self-contained supported accommodation	126	435
Social Housing - Local Authority	1,050	774
Social Housing - RSL	795	720
Low cost home ownership scheme, low cost market housing solution	6	3
Other assistance or support	90	153
Total: Obtain alternative accommodation	4,380	4,500
Overall total	5,718	

Note: 1. *For example, cashless bond, finder's fee, deposit payment, rent in advance, landlord insurance payment. 2. All the figures are rounded independently to the nearest 3 to protect the identity of individuals. As a result, there may be a difference between the sum of the constituent items and the total.

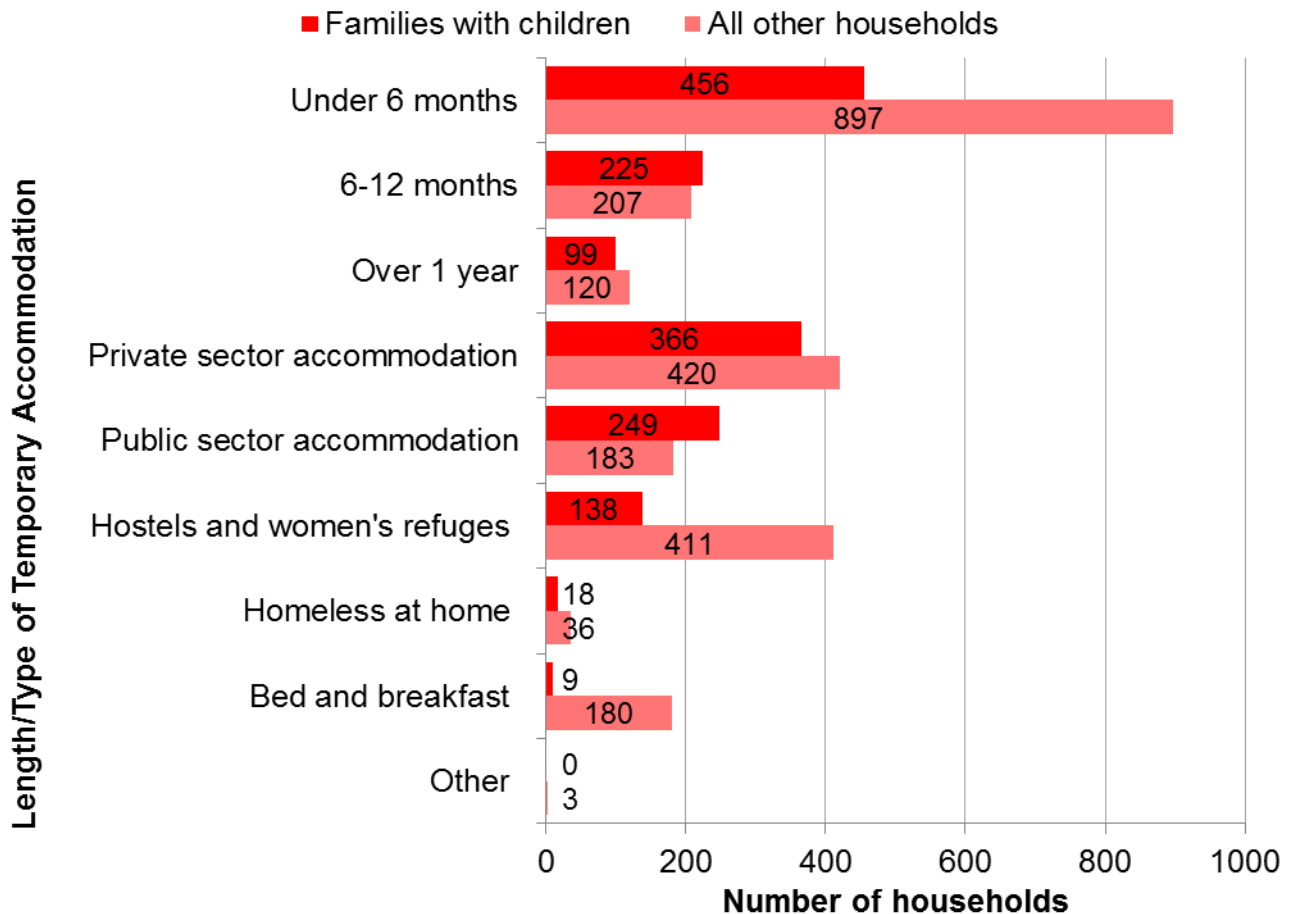
Source: Welsh Government Stats Wales

Temporary accommodation

3.15 At 31st March 2017, a total of 2,013 households were accommodated temporarily, which marks an increase of 138 households from the same period in 2016²¹. Again, the majority were in private accommodation (786 households). It is still the case that fewer families with children were in temporary accommodation, compared to other households. There are also similar trends to 2015-16 in terms of the length of time that households have been in temporary accommodation, with over two-thirds of households that are housed temporarily being in that accommodation for under six months.

²¹ The latest figures from Stats Wales reveal that 2,088 households were temporarily accommodated in September 2017. These figures have not been used here as the data cannot be broken down by length of time in temporary accommodation.

Figure 3: Temporary accommodation length and type by household (2016-17, Jan-Mar)



Note: 1. All the figures are rounded independently to the nearest 3 to protect the identity of individuals. As a result, there may be a difference between the sum of the constituent items and the total. 2. Does not include figures of less than 3 households which are shown as an asterisk on Stats Wales.

Source: Welsh Government Stats Wales

Demographic characteristics

3.16 When examining outcomes by gender, it should first of all be noted that there continues to be more female than male households receiving outcomes. As in 2015-16, of those receiving a positive outcome at the prevention and discharge stages, the majority were women. More specifically, the female totals were 3,576 for prevention and 1,107 for positive discharge (63% and 66% of the respective totals). The majority of those receiving a positive outcome at the relief stage were male (2,418 households; 54% of the total).

3.17 The numbers of BME households receiving positive outcomes at the prevention and relief stages is 324 and 246. This is 6% and 5% of cases at the respective stages, which is lower than the 7% of overall cases from BME backgrounds. When it comes to positive discharge, the figures for the BME population (240) rise to 14% of cases. These figures are broadly similar to those for 2015-16, when positive outcomes for BME households were as follows: prevention 6%, relief 7%, and positive discharge 15%.

Table 6: Prevention, relief and positive discharge demographics (2016-17)

Gender and age groups		Prevention	Relief	Positive discharge	Total
Female 6765 (57%)	Age 16-17	69	78	33	183
	Age 18-24	843	603	339	1,785
	Age 25 and over	2,664	1,398	735	4,797
	Female total	3,576	2,079	1,107	6,765
Male 5097 (43%)	Age 16-17	45	66	27	138
	Age 18-24	357	504	84	948
	Age 25 and over	1,713	1,845	456	4,014
	Male total	2,115	2,418	567	5,097
Unknown age		27	*	*	30
Total Female, Male and Unknown		5,718	4,500	1,674	11,892
Ethnicity					
White 10026 (84%)		4,923	3,789	1,311	10,026
BME 810 (7%)	Mixed	24	36	30	93
	Asian or Asian British	81	45	48	171
	Black or Black British	114	93	72	279
	Other ethnic group	105	72	90	267
	BME total	324	246	240	810
Unknown ethnicity		468	465	120	1,056
Total White, BME and Unknown		5,718	4,500	1,674	11,892

Note: 1. * The data item is disclosive or not sufficiently robust for publication. 2. All the figures are rounded independently to the nearest 3 to protect the identity of individuals. As a result, there may be a difference between the sum of the constituent items and the total.

Source: Welsh Government Stats Wales

Positive discharge

- 3.18 As noted above, positive discharge does not necessarily mean that those households have found accommodation. However, the proportion of priority need households accepting an offer of accommodation through the allocation scheme (1,410 out of 2,076 households) continues to increase²², which suggests that alternatives might be limited for households that make it to this stage. Indeed, the numbers accepting a private sector offer remain relatively small (201). It is important to note, however, that some allocation schemes only offer accommodation to homeless people at s75, and so these figures are to some extent a result of the limited options for homeless people before this stage.
- 3.19 Of those not offered accommodation, the most frequent reason is the same as in 2015-16: voluntarily ceased to occupy accommodation (156 households). Overall, the proportion of households deemed to have become homeless intentionally (84 households), has reduced since 2015-16 when there were 90 households and the proportion refusing to co-

²² 67.9% of households accepted an offer of accommodation in 2016-17, compared to 66.6% in 2015-16.

operate has also reduced very slightly from 2.1 per cent to 1.6 percent, whilst the number remained unchanged at 33 households²³.

Table 7: Reasons for discharge of duty under section 75 (2016-17)

Reason	No.
Ceased to be eligible	18
Withdrawal of application	78
Mistake of fact	*
Became homeless intentionally from accommodation provided under section 75	84
Accepted an offer of accommodation through the allocation scheme (part vi 1996 HA)	1,410
Accepted a private sector offer	201
Voluntarily ceased to occupy accommodation made available under section 75	156
Refusal of an offer of accommodation through the allocation scheme (Part VI 1996 HA)	81
Refusal of an offer of suitable accommodation in the Private Rented Sector	9
Refusal of an offer of suitable interim accommodation under section 75	6
Refusal to co-operate	33
Total	2,076

Note: 1. * The data item is disclosive or not sufficiently robust for publication. 2. All the figures are rounded independently to the nearest 3 to protect the identity of individuals. As a result, there may be a difference between the sum of the constituent items and the total.

Source: Welsh Government Stats Wales

Summary

3.20 While there are limits in the extent to which comparisons can be made due to previous data quality issues, a number of key changes can be seen from the 2015-16 data:

- There have been increases in the number of outcomes recorded at each stage when compared to 2015-16. Most outcomes now take place under s73 (duty to help secure accommodation).
- Allocation of local authority social housing has overtaken PRS accommodation as the most frequent action taken to prevent and relieve homelessness in Wales. This figure is striking given that only 11 of the 22 local authorities have retained their own housing stock.
- The proportion of households deemed to have become homeless intentionally, and refusing to co-operate has reduced at s75.

²³ 4.1% of households discharged under s75 in 2016-2017 were deemed to have become homeless intentionally from accommodation provided under section 75, compared to 5.8% in 2015-16. 1.6% of households were considered to have refused to co-operate in 2016-17, compared to 2.1% in 2015-16.

3.21 There are also a large number of continuities with the 2015-16 data, however. These include:

- Single person households still make up the majority of households in priority need, followed by single parent households with children. The reasons for being in priority need remain the same: due to a family member being vulnerable, followed by fleeing domestic violence or the threat of domestic violence.
- Preventative work continues to involve many more cases of obtaining alternative accommodation than supporting people to remain in their own homes.
- While there has been a slight increase in the use of temporary accommodation, patterns of accommodation use remain the same. The majority of households in temporary accommodation do not contain children, are housed in private sector accommodation, and are in that accommodation for less than six months.
- There continue to be more female than male households receiving outcomes. However, the majority of those receiving outcomes at the relief stage are male.
- BME households continue to be under-represent in outcomes at the prevention and relief stages, but over-represented at positive discharge.
- The proportion of priority need households accepting an offer of accommodation through the allocation scheme continues to increase. While this may suggest that alternatives might be limited for households that make it to this stage, it is also partly due to limited options available before this stage - particularly as some allocation schemes only offering accommodation to homeless people at s75.

4. The Impacts and Processes of the Act

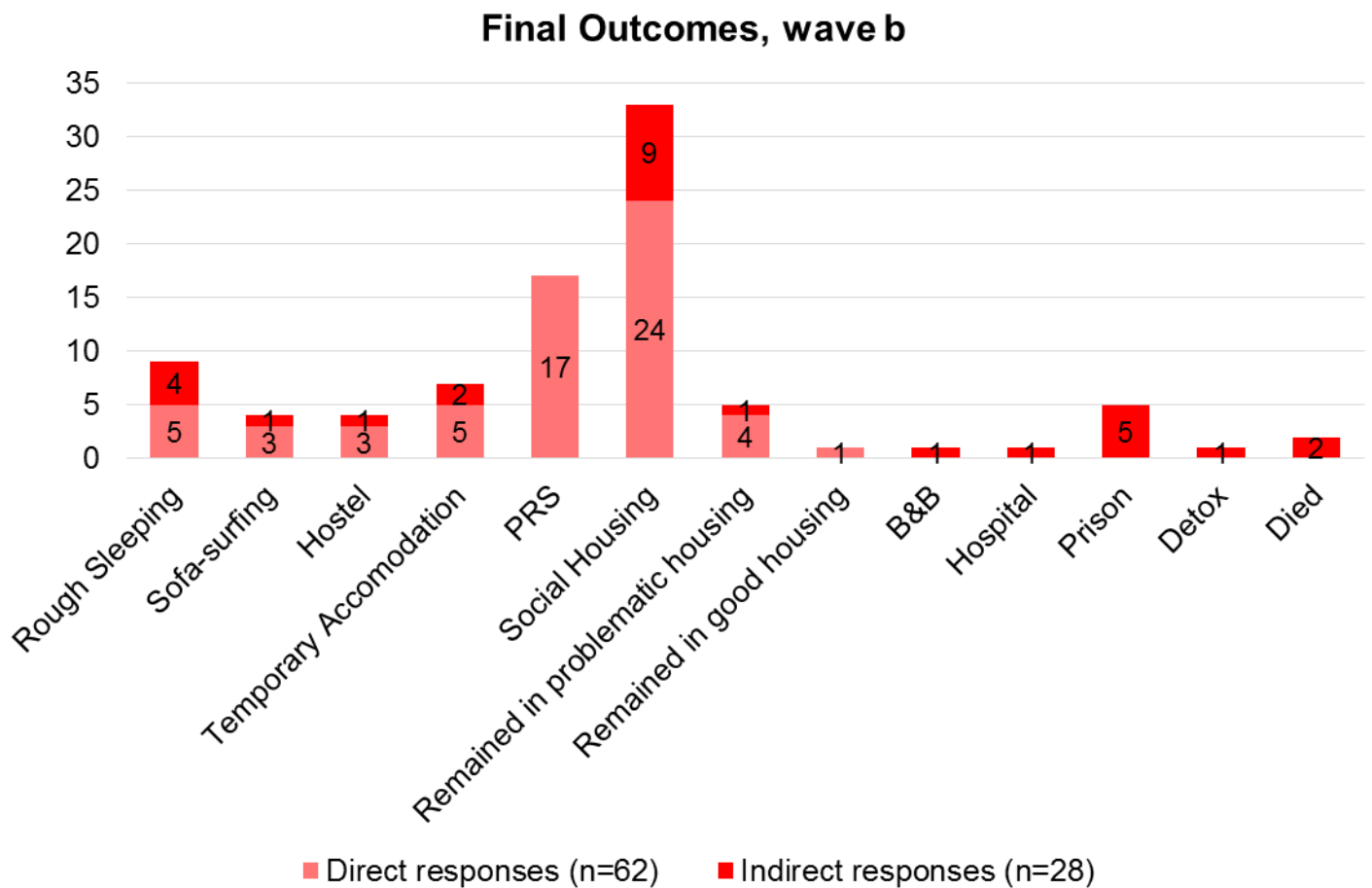
Introduction

- 4.1 This chapter presents the findings from interviews with service users, consultations with service providers representing the statutory sector, Registered Social Landlords (RSLs) and the third sector across six local authorities, and surveys with all 22 local authorities across Wales. The views and experiences of service providers and local authorities are presented in relation to processes and impacts of the Act, while findings from service users reveal personal experiences of the Act's provisions, both in terms of how they engaged with the process and the impact on their lives. It is important to note that service users were not always able to explain or convey full understanding of their housing trajectories, since they were not aware of the details of the legislation. Similarly they did not always understand their circumstances, for example, whether they were considered to be in priority need or deemed intentionally homeless; or if their homelessness had been prevented or relieved.
- 4.2 The chapter is structured as follows: first the housing outcomes for service users since the first wave of fieldwork are discussed; then, the following provisions of the Act are evaluated drawing from data across the local authority and service provider cohorts: Prevention; Reasonable Steps; Failing to Co-operate and Ending the Duty; Extending the duty to 56 days; Intentionality, Priority Need and Local Connection; Help to Secure; and Duty to Secure.

Housing outcomes for service users

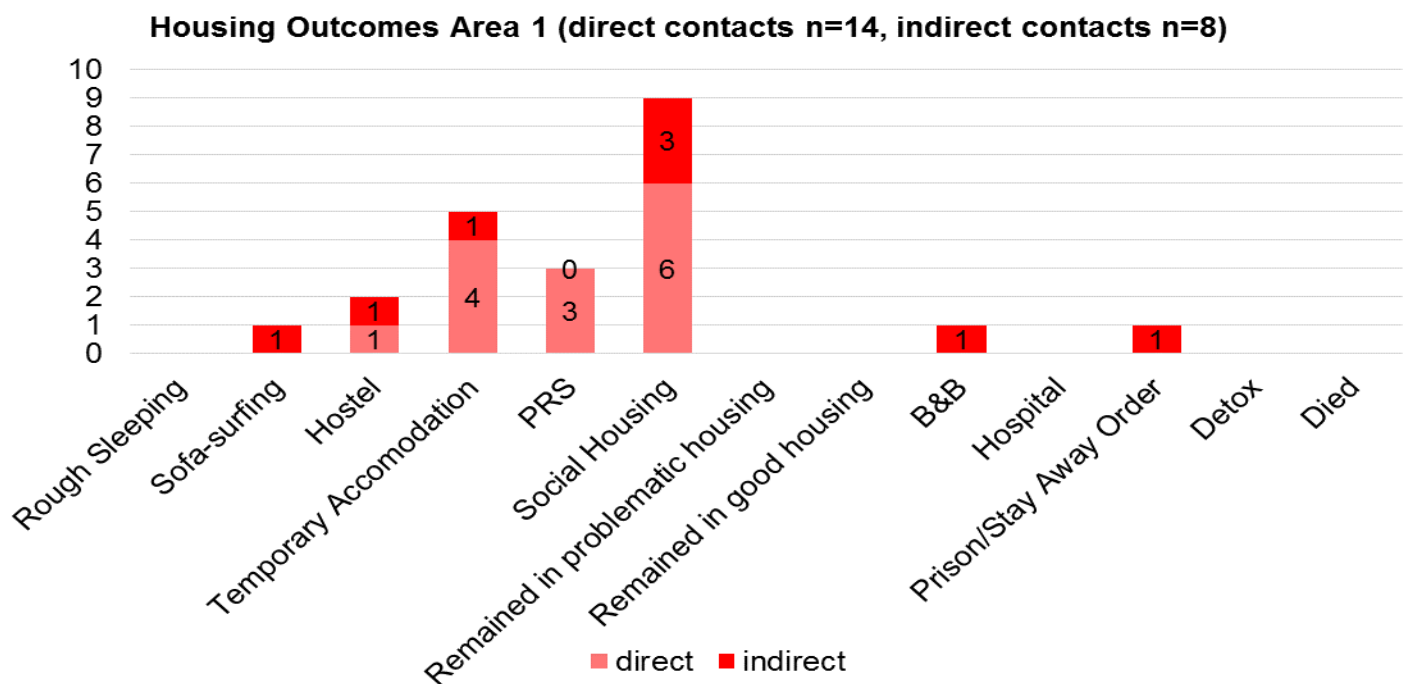
- 4.3 Of the 62 service users whose housing circumstances were verified directly through interview in the second wave interviews, by far the largest proportion had been placed in social housing (24 people). An additional nine people were reported as having moved into social housing by service providers/other contacts making the total 33. This represents just over half of those people whose housing circumstances could be confirmed in the second phase of the research. The second highest number (17 people) was those who found accommodation in the private rented sector. In total therefore, 50 out of 154 people had moved into stable accommodation. In total, the housing circumstances of 90 people were verified while the situation of 64 people was unknown.

Figure 4: Housing Outcomes

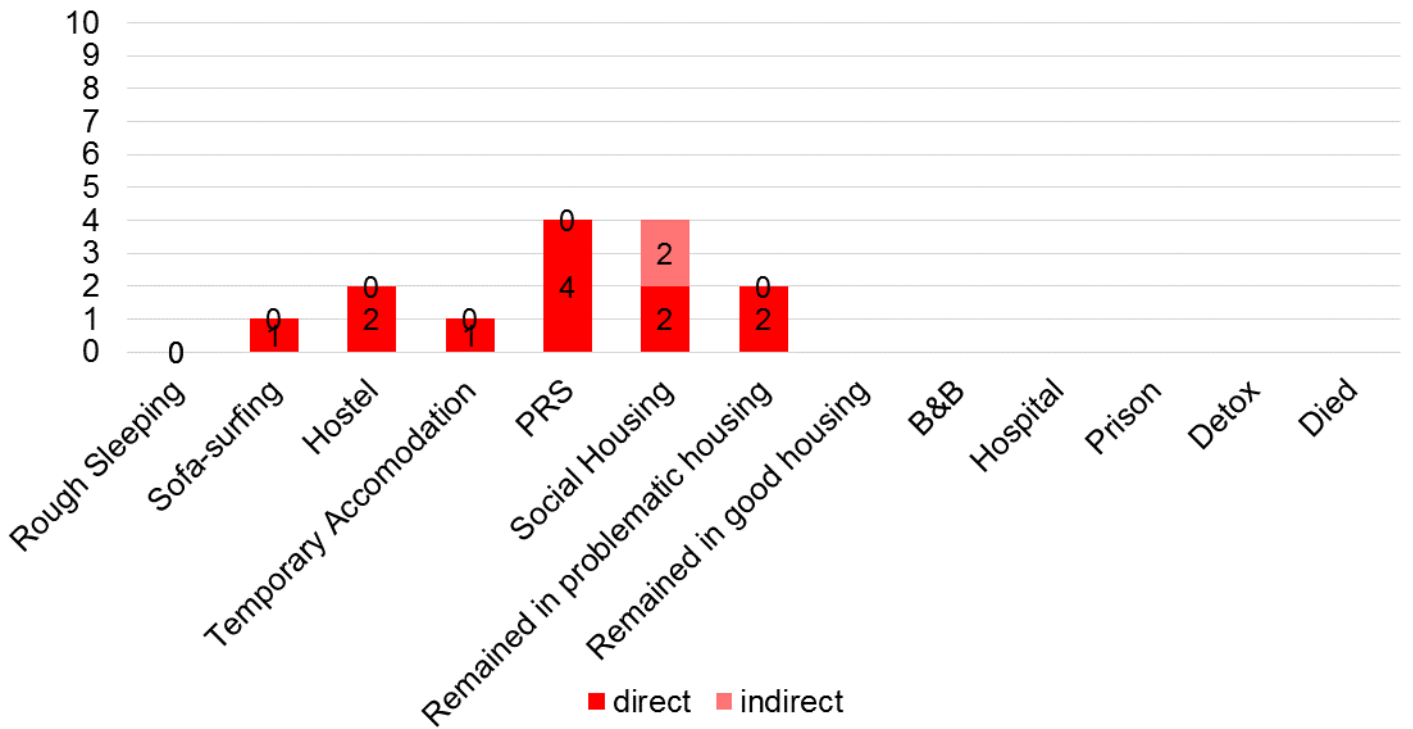


4.4 There were considerable variations among the six case study areas in terms of housing outcomes for service users. While the differences are explored in more depth below, Figures 5 through to 10 give an initial indication of outcomes by area.

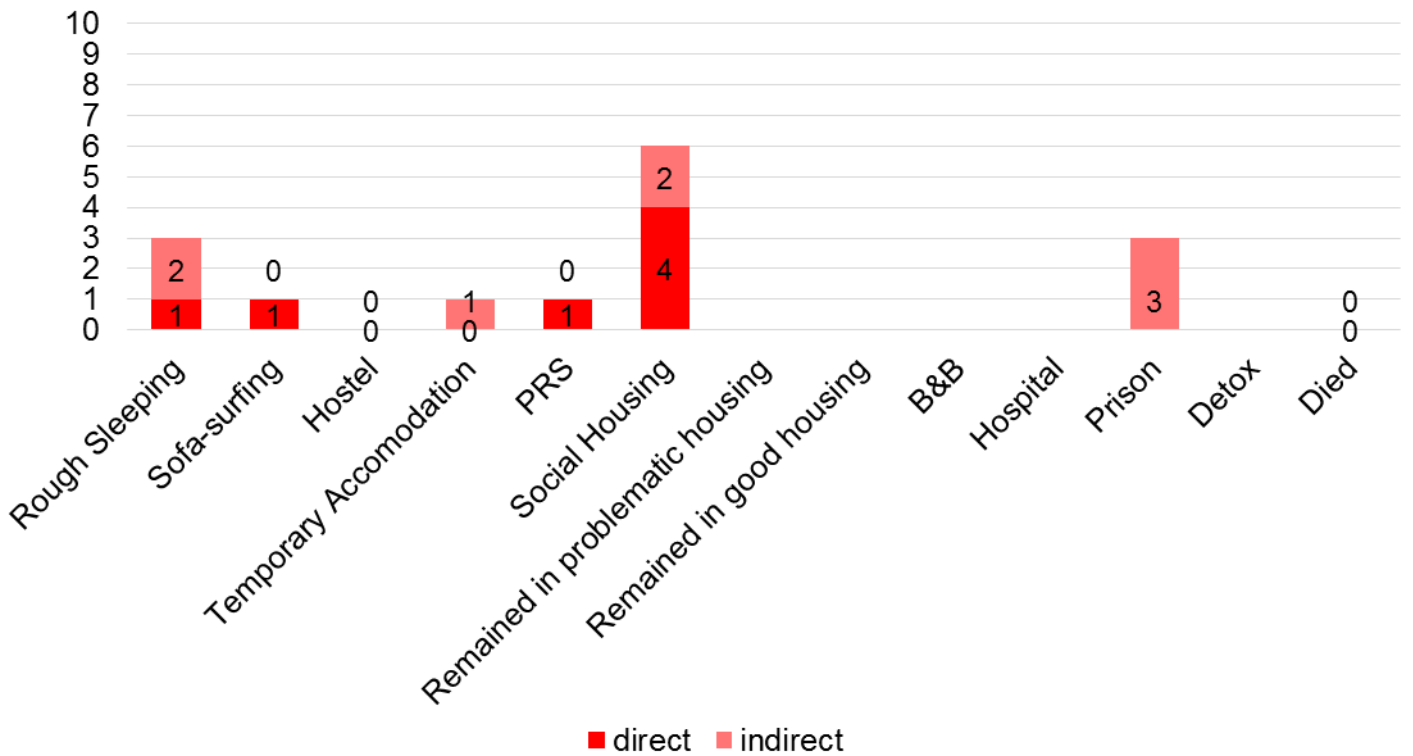
Figures 5 to 10: Housing outcomes by local authority area



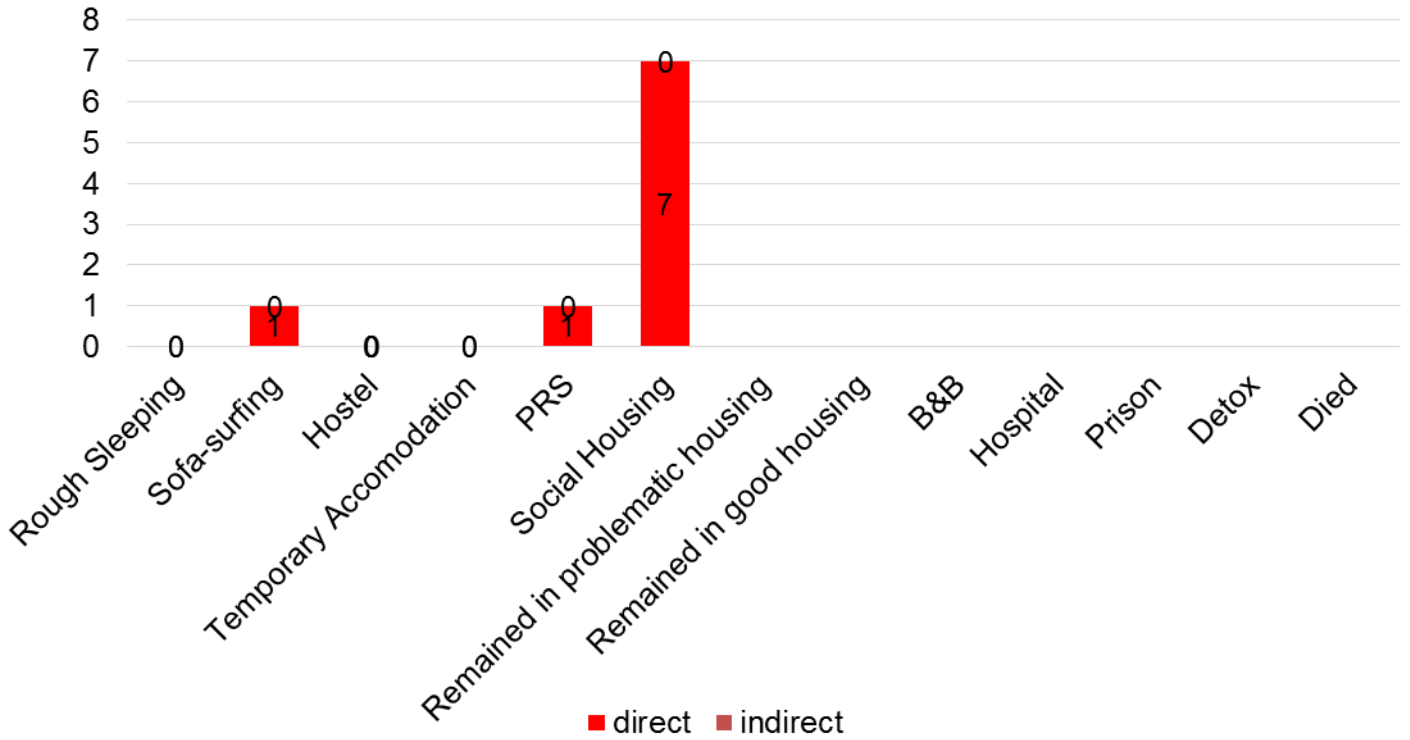
Housing Outcomes Area 2 (direct contacts n=12, indirect contacts n=2)



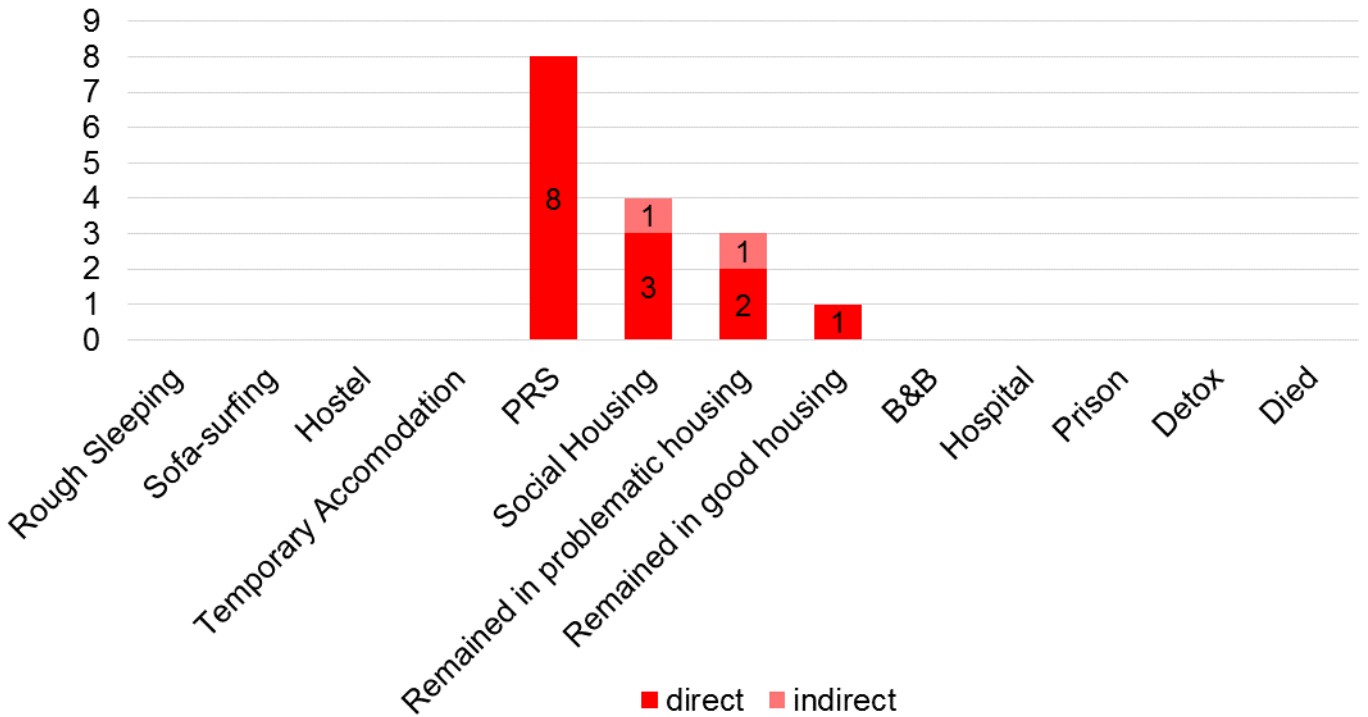
Housing Outcomes Area 3 (direct contacts n=7, indirect contacts n=8)

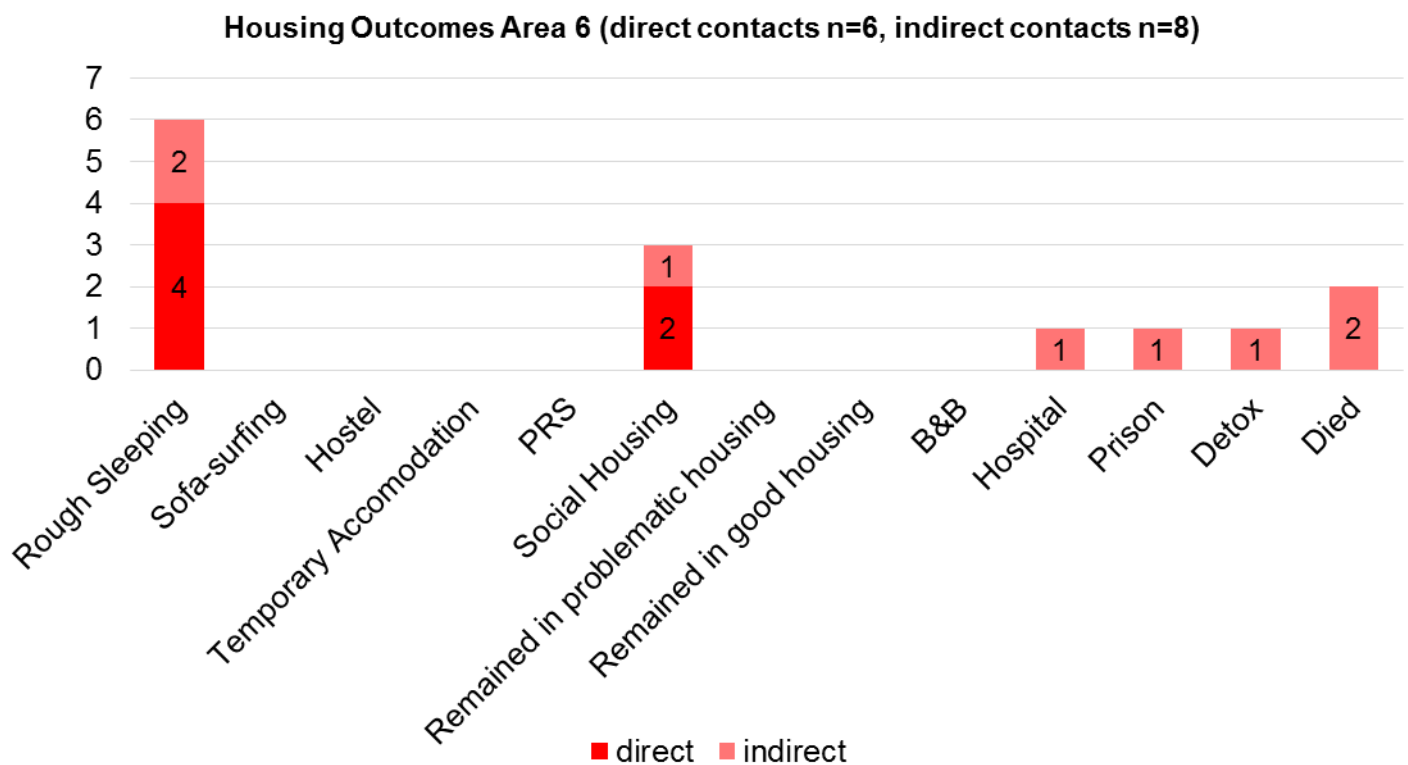


Housing Outcomes Area 4 (direct contacts n=9, indirect contacts n=0)



Housing Outcomes Area 5 (direct contacts n=14, indirect contacts n=2)





- 4.5 Across all of the case study areas, practically all service users could be described as being vulnerable in some way, experiencing a range of physical and mental health issues. Ten respondents had significant physical disabilities; 13 had severe mental health problems; six people had issues with substance and alcohol misuse. Only two service users were not affected significantly by these issues, and both of these had dependent children.
- 4.6 In the first wave of the fieldwork, the local authority was working to prevent homelessness in 31 cases, and to find housing for those already homeless in 98 cases. Twenty four service users had recently found housing, but those in the private rented sector still felt precarious and remained on the waiting lists for social housing. Of the 57 households re-interviewed, 11 had been facing homelessness, 32 had been homeless, and 13 had found housing at the time of the first interview in wave 1. One service user had been homeless due to a relationship breakdown, but returned to their partner after declining an offer of social housing.
- 4.7 The difference in service users' housing outcomes appeared to be dependent on a constellation of factors such as demand for and supply of social and privately rented housing, and the responsiveness of individual staff. For example, an elderly couple facing eviction from private rented accommodation were supported by a third sector organisation and rehoused by an RSL:

'They [third sector organisation] came round and they got hold of the housing association, they got hold of, or tried to get hold of, some private landlords and I couldn't get any joy with private landlords. The housing association, a week before I was being - or the sale was ending, it was five days actually, came up and gave me... the keys to this house' (SU, A4).

4.8 In area one, most service users had spent time in temporary accommodation prior to being settled in more permanent housing. For one person placed in the private rented sector, the local authority had used discretionary housing payments to cover the difference between housing benefit and the private sector rental charge. Another service user, who had been intermittently homeless for many years, received support from the local authority in the form of ongoing mediation between them and their private landlord:

'It's private rent and I think the council have ensured that worries that I've had about the landlord possibly turning round and ending a tenancy on a complaint or a misunderstanding or anything, I think the council have covered that for me' (A1)

4.9 However, in area two, while most service users reported significant pressure from the local authority to move into the private sector (and five people eventually did), none felt that they received any support from the local authority to do so. Two people remained in the accommodation they occupied in the first wave of the fieldwork and reported feeling trapped in overcrowded and precarious conditions.

4.10 The greatest incidence of rough sleeping was seen in areas three and six. In area three, 11 service users had spent time rough sleeping, primarily due to break-down in family relationships, before receiving support from the local authority or a hostel place. Only one person interviewed reported receiving support from the local authority to move into the private rented sector. For area six, there also appeared to be a high incidence of individuals who moved between different forms of temporary accommodation and spent time rough sleeping. In this area, only one service user (part of a couple) was offered social housing following the repossession of their private sector accommodation.

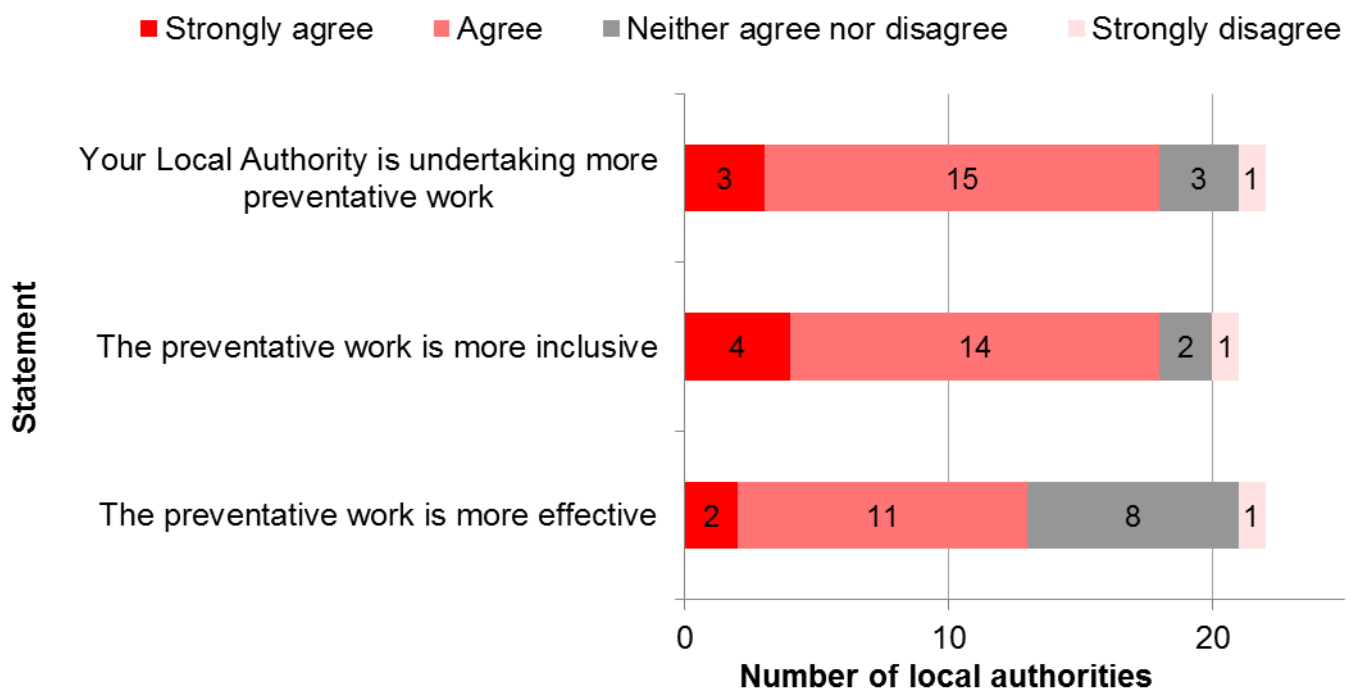
4.11 In area five, 11 people were rehoused into private rented or social housing, and two people received help with a rental deposit. For example, one young couple expecting a baby were able to move from shared accommodation to a new home when the tenancy ended:

'They paid for the bond on the house, for the deposit...it's secure, it's in a nice neighbourhood. It's close to family' (SU, A5).

Attitudes towards prevention

- 4.12 The Act has fundamentally changed the way that Housing Solutions Teams work with people who are homeless/threatened with homelessness (Shelter Cymru, 2015). Prevention denotes any interventions which avoid homelessness, although this can oversimplify the complexity and range of activities undertaken (Mackie, 2015). Previously outside of the legislation, prevention is now at the core of the Act, and there is now increased flexibility in how local authorities can intervene to address the causes of homelessness. However evidence to date suggests that there is significant variation in approaches within and between authorities (Shelter Cymru, 2016; Welsh Audit Office, 2018).
- 4.13 The findings from the local authority survey demonstrate - as can be seen in the chart below - that a clear majority felt that their local authority was undertaking more preventative work, that this is more inclusive and effective. A smaller majority reported that the preventative work undertaken is more effective.

Figure 11: Views on preventative work (N=22)



- 4.14 It was noted by local authority service providers that a fundamental strength of the Act was that *'everybody has to have an assessment if they come in and they are threatened'* (LA, A2) and that local authorities are *'under a duty to assist more people, so that benefits the public'* (LA, A3). The prevention agenda was thought to be working for many people, and certainly more people were eligible for support than under the previous legislation.

4.15 The overwhelming majority of service providers from local authorities, RSLs and the third sector welcomed the emphasis on prevention. As one person noted *'I think the shift towards prevention, early intervention is really positive'* (LA, A3). Another local authority service provider described prevention as *'a big strength for us. It helps us a lot'* (LA, A3). A further service provider articulated the benefits of a preventative approach which was no longer about gatekeeping access to services. This was felt to be in contrast to the previous framework in which everyday practices (such as decision-making) were rooted in the duty/no duty dichotomy:

'Obviously you're trying your utmost for that person, and it's more about the prevention. It's taking it away from just making a decision about have you got a duty or not. It's more about the prevention, and getting the right results, so I think that's been positive.'
(LA, A1)

4.16 However, some service providers reported that there had been no significant changes since the introduction of the Act as prevention work was already being undertaken within their local authority. This fits with findings from the previous phase of the research where RSLs and Supporting People reported that prevention was already embedded in their agendas and practice. One RSL service provider illustrated this stating that *'in terms of our role, obviously, we haven't seen a huge change, because a lot of the stuff we were doing anyway'* (RSL, A3).

4.17 Another local authority service provider commented that although prevention work was already being undertaken, the balance of responsibility between themselves and service users had changed:

'We already did quite a lot of prevention work. We put the onus quite a lot on the individuals now to try and find a solution to their problems. We're trying not to be the council that sorts everything out for them and that's quite challenging.' (LA, A2)

4.18 Service providers across the statutory, RSL and third sectors felt that some prevention work already undertaken was not being effectively captured or properly recognised: *'there's a lot of prevention work which is going on which isn't being captured anywhere'*. (LA, A3). This was reinforced by an RSL Head of Services, who emphasised the important role that RSLs have historically played in tenancy sustainability and prevention although this was not always recognised:

'I think it's important that RSLs are recognised for the contribution they do make for the prevention agenda, and also the fact they are very pro-active when issues arise and you can see that tenancies are failing.' (RSL, A3)

Provision of prevention services by local authorities

4.19 In the local authority survey, responses indicated that a range of preventative services are offered across the local authorities, as can be seen in the figure below. There is a relatively even mix of services which are provided directly by local authorities and those that are provided by other organisations. Services that are most likely to be offered in-house are information and advice; negotiation with private/social landlords; payments by way of grant or loan; programmes to increase availability of affordable accommodation; and guarantees that payments will be made. The types of preventative activities that have been most frequently reported as having increased in the last year are support in managing debt, mortgage arrears or rent arrears; negotiation with private/social landlords; information and advice; and payments by way of grant or loan. With the exception of support in managing debt, mortgage arrears or rent arrears, these are mostly services that are provided in-house.

Figure 12: Provision of prevention services (N=22)

For each of the services listed below, to help prevent an applicant from becoming homeless under s66 of the Act, please indicate whether this is via Local Authority provision or non-Local Authority provision

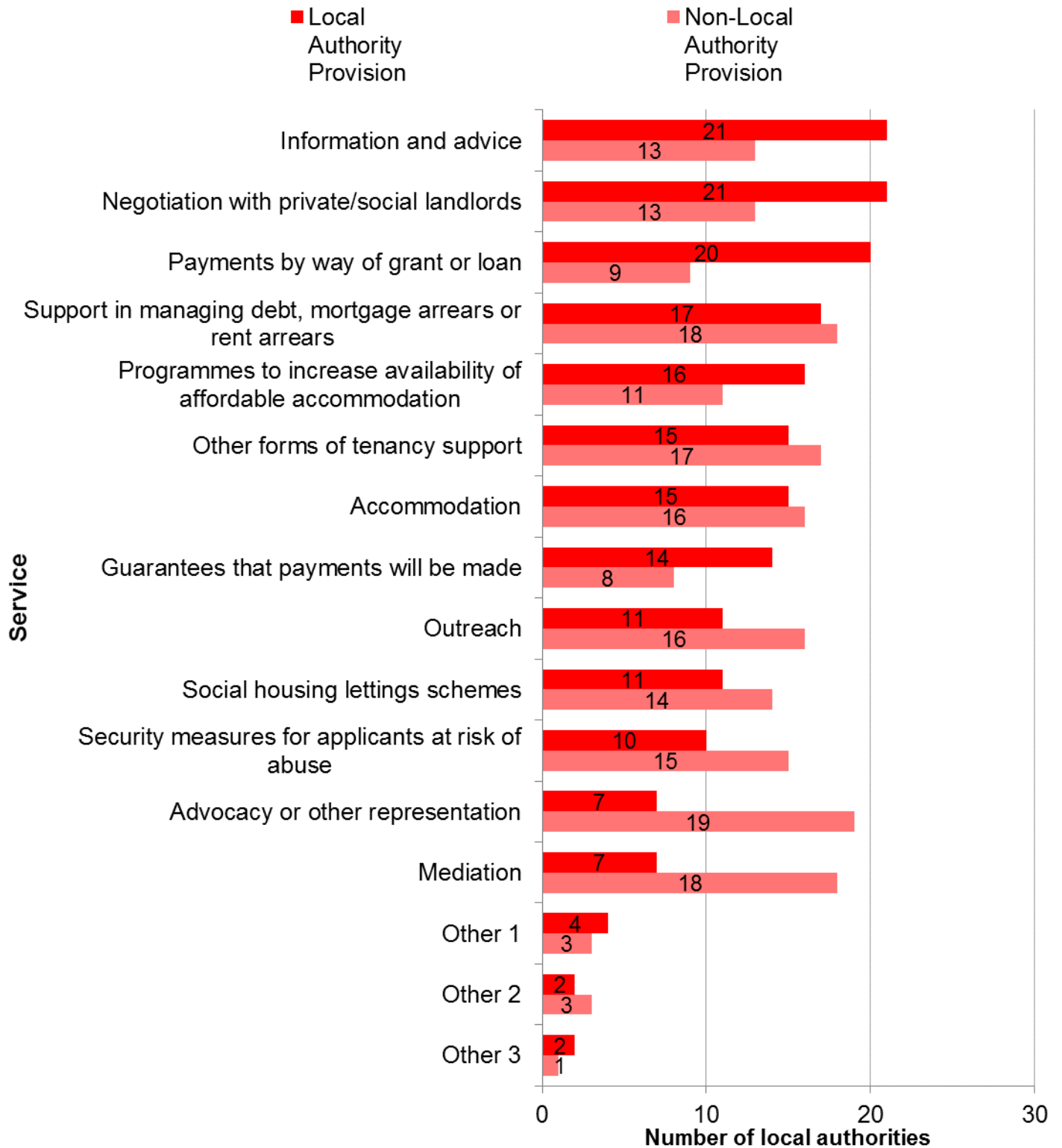
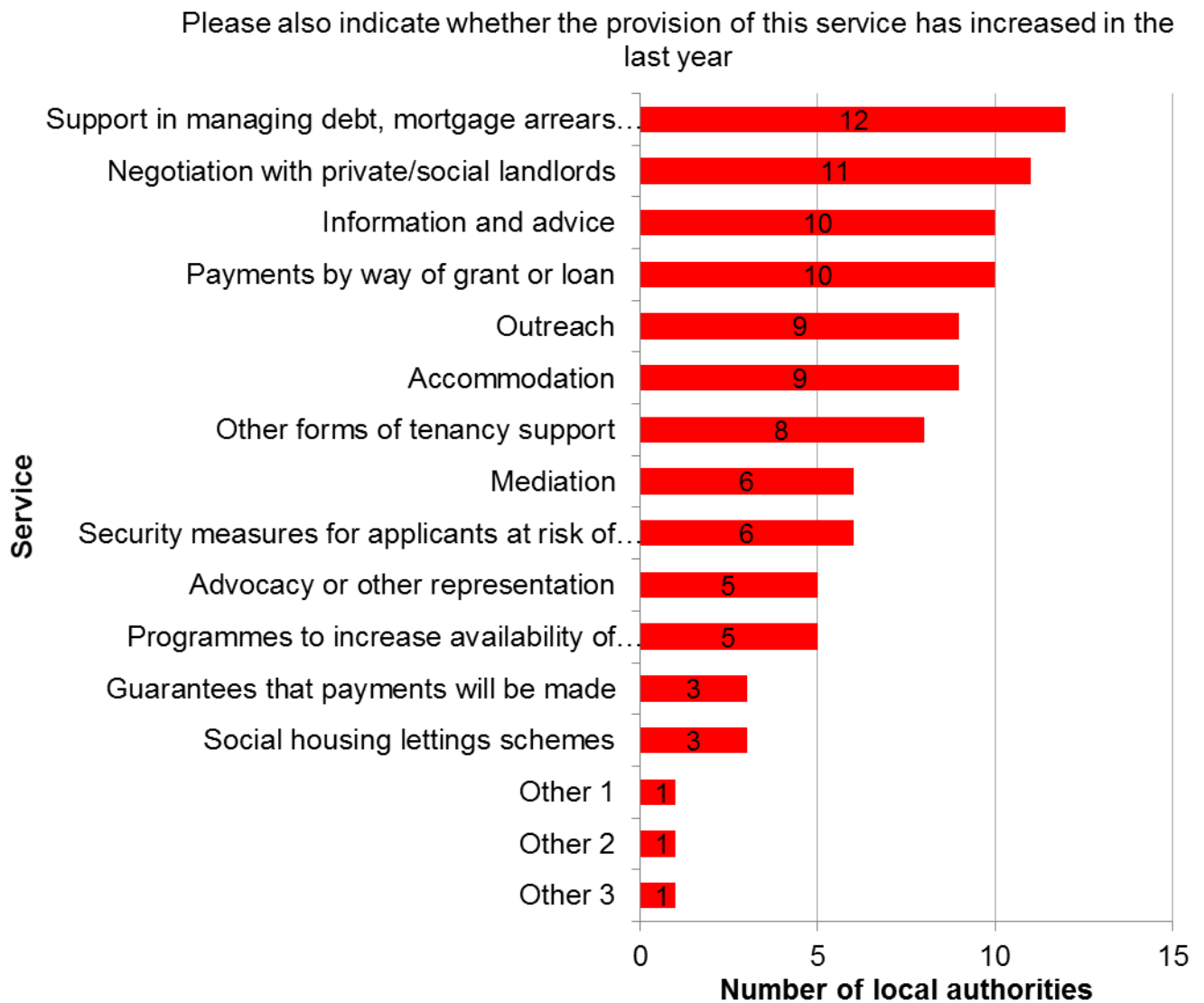


Figure 13: Increase in provision of prevention services in the last year (N=22)



4.20 Congruent with the responses from the local authorities, service providers identified specific prevention activities that they routinely engaged in as follows:

- Budgeting and managing debt.
- Rent arrears and rent deposits/bonds.
- Welfare benefits advice and reviews.
- Housing advice.
- Signposting to Housing Solution.
- Referral to floating support workers.
- Referral to pre-tenancy workers.
- Mediation with landlords (particularly in the private rented sector).
- Mediation with members of informal networks (family and friends).

- 4.21 These activities can be broadly categorised in terms of the following:
- General advice and assistance;
 - financial advice and support;
 - and, signposting to other support agencies.
- 4.22 While nine service users across the local authority areas reported they had been promised financial support in the form of a deposit and first month's rent when moving into private rented accommodation, only three people actually received this. Five service users were supported by the local authority with furniture once they had received an offer of accommodation
- 4.23 Prevention was described in myriad ways by service providers and often in terms of a creative approach to problem-solving: *'whatever problem we've got, we'll see if there's a way around it'* (LA, A1). In addition to the proactive, problem-solving philosophy considered to be embedded within the prevention duty. Another described it as promoting *'a holistic approach'* (LA, A1).
- 4.24 Rather than describing interventions under the umbrella of prevention, some service providers contextualised prevention in relation to outcomes, and in this case as avoiding evictions, finding temporary accommodation and long-term housing solutions:
- 'People ... presenting as homeless and having been evicted from places and it doesn't happen so much these days. I think they're much more of an effort to prevent people becoming homeless from their own accommodation, you know.'* (LA, A1)
- 4.25 However, several RSL service providers reported a potential conflict between competing agendas. For example, prevention could sometimes be at odds with wider community sustainability issues. The following comments by one service provider illustrates how this balance is achieved and how avoiding eviction is paramount in preventing homelessness, yet this needs to be balanced with the interests of other residents and the wider neighbourhood:
- '[Prevention] for us, it's just really the conflict of maintaining the tenancy, managing tenancies - and really, at the end of the day, we are a social landlord; we're not here to see people being made homeless; we are here to accommodate homeless people as well as everybody else that's on the register - but we do have a duty to our tenants, we have a duty to the community. When it comes to eviction cases, it is really the last point'* (RSL, A1)

4.26 The use of mediation as a form of prevention was mentioned by a number of service providers and was identified as a key intervention which would help to manage a range of issues which arose with landlords (particularly those in the private rented sector):

'[From] mediating between tenants, landlord, trying to save [a tenancy] ...Anti-social behaviour issues, or condition of properties, we'll step in.' (LA, A1)

4.27 Another local authority service provider described mediating with other statutory agencies as well as with other local authority departments:

'Somebody's gone into prison, we'll link-in with the prison, with the tenant, to see if it's saveable, see if they meet the 13 weeks' housing benefit. If not, we'll see if it's viable if we can pay, and if it's maintainable.' (LA, A1)

4.28 The other key area of support provided by local authorities was maximising the benefits to which service users were entitled. Areas one and five seemed to have made this a priority, with five service users across these areas indicating that they had received this form of prevention support. In the words of one service user who was caring for a disabled son:

'When you get housing benefit, you're only allowed £400 per month and places are going between £500 and £600 a month, and they said well if you put [your son] on the list, he gets half, you get half, so that pushed it up so now we can get this one. This is £520 but we could actually go higher if we needed, but we don't need to... The person from the council who explained it, he was talking about it. Then you've got your rent arrears, so liaising with housing benefits, landlords again, addressing any issues there... Again, with mortgage arrears, trying to see if any family, friends, any mortgage rescue schemes available.' (SU, A1)

4.29 Signposting and referrals to relevant services were highlighted by service providers as an important preventative measure in relation to optimising welfare benefits:

'We have now an in-house welfare team as well. ...We refer them, don't we? To the welfare team, and then they might do a benefit enhancement. I think all housing officers know what benefits are available, but they haven't necessarily got the time to be able to do the individual cases. That's what works really nicely; it's a holistic approach towards financial management.' (RSL, A1)

4.30 The role of floating support was clearly concomitant with prevention and across the case study sites there was variation in the way in which this was contracted and organised. Subsequently, there were mixed views from service providers on the ways in which

floating support worked well within the prevention agenda. Where floating support worked less well, it appeared to be linked to the way in which it was managed or contracted rather than the actual quality of service provision.

- 4.31 Some service providers raised the issue of the impact of increasing demands for tenancy support, and the increased pressure on support staff:

'With our support workers, when someone moves out, if they feel that person needs tenancy support they would have previously referred to tenancy support. Whereas now it's quite difficult to get someone involved. That means our support workers are then supporting people who have moved on. As soon as someone moves out, someone moves in. Their case-load has increased because they're supporting the new person and the person who's moved out, yes.' (TS, A2)

- 4.32 From a service user perspective, the most appreciated form of support appeared to be regular visits and tenancy support following being rehoused. Four people reported receiving this type of support from local authorities, and eleven were receiving it from either RSLs or the third sector. One service user stated:

'With [third sector organisation], I don't think they could have done any more. They worked very, very well. They've still kept in contact. What was it? It was about a month ago the girl knocked on the door, 'How are you going?' Is everything okay? Do you want me to help you with anything?' and I says, 'I'm okay.' She sat down, half hour, well, yes, something like that and off she went, and, well, I expect I'll see her again in another few weeks' time.' (SU, A4)

- 4.33 However, the time limited nature of floating support was raised by some service providers as potentially jeopardising prevention:

'[One} client clearly has low levels of learning difficulties. There's other things going on. She's got a child with ADHD. There's a lot of stuff going on with that person. Essentially, with support, she manages. She ended up running up arrears again in temporary accommodation, that I manage. My worker worked with her, she set up a budgeting plan. I'm pretty sure it will happen again to her. She's [young], but the point is that person is probably going to need lifelong low-level support to manage her tenancy. Why aren't we looking at that?' (TS, A2)

Reasonable steps

4.34 The Act placed a new duty on local authorities to carry out reasonable steps to prevent and relieve homelessness. In general, the notion of reasonable steps was thought by service providers to have brought positive changes to policy and practice and it was described in various ways as enabling *'more streamlined'* and *'holistic'* support, and subsequently leading to *'exhaustive'* actions to prevent homelessness. Primarily, taking reasonable steps was thought to constitute a range of activities which prevented homelessness, and these should be tailored to each individual. Transparent regular communication with service users; being clear about rights and responsibilities and being person-centred were thought to be key in underpinning reasonable steps to prevent homelessness.

4.35 Service providers highlighted the link between reasonable steps and person-centred practice, *'well, the reasonable steps is reasonable to the individual, isn't it?'* (LA, A2). Another local authority service provider discussed the way in which reasonable steps could be implemented creatively whilst still being *'person-driven'*, and there were numerous positive examples given across the case study areas of where service providers were demonstrating creative approaches to taking reasonable steps as the following interview excerpts illustrate:

'Well, the reasonable steps there would be whether you've tried to visit, they've had letters, phone calls, and anything you've done within the service, the tenancy support, yes, referrals to CAB and so on. What we would've done within those services to try and get the tenants to work with us and engage.' (LA, A1)

'I tend to do the assessment and get all the information and then use the rest of the day to make investigations. If they are homeless make a decision and then put reasonable steps in; what I will do for the applicant and what they need to do for themselves. So, it's just making sure that they get all the support they need, they can access all the benefits they're entitled to, they know where they can go for temporary accommodation.' (LA, A3)

'Undertaking mediation or going through somebody's debts or budgeting issues. Say if there was a notice for rent arrears, arranging with the landlord a repayment plan, engaging with floating support, that sort of thing would be a reasonable step.' (LA, A4)

4.36 However, some third sector and RSL service providers still felt that not every local authority had fully implemented reasonable steps, or had offered a person-centred service, and feared a *'tick box'* mentality sometimes persisted:

'I think some things maybe could be a little bit more creative. I can't give you exact examples but there can be the mentality to have a tick box can't there?' (TS, A4)

4.37 When the Act was first implemented local authority service providers reported some confusion regarding the interpretation of 'reasonable'. In the words of one local authority service providers, *'I don't think it was easy for staff at the beginning, was it, deciding what reasonable steps were. How reasonable is reasonable?'* (LA, A1).

4.38 Yet, some service providers still felt that what could be considered 'reasonable' continued to be subject to interpretation:

'How far do you go? How many offers of houses do you have to give them? If it's suitable, it's suitable and you think, well it's reasonable, I've found you somewhere affordable, it's the size of property you want, maybe not quite where you wanted it but we think that's reasonable, it's suitable so, you know and they say, 'Well no I don't want that.'' (LA, A1)

4.39 Other service providers indicated that even when service users followed the steps set out for them, this did not guarantee a positive outcome:

4.40 *'[The service user said] I rang everyone on the list, I went into every estate agent, I couldn't get anywhere, here I am'* (TS, A2). Other service providers reported that reasonable steps are not always sensitively implemented by all stakeholders and some felt that reasonable steps were not in fact reasonable, since there were challenges facing service users:

'Half of my clients, some of them can't read, some of them have so many bailiff letters coming they don't open the mail. Go there, knock; people aren't willing to try.' (LA, A1)

'What I've seen so far, the reasonable steps has been you will contact a letting agent, here's a list of landlords, that list is out-of-date and not reasonable if you think the clientele that we see, they're not going to be able to afford to go to this roads full of letting agents, they can't go there and pay £95 to be told they haven't got a very good credit, which they already know! They don't need to pay somebody £95 to be told that, and realistically they need about £1,000 upfront to be able to pay deposits, month's rent in advance, that's not going to happen.' (TS, A6)

4.41 A standardised approach towards people with additional vulnerabilities was seen as problematic by many service providers across the sectors and case study areas, making it more challenging for them to engage with the process. Service providers indicated a need for reasonable steps to be considered on both an individual basis and in terms of

geographical context. The scope and nature of local resources was highlighted as key by one local authority participant who noted that:

'You've got to look at what's prevailing in your own particular area. Something that's not reasonable here may be reasonable somewhere else?' (LA, A1)

4.42 The balance of responsibility in taking reasonable steps in terms of the service user, Housing Solutions and other stakeholders was discussed on many occasions during the service provider consultation. This is also discussed in the chapter focusing on person centred practice. Some providers felt that 'reasonable steps' gave service users more 'control' in the provider/user relationship and, as such, it was useful.

4.43 Some service providers saw the introduction of reasonable steps as having further benefits for service users as it made them as providers more accountable. However, others considered that the actions taken under reasonable steps were primarily the responsibility of the service user as *'the ultimate responsibility lies with the client'* (TS, A2)

4.44 Additionally, the ways in which reasonable steps was sometimes implemented was thought by some service providers to conflict with the person-centred ethos of the Act. One third sector service provider noted:

'The reasonable steps gives the authority more tools to end that duty. That's what it seems, it's more used for the intentionality.' (TS, A2)

4.45 Failing to cooperate with reasonable steps was considered to be 'vague' by many service providers and some noted the difficulty of enforcing this when working with vulnerable service users:

'When you're dealing with very vulnerable clients, I'm not sure that you're sure about whether they're not cooperating or they just don't know what to do. You can try, and they do, the staff try really hard to explain to people what's going to happen and what they need to do and what we'll do and everything else and we've produced the housing, personal housing plan and all the rest of it but some of our clients we're never going to be able to do that.' (LA, A5)

4.46 In this instance, it was apparent that there was a perceived disparity in terms of the new duty and perceptions of whether service users had failed to engage with reasonable steps. The capability of service users with complex needs and entrenched problems is a complex issue which is also concerned with differing expectations and definitions of 'reasonable'. It also raises some tensions in relation to the person-centred philosophy embedded within the Act. Service providers in the main felt that reasonable steps was

weighted in favour of the local authority rather than service users. The onus is on the client and there is an assumption of agency and capacity, which raises significant issues for people with vulnerabilities.

Failing to co-operate and ending the duty

4.47 Drawing on data from the local authority survey, 21 local authorities stated that they take steps to maintain contact with households who miss an appointment or who fail to follow up with requested information. However, one stated that they did not. This question was added to the second wave survey, and so it is not possible to measure the degree of change in the last year. Even the local authority that reportedly does not take steps to maintain contact commented that they *'write, text or call'*. All of the other 21 local authorities referred to emails, texts and phone calls and/or letters. At the more comprehensive end, one authority commented that:

'Intensive case management when capacity allows means regular reviews are completed. Also those clients in B&B and Temporary Accommodation have [a] dedicated officer who supports them to manage their placements/accommodation and chase up with [the] intention of speeding up [the] move on process and ensuring PHP actions for customers are fulfilled.'

4.48 Three respondents to the local authority survey referred to third parties, including *'known support services they engage with'*. However, limits were acknowledged in four responses in terms of acknowledging non-response, and two local authorities indicated that they close cases after non-response (two attempts or seven days). One local authority stated that

'We will take steps to make contact with households, but not to those who miss an initial appointment or haven't been assessed by us'.

4.49 Considerable efforts were reported in relation to helping people co-operate. For all local authorities, the process of how they determine that a household has refused to co-operate involved multiple attempts to contact the household, although it took different forms. At the most basic level, five local authorities adjudged there to be refusal to cooperate after the household repeatedly failed to respond to communications. For example:

'Face to face interview, letter follow up letter, then if no contact... letter to advice non-cooperation'.

4.50 For six local authorities, this involved deliberately not engaging with a Personal Housing Plan. For example:

'Failure to co-operate is where we have been in contact with [a] person [and] agreed actions as part of a Personal Housing Plan but they are then refusing to engage with that plan'.

4.51 Five authorities discussed how they considered what is reasonable and took into account people's vulnerabilities. For example:

'When looking to close a case officers complete a 'case closure checklist' which evidences what efforts made to support [a] client to engage and we factor in additional vulnerabilities or issues that may mean engagement is more challenging for specific customers'.

Extending the duty from 28 to 56 days

4.52 The Act expanded the definition of being threatened with homelessness so people can now receive assistance if they are within 56 – instead of 28 – days of losing their home²⁴.

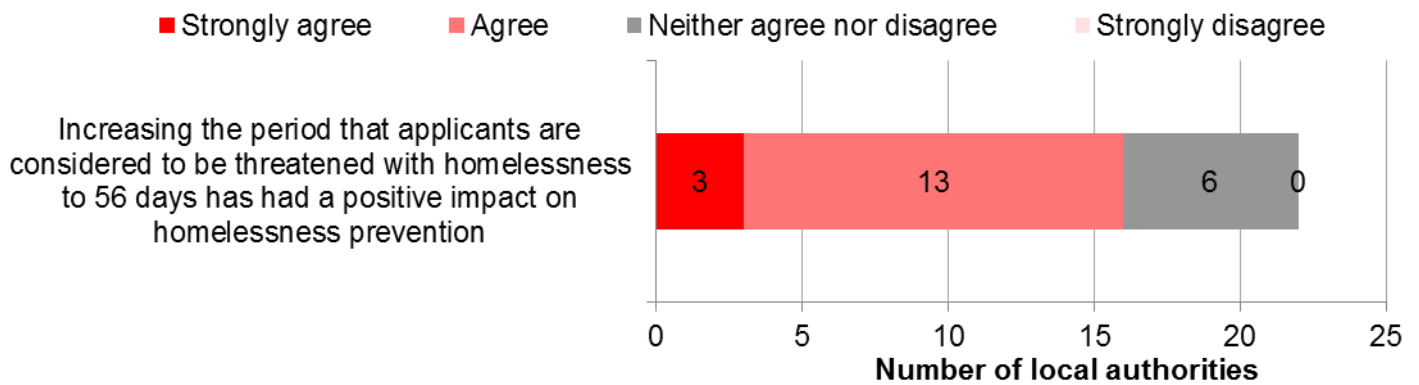
4.53 Local authority survey responses indicate that early preventative work continues to grow in a number of authorities. Ten local authorities reported a change during the last year in how they respond to people who are at risk of homelessness in more than 56 days. Nine of these local authorities referred to more preventative work. One local authority reported more help for clients in hospital and prison, and one reported working with landlords more, with landlords referring their current tenants *'in the hope early advice can maintain tenancies'*. One of the local authorities reported prioritising support and assistance to those at risk within 56 days *'due to the increase in workload'*. Two respondents to the local authority survey felt that the preventative work does not always have a positive outcome:

'More emphasis on prevention however some cases cannot be prevented i.e. Notices from landlords who wish to sell their properties'.

'We aim to prevent homelessness. Our caseload is so high though that we find mostly we are firefighting relief cases'.

²⁴ The old 28 day prevention duty only applied to those who were priority need.

Figure 14: Extending the Duty to 56 days



4.54 The extended timescale of 56 days introduced in Section 73 of the Act was considered to be a strength by service providers across all case study areas and sectors, offering them the time to be more flexible and find solutions to the threat of homelessness: *‘it gives us more chance to prevent, so the more time we have is always a positive, I think’* (LA, A1). Others agreed:

‘If you tell me, you know, actually if you’ve received a notice, you can present 56 days prior to that and someone will help you and hopefully find you temporary accommodation before you and your family are in a homeless situation, so that’s only good.’ (TS, A2)

4.55 As well as a person-centred approach, the 56-day period was thought to enable a more informed assessment and outcome as it enabled a different model of practice:

‘So sometimes you don’t fully get an idea of someone’s support needs until they actually go through the services because not everyone will fully open up in their assessment, so you won’t have a full picture of what their presenting needs are in that interview, you just want to ...try and get accommodation. It’s only then in the weeks after... that you start seeing actually those core reasons, what’s led to them [to the hostel]’. (TS, A2)

4.56 Furthermore, service providers reported that having a longer period of time to work with service users enabled the identification of these ‘core reasons’ and provided sufficient opportunity to either put an action plan in place, or at least to begin to do so. There was consensus about this as the 56-day period was seen to enable officers to mediate in a meaningful way on behalf of service users, but also in offering landlords reassurance that actions were being taken:

4.57 However, in spite of extending the time when people are considered to be at risk of homelessness to 56 days people still presented when in crisis – that is, when they are actually homeless:

'It's just that we tend to get a lot more presentations where the 73 duty is accepted as opposed to a 66, so they're not coming in early enough, but as to try and prevent it they all seem to be coming in at that point where they are absolutely homeless and, 'I'm being evicted tomorrow', type of thing. It's like, oh God, we haven't got a lot of time!'
(LA, A3)

Intentionality, priority need and local connection

- 4.58 The Act broadened the remit of people who are homeless/threatened with homelessness and in the first stage intentionally, priority need and local connection are disregarded.
- 4.59 Four respondents to the local authority survey stated that they have disregarded intentionality for any of the purposes of s75 for a specific priority need group, and 18 stated that they have not. Interestingly, this is one less than in the first wave survey, which suggests that one authority may no longer disregard intentionality. All four of those that have disregarded intentionality said that it was in the case of 16-17 year olds, with one authority adding that they have *'noticed very little impact'*. One authority also included care leavers, and a further authority included households with children.
- 4.60 Three local authorities stated that they have made changes to their original position on intentionality since July 2015, and 19 stated that they have not. This is an increase from the first wave survey, when no local authorities had changed their position. Those that have made changes stated that *'it is rarely used'*, reviewed annually, and *'no one presenting with DV [domestic violence] is deemed to be intentionally homeless'*. Of those that have not made changes, five explained their decision in terms of intentionality only being used as a last resort and for a low number of households. For example:
- 'We don't make high numbers of intentionality decisions. We do use this as a way of negotiating with a person for them to engage and work with us'.*
- 4.61 In one local authority reporting no change, they reported disregarding intentionality as *'each household is assessed and assistance is given irrespective of intentionality.'* For one LA, their position *'remains under review'*, although another stated that they *'have no plans to disregard intentionality'*. Three local authorities indicated that they had reviewed their approach to intentionality without making changes, although one reported remaining open to progressing a piece of work around intentionality with Shelter.

4.62 It was noted by local authority service providers that with the introduction of the Act the use of intentionality was at the discretion of each local authority:

'I know each local authority had to make the decision whether they were going to use it or not, and I think they all did in the end. There's no direction from above as to what we do with that. It's down to the individual case officer to decide based on the information that we get back from each case.' (LA, A3)

4.63 Among local authority service providers, it appeared that discretion and variable interpretation of intentionality was significant. Intentionality was seen as 'useful', by some, and that getting rid of intentionality altogether would be 'naïve' in particular cases; for example, where people do not pay their rent. However, several contrasted the use of intentionality with the person-centred ethos of the Act:

'Person-centred, prevention, all the way... For me, I'll talk to somebody, and I'll gather information. I'm like, chances are, he's going to be intentionally homeless, so my s.73, I'll max it out ... That guy still needs somewhere to live...but my intention isn't to give that intentionality. I want to rehouse before I get to that.' (LA, A1)

4.64 In this quote, the local authority service provider described how to avoid reaching an intentionality decision, demonstrating the person-centred ethos of the Act and the ability to work flexibly within the system.

4.65 Indeed, intentionality was subject to different interpretations between Housing Solutions staff in the same local authority as the following excerpt illustrates:

'Even if they are intentional then I still work with them until - carry out doing home visits or, just keep working with them regardless (of the 56 day rule) - until they're housed suitably.' (LA, A3)

4.66 However, among some local authority providers there was evidence of a continuation of the ethos of the previous system – a gatekeeping approach and finding reasons not to assist:

'[...] we can't offer every client a duty; we haven't got the properties to offer duties to everybody, and it means that we are giving the people who've got the highest priority any sort of property or duty first. Sometimes it is hard to find intentionality, but it's just something you have to scour through.' (LA, A3)

4.67 Some considered intentionality to a necessary clause:

'If we didn't find them intentional, what would the solution be?' (LA, A3)

4.68 There was evidence therefore, of some local authority service providers absolving themselves of responsibility and using intentionality as a way to manage scarce resources, which is not in the spirit of the Act.

4.69 Some service providers considered intentionality to be entwined with other aims of the Act in terms of increasing personal responsibility, emphasising individual agency and conflating intentionality with priority need in this instance:

'I can see there's some logic in terms of, you shouldn't make families with children intentional et cetera, but all this stuff is supposed to be around giving them personal responsibility, especially with Westminster government in terms of Universal Credit, handing back control to themselves. If people choose not to pay their bills, pay the rent, rack up arrears, get evicted'. (LA, A3)

Priority need

4.70 In the local authority survey, twenty respondents reported that their local authority has not changed their application of the vulnerability test under s71 in the last year, while two reported change in this area. For one authority, this meant applying a test similar to the Johnson Test²⁵ with the new test being viewed as *'not as harsh'*. The other reported offering more people help with temporary accommodation whilst enquiries are made *'in line with recent case law'*.

4.71 Fifteen respondents to the local authority survey stated that they have not changed their approach to those leaving prison and/or youth custody in the last year, while seven stated that they have. Two of the seven local authorities no longer automatically offer accommodation, with one of these stating that *'resources do not permit this from continuing unfortunately'*. Five of the seven local authorities refer to more preventative work in the form of a partnership with probation, prison resettlement posts, and following the pathways for people leaving prison. One of these voiced a concern that probation services were putting pressure on them to accommodate prison leavers not in priority need. One authority discussed obstacles to a more preventative approach:

²⁵ The Johnson test is related to the Hotak, Kanu and Johnson Supreme Court judgement from 2015 when a working definition of priority need stated a person should be: *significantly more vulnerable than the ordinary person when made homeless*

'Given frequent failure of adherence to the prisoner pathway, we have to regularly chase urgent information after very little notice of release'.

- 4.72 Among service users there appeared to be very different levels of understanding of priority need and the different sections and duties involved in the legislation. Some people were aware that they were considered to be priority need:

'She was probably the one that managed to get me somewhere so quickly as well, I don't know. I don't know. ... She did say priority need on the phone to a man and he asked her, 'Do you have proof', and she said, 'I'm reading a letter of diagnosis now.' (SU, A1)

'What they did emphasise is that as soon as I phoned them they sent a letter back to explain what my circumstances were because I was regarded as homeless they've got a duty - I know it's awful now knowing it - they've got a duty to provide accommodation for me so they made sure that I was aware of that'. (SU, A4)

- 4.73 For those interviewed who were single and without health or diagnosed mental health issues, there seemed to be a more general understanding that they were unlikely to be rehoused, even though most had registered to be on the waiting list for social housing.

'I did register to go on it. That was part of the process in meeting with [housing options staff]...I should imagine that I'm no longer on the list, but realistically speaking, I'm a single person, no dependants, I'm not in their priority at all.' (SU, A5)

- 4.74 For service providers, as with intentionality, the longer-term impact of using 'priority need' was recognised in relation to resource implications:

'I can understand that in the long term...If you took some groups out of the equation, just made everybody priority need, I don't see how that would work financially because I don't think we've got the temporary accommodation available and I think that could be quite financially crippling to every local authority.' (LA, A3)

- 4.75 Whilst this local authority service provider considered the Act to be still at a 'bedding in' stage, others considered that positive changes could already be identified. Another clearly indicated that they considered the prevention approach to be working as only one person had been rehoused as through the section 75 duty in their authority in the last ten months, *'in the last ten months, I've only had one reach the full duty, Section 75, because I've housed everybody beforehand'*. (LA, A1). This service provider believed that the combination of, or 'the domino effect', of *'going from advice (s.66) and assistance (s.73)'* in conjunction with the timescale had worked.

4.76 Service providers across sectors acknowledged the difficulties in finding appropriate accommodation for people with complex needs, even if they were considered to be in priority need. Service providers also highlighted that long waiting times resulting in further challenges for service users particularly if the property offered may not have been their first choice, or in an area where they wanted to live:

'If they're unintentional and priority then they're straight in the emergency band. It's a case of sitting tight in a B&B or a refuge or hostel until they're offered accommodation which is why we struggle to engage sometimes because they know, I'll just wait until somewhere comes up that I like a bit'. (LA, A3)

4.77 However, among local authority service providers across case study areas there was consensus that the Act had improved outcomes for people deemed to be in non-priority need:

'It's probably improved for those who were non-priority... Obviously, from a legal point of view and a duty then it's improved for them, but certainly not for prison leavers because, obviously, they were automatically priority need before, whereas under the new legislation I would say very few are now.' (LA, A3)

4.78 Overall, it was felt by local authority service providers that there was variation across case study areas and across client groups with those not considered to be in priority need benefiting much more from the changes.

Local connection

4.79 Responses to the local authority indicated a perception that the absence of a local connection test in s66 and s73 has increased demand for homelessness assistance. More specifically, two local authorities reported a substantial increase, 15 a slight increase, and five no change. This is an increase from the first wave survey when one authority indicated a substantial increase, thirteen a slight increase, six no change, and two a slight reduction in demand.

4.80 Four respondents to the local authority survey stated that there has been a change in the last year in their process for providing support for people seeking assistance without local connection, and 18 stated that there has not. All four of those making changes explained this as an increase in support. One local authority attributed this to their gateway which better captured referrals for support. The other three referred more specifically to the type of available support. This takes the form of support to relocate, and, for those that cannot be referred back, reduced support is offered:

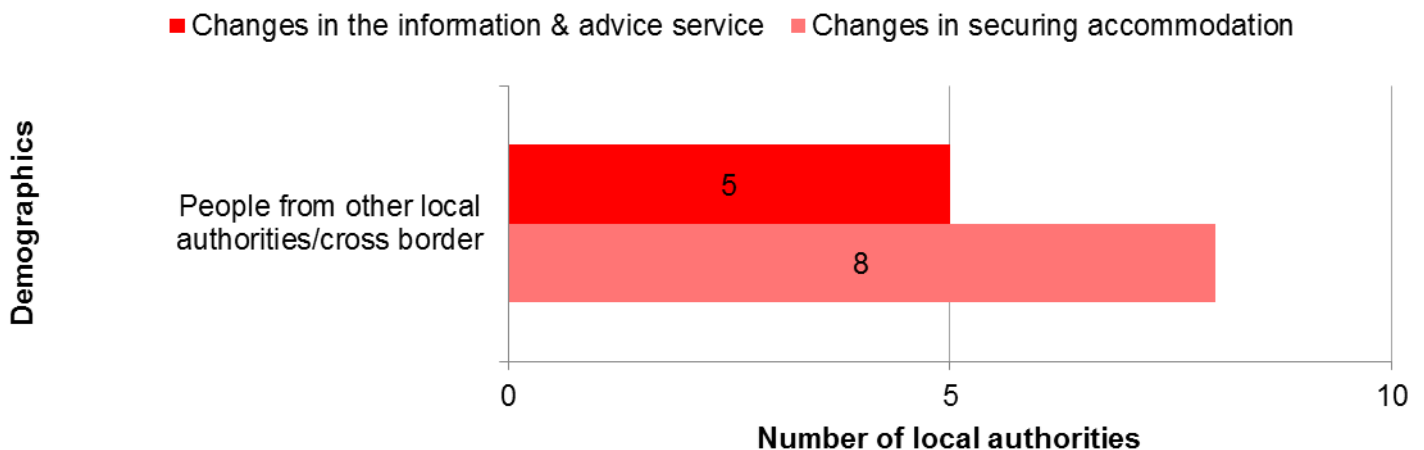
'Although we do assist, we do not provide deposits'.

'Support is given to assist people to look in the private sector also the allocation policy banding'.

4.81 Two of the local authorities that have not made changes justified this in terms of there being no need to do so. One added that they *'have very few cases from outside the county'*. Three authorities reporting no change stated that they do offer support on a case by case basis, which might include reasonable steps to help secure accommodation, signing up to the housing register, referrals to other agencies, or help to return to the area where they have a connection. One of these local authorities stated that *'there has been a growth in the number of people presenting from other areas'*. Two felt that they were being asked to pick up applications which could be accepted by other local authorities. For example:

'No change since legislation came in however other local authorities are refusing to accept and are trying to push the duty to us'.

Figure 15: People from other local authorities/cross border



4.82 Only five local authorities reported making changes to the information and advice service for people from other local authorities/cross border in the last year. Four respondents explained these in terms of there now being an initial assessment, although referral to other local authorities may still take place *'if no local connection found'*. However, one of these local authorities said that they had experienced cross border issues in the last year, in the form of *'difficulties with English local authorities accepting or responding appropriately to referrals'*.

4.83 Those that have not made changes described this in terms of it not being necessary (two local authorities), with one of these stating that they *'Follow the Code of Guidance as necessary'*. One local authority is in the process of change, in the form of a new IT

system, including ‘improved website facilities/information’. One respondent pointed out how, despite not having made changes, there is still additional work:

‘There has been a noticeable increase in numbers from outside the county making applications, even if they are not in priority need there is still additional work’.

4.84 Eight respondents to the local authority survey reported changes in relation to securing accommodation for people from other local authority/cross border. Two of these feel that people are coming into their area due to the quality of services available. One of these felt that this was down to household perceptions, while the other felt that households were advised to go to their local authority area by other agencies. One respondent expressed frustration with another authority:

‘We are having an issue with one local authority not taking an application as they are from this area so re-directing back here even though they want to make an application elsewhere’.

4.85 Two local authorities reported cross border issues. For one this involved ‘*Some difficulty referring to English LAs*’ while in the other, there were more people coming from across the border. For one further respondent, the issue was in ‘*Explaining the local connection criteria*’ itself.

4.86 Those that have not made changes cited not considering local connection as part of the initial homeless assessment and offering ‘*support to clients who chose not to return to their local borough and are sleeping rough to have help from the reconnection service*’.

4.87 The majority of service users (134) had a local connection across the local authority areas.

Table 8: Local connection across local authority areas

	Local Connection	No Local Connection	Unknown
A1	20	3	2
A2	25	1	1
A3	24	1	
A4	20	1	
A5	21	3	1
A6	24	4	2

4.88

4.89 Service user experiences suggest that no local connection was used to deny services to those interviewed in only one authority (A2). One service user described having to prove their local connection:

'I'm not born in [town], although I've been here for 22 years, I was asked to provide evidence that I've lived here for over five years, and they wanted documentary evidence of bills at previous addresses. I haven't got it! I don't keep that. When I went to prison, I lost all my stuff, so that's another thing. I don't have any, so I've got to sort that out, apparently, if I want to stay on the housing register. I think that's a bit of a silly thing. ... It's ridiculous, when I claimed housing benefit for the best part of 20 years down here, so all they need to do is look on their computer and they can see, so why have I got to?' (SU, A2)

4.90 Service providers reported that local connection presented particular issues for local authorities that were considered to be more desirable to live in:

'We're a holiday area as well, so we've always had the out-of-counties, came here on holiday, liking it and want to stay, but we did get a few from England when the new legislation came out at first.' (LA, A1)

4.91 Significantly, among service providers there was variable understanding of what constituted local connection. Some were confused about how to apply it and there were significant differences reported in terms of how case study areas used local connection and uncertainty about which sections of the Act applied and when. There was also evidence that local connection was used to manage and gate keep resources

'There's a lot of misunderstanding as to when you then refer back to another authority. Some say you take a section 62, and then you refer straightaway. Some say you accept a 73 or 66, and then refer. [There is] a lot of confusion'. (LA, A1)

4.92 Disparity between the way in which individual service providers (within the same authority) interpreted local connection was also apparent:

'I'm again quite loose on local connection. I had a gentleman, and it was an argument between me and a co-worker, he was saying he had a cousin but all his other family had died'. (LA, A1)

4.93 In this instance, this local authority service provider and their colleague disagreed over the type of family relationship that constituted a meaningful local connection. The participant concluded that *'People take the local connection a bit too seriously: they're like, 'We don't want people from outside coming in'. Yes, 'send them back to where they came from!' I'm*

like, well you know, that's not fair.' They did, however, concede that *'reasonableness'* had to be considered as *'we can't just say 'yes, you've got a tenth cousin here, when your sister lives in another authority, you might go to her for help.'* (LA, A1)

4.94 Indeed, some service providers felt that the Code of Guidance was not helpful in such circumstances. Where guidance did exist, some local authority service providers still took action to help service users even when they considered their claims of local connection to be rather tenuous:

'People will try and find a connection...we only use like the parents, brothers or sisters as a local connection, but they will say they've got an aunty who lives in [Welsh town], and have done for years. They may not have spoken to them for a long, long time, but we will contact those persons, just to see if we can establish a local connection. Sometimes you can't, and you just have to send them back.' (LA, A3)

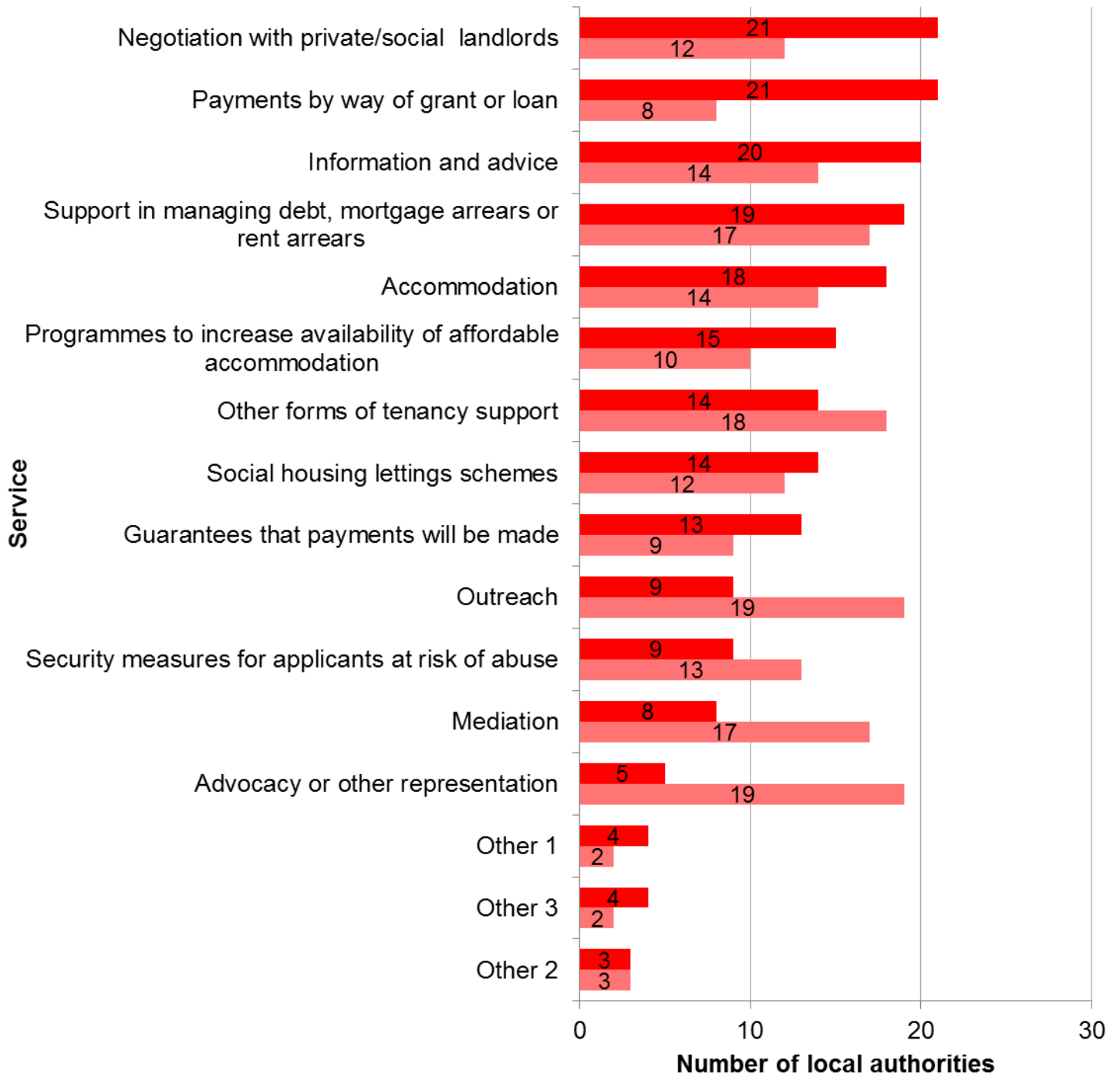
Help to Secure accommodation

4.95 Responses to the local authority survey illustrate that most of the Help to Secure services are offered in each of the local authorities, although not always through in-house provision. The results are similar to those for Prevention in that negotiation with private/social landlords; payments by way of grant or loan; and information and advice are most likely to be offered by in-house provision. The types of Help to Secure services most frequently reported as increasing in the last year are also similar to those identified under Prevention: information and advice; accommodation; support in managing debt, mortgage arrears or rent arrears; and payments by way of grant or loan.

Figure 16: Provision of help to secure accommodation (N=22)

For each of the services listed below, to help secure accommodation for homeless applicants under s73 of the Act, please indicate whether they are provided via Local Authority or via non-Local Authority provision

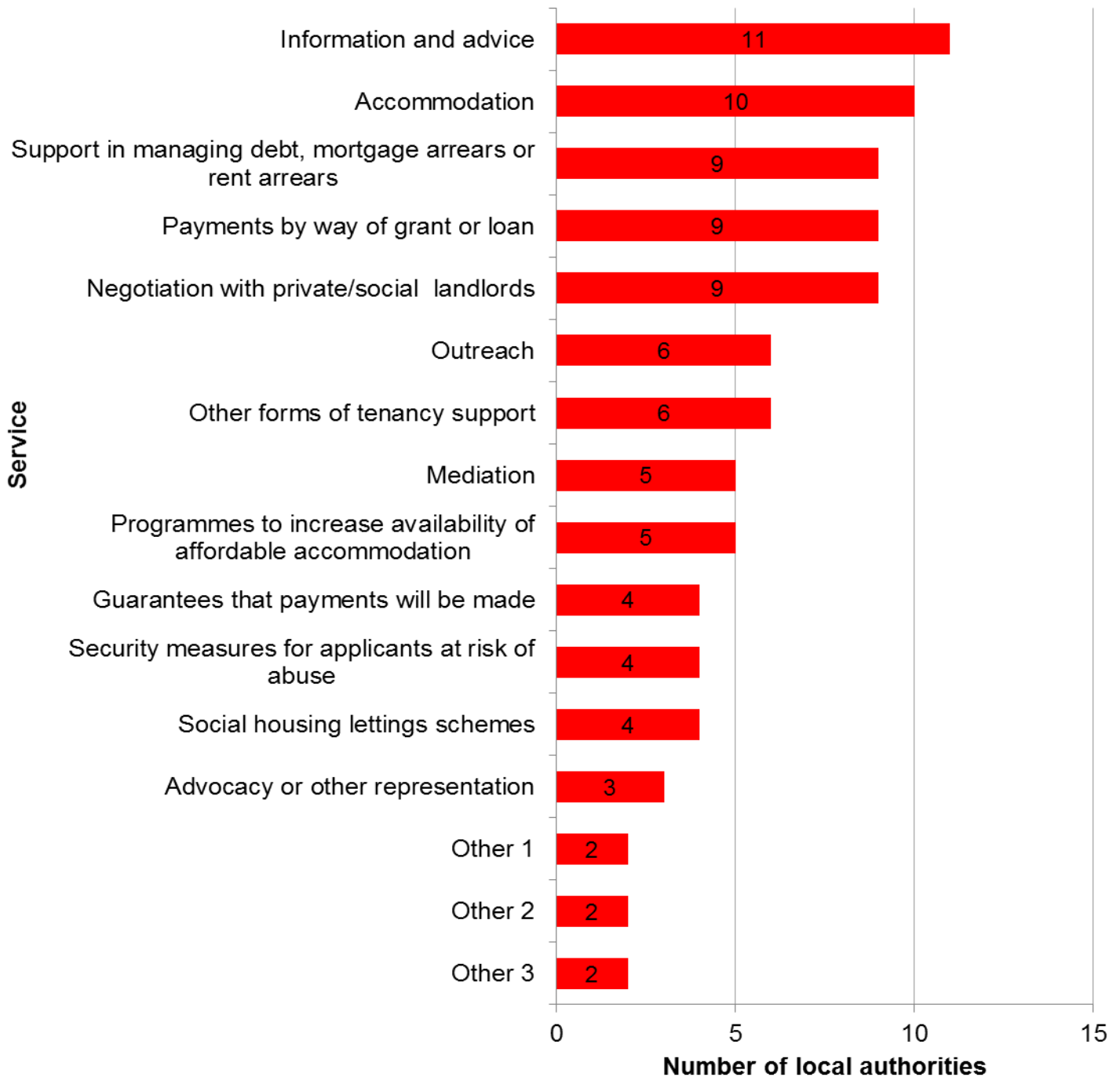
■ Local Authority Provision ■ Non-Local Authority Provision



4.96 One local authority reported increases in its in-house provision of bonds; a white goods scheme; and transitional funding. Other help to secure services reported included the provision of bonds, joint working with RSLs, and the ASB Team, all provided in-house. One local authority reported increases in its in-house provision of bonds; a white goods scheme; and transitional funding.

Figure 17: Increase in provision of help to secure accommodation in the last year (N=22)

Please also indicate whether the provision of this service has increased in the last year



Changes in accommodation use under Help to Secure

4.97 More than half of local authority survey respondents consider there to have been a change in the use of the private rented sector in their authority in the last year. More specifically, two local authorities reported a substantial increase, ten a slight increase, six no change, three a slight reduction, and one a substantial reduction (see figure below). Those reporting a substantial increase attributed this to giving this *'specific attention'*, and *'good working relationships with our social lettings agency and also the flexibility of transitional funding'*.

4.98 Of the ten local authorities that reported a slight increase, seven stated that they are making efforts to engage PRS landlords. Four of these referred to having extra staff for this work. For example, one authority referred to having a local lettings agency within their team. One local authority stated that the increased work with the PRS was *'due to lack of affordable social housing'*. However, two others saw customer attitudes as changing. For example:

'Clients now see it as an acceptable alternative to social housing due to stronger links with private landlords'.

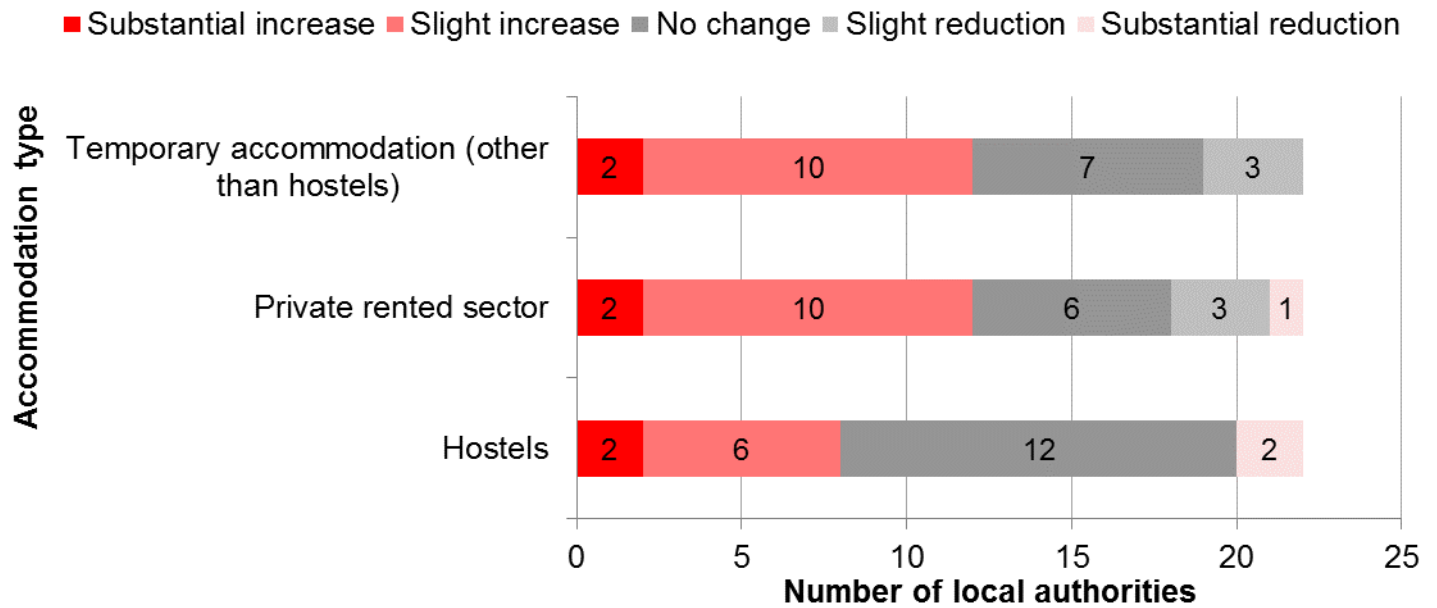
4.99 One said that there had been no change, as the good links with landlords were dependent upon significant work from the local authority in the form of *'tenancy related support and money management support'*. Two pointed to ongoing issues that they have been unable to resolve to date. For example:

'Historically it has always been hard to rent in [local authority area] due to reluctance to let to homeless applicants and also the high rents which are not covered by LHA [Local Housing Allowance]. Guarantors are also required, which we cannot facilitate at the moment'.

4.100 Of the six local authorities reporting a slight reduction, two explained this through PRS properties becoming harder to secure and the rise in prices meaning that *'many [landlords] do not want tenants who are on benefits anymore'*. One put this down to the loss of a shared housing property, *'which resulted in a loss of 5 units'*. The local authority reporting a substantial reduction attributed this to a combination of landlords not registering with Rent Smart Wales and Welfare Reform:

'We are unable to discharge duty into properties where the landlord is not registered. Universal Credit has made it difficult to engage private landlords due to the delay in payments and the issues with providing rent direct'.

Figure 18: Changes in accommodation use under Help to Secure (N=22)



4.101 Fewer respondents to the local authority survey felt there had been an increase in the use of hostels in their authority in the last year. Two local authorities reported a substantial increase, six a slight increase, 12 no change, and two a substantial reduction. Those respondents that felt there had been a substantial increase both referred to single people, with one perceiving an increase in *'7-day placements in our own local authority managed hostel under reasonable steps'*.

4.102 Three local authorities that reported a slight increase explained this as a result of the nature of those presenting. In one of these this meant an increase in rough sleepers and an *'increase in customers with supported needs needing supported accommodation'*. In the two others, this took the form of individuals with complex needs who are not eligible for other services and hence *'often more difficult to move on into suitable accommodation'*. For three respondents, the slight increase was explained through a change in management approach, with Supporting People projects now *'supporting the Act more'* in one authority. One respondent reported having *'opened up the use of a supported emergency bed to those who are not in priority need, when not being used by someone who has been placed by the Authority'*. One explained the increase as follows:

'We will not allow anyone to rough sleep. This has meant an increase in the use of B&B and hostels for those people who do not have an apparent priority need'.

4.103 Of the 12 local authorities reporting no change, explanations varied between the four that reported continued steady/high demand and the two with *'no hostels in the area'*. Two local authorities were hoping to improve the situation as *'demand for services can be better managed'* through the support gateway, and putting measures in place to *'monitor*

support provided to our clients'. As an example of high demand, one respondent stated that:

'We have a family hostel... and this has been full all year, it is used for emergency accommodation rather than B&B. Applicants are staying longer at the family hostel due to investigations taking longer'.

4.104 In one of the local authorities that reported a substantial reduction, this was perceived to be a result of *'better prevention'*. In the other authority, this was a result of not having hostels and no longer being able to refer to neighbouring authorities due to changes in the eligibility criteria.

4.105 Over half of authorities reported an increase in the use of temporary accommodation (other than hostels) in the last year. More specifically, two reported a substantial increase, 10 a slight increase, seven no change, and three a slight reduction. In one local authority reporting a substantial increase in use of B&Bs, this was put down to the *'limited stock of temporary accommodation and lack of move on accommodation across all housing sectors'*.

4.106 Authorities reporting a slight increase attributed this to a range of issues, with one respondent citing a link to the lack of move on accommodation and four others explaining the change through needing to accommodate people for longer due to an increase in numbers of people with multiple needs, *'the investigation period to establish if some are in priority need'*, and large families. For example:

'We have large number of families on our radar as high risk or homeless due to issues such as benefit cap, rent arrears, landlords selling up. When large families do access our temporary accommodation or emergency units, the length of stays are far more significant due to lack of larger family properties in social and PRS.'

4.107 Of those local authorities reporting no change, one stated that while there has been no change in overall numbers *'they are accommodated for longer because we have difficulty in finding suitable move on accommodation'*. Another commented that while there has been an increase in homeless presentations of single people, this has not impacted upon the use of temporary accommodation as most are not been in priority need and no temporary duty is owed. Two local authorities that reported no change expanded to say there may have been reductions. One of these added that *'this includes advising clients that they are likely to be offered private rented either way'*.

4.108 One local authority reporting a slight reduction felt that this could be explained by the *'high quality of prevention work being undertaken by the authority'*. Another authority put the

reduction down to *'the change in priority need for offenders'*. A third qualified their response by commenting that the slight reduction in number of households occupying B&Bs and the slight reduction overall in time spent in temporary accommodation was offset to some extent by a *'slight increase in family type accommodation'*.

Duty to Secure

4.109 Half of respondents to the local authority survey reported an increase in the last year in use of the private rented sector to fulfil their duties to secure accommodation for applicants in priority need. Two saw this as a substantial increase, nine a slight increase, eight no change, one a slight reduction, and two a substantial reduction (see figure below). One of those reporting a substantial increase put it down to *'the lack of social housing resources the PRS has been used significantly'*, while the second felt that there were a *'higher number of total s75 cases due to timescales of when act implemented'*. Among the nine local authorities that reported a slight increase, there was a contrast between those that saw it in terms of sourcing housing to meet demand (two local authorities), and new ways of working (two local authorities). As an example of demand:

'Increases are a reflection of overall demand for accommodation and move on rates... Not specifically a change in process or ways of working'

4.110 On the other hand, another local authority respondent attributed the change to new ways of working:

'Number of full duty cases has decreased due to the prevention work undertaken early on in the process this has resulted in the private rented sector is now seen as an acceptable alternative to social housing.'

4.111 One authority expressed increased use of the private sector through *'encouraging people to look at where they would like to live'*. However, for another: *'discharge of duty has allowed this but they will still seek security of tenure in social housing'*.

Figure 19: Change in accommodation type to secure accommodation (N=22)



4.112 For those local authorities reporting no change, this was attributed to business as usual in four authorities. Three of these highlighted continued obstacles, stating that they faced the *‘same obstacles as last year’* and *‘we have few cases of clients willing to accept PRS’*. The third local authority added that *‘additional charges linked to letting agents often deem the accommodation unaffordable’*.

4.113 One respondent to the local authority survey explained the slight reduction to it seemingly being *‘more difficult to secure privately rented accommodation’*. Similarly, both responses indicating a substantial reduction attributed this to the lack of affordable PRS properties and welfare reform. For example:

‘Rents within the PRS are increasing and due to the high demand more landlords are refusing to take tenants on benefits’.

4.114 Two local authorities reported a substantial increase in the use of social housing in the last year, eight a slight increase, and 12 no change. This is consistent with the secondary data, which shows that local authority social housing is most frequently used to relieve homelessness. Of those noting a substantial increase, one commented that they have amended their allocations policy to give *‘additional preference’*, while another local authority noted the higher overall numbers of s75 cases.

4.115 Of those respondents reporting a slight increase that offered explanations beyond reviewing the allocation policy and waiting list, four referred to meeting changing patterns of demand for homeless households and the way they have been able to achieve positive outcomes from this. For example:

'We haven't changed our processes or policy for social housing in any significant way to respond to changing demand for homelessness but with more households becoming homeless we have had an increase in positive outcomes into Social Housing through our Common Housing Register.'

4.116 Of the 12 local authorities reporting no change, only two offered further explanation. For both this was due to conducting business as usual, with one pointing towards restricting factors:

'Limited stock becoming available... single person unable to be considered for 2 bed accommodation... strict pre-tenancy assessment on affordability'

4.117 Less change was reported in the use of supported housing in the last year. Six local authorities recorded a slight increase, and 16 no change. Of those six reporting a slight increase, two attributed this to increased demand, with one stating that *'there are more young people approaching for assistance'*, and the other that *'more people are presenting with complex multiple needs'*. One other local authority explained the increase through a review of the process of accessing supported accommodation:

'The pathway into supported accommodation has had a review to ensure it is more robust and that clients accessing this accommodation actually require support and that the support offered meets the need of the client'

4.118 The only explanations from those local authority respondents stating no change concerned business as usual (one authority) and lack of engagement from providers to offer placements *'despite our efforts to support the applicant through the assessment process'*.

Summary

4.119 It is evident from the local authority survey that a wide range of preventative services are offered across local authorities and overall there appeared to be a relatively even balance in local authority/non-local authority provision of these services. Over half of local authorities have increased the provision of preventative services in the last year.

- 4.120 A clear majority of respondents to the local authority survey perceive that their local authority has undertaken more preventative work in the last year (including for people at risk of homelessness in more than 56 days), the preventative work is more inclusive, and that increasing the period that applicants are considered to be threatened with homelessness to 56 to have had a positive impact. A smaller majority considers this preventative work to be more effective.
- 4.121 Local authorities offered a mixed response when asked whether there has been a change in the level of prevention resources that they have available. Over half of local authorities reported significant problems due to limited resources for preventative services, with the majority of these stating that demand for services outstrips their capacity to supply them. Over a third of authorities have reportedly reallocated resources including transitional funding and Supporting People funding to offer preventative services
- 4.122 A majority of local authorities indicated that they have maintained their application of the vulnerability test under s71, and to those leaving prison and/or youth custody over the last year.
- 4.123 Half of local authorities report an increase in use of private rented sector and temporary accommodation under Help to Secure. Local authorities also report an overall increase in the use of hostels under Help to Secure in the last year, albeit to a lesser extent.
- 4.124 In terms of demographics, the biggest change in securing accommodation was reported for single people, with a majority of respondents to the local authority survey stating that it is becoming more difficult to secure. This is primarily attributed to affordability/lack of suitable accommodation. Half of local authorities consider there to have been changes to securing accommodation for people with mental health issues, due primarily to a perceived increase in presentations and the affordability of specialist accommodation. This was closely followed by rough sleepers. Increased difficulties were also noted for people from other local authorities/cross border, and people with '*protected characteristics*' (other than mental health), although to a lesser extent.
- 4.125 Half of local authorities reported an increased use of the private rented sector in the Duty to Secure. This was closely followed by social housing. A smaller increase in the use of supported housing under Duty to Secure was also noted.

- 4.126 While three authorities indicated that they have made changes to their position on intentionality in the last year, a clear majority of local authorities have not disregarded intentionality for the purposes of s75 for a specific priority need group. In the four local authorities that have, this has been primarily for 16-17 year olds. However, respondents to the local authority survey were keen to point out that intentionality was used primarily for the purposes of negotiation in the rare cases that it was used.
- 4.127 A majority of local authorities believe that the absence of a local connection test in s66 and s73 has increased demand for homelessness assistance. Four local authorities have made changes in their process for providing support for people seeking assistance without local connection in the last year, primarily in the form of increased support.
- 4.128 There is much evidence of creativity and commitment among service providers in the execution of reasonable steps and positive impacts on the lives and experiences of service users. Therefore it is clear that the Act has fundamentally changed the way that Housing Solutions Teams work with people who are homeless/threatened with homelessness across Wales. However, this is not uniformly applied and there is significant variation between and within authorities. Arguably, the skills required to implement the Act differ significantly from the previous legislation, where the focus was on assessment and it appears that not all staff have the requisite skills to successfully implement the new arrangements (this is discussed in more detail in the following chapter).
- 4.129 It is evident that service user outcomes are affected by structural factors (availability of housing and support in a particular area) and individual factors (interaction with service providers). The housing outcomes for service users across the six case study areas attest to this.
- 4.130 The ethos of the Act, the extension of the period when people are threatened with homelessness and the specification of '*reasonable steps*' were broadly welcomed; and there are many positive examples where local authorities are taking reasonable steps. However, although the Act provides a framework, some aspects of it, specifically, '*reasonable steps*' are subject to variable interpretation which can negatively impact on service user outcomes. There are also concerns that standardisation of service delivery could disadvantage those service users with vulnerabilities or those who have capacity issues.

- 4.131 There is also evidence that not all service providers have fully engaged with the ethos of the Act, and that the old system of gatekeeping and assessment still persists. It is also important to note that local authorities cite financial assistance as a significant prevention activity, and there are future resource implications as transitional funding currently sustains this. However, it should be noted that while nine service users across the local authority areas reported they had been promised financial support in the form of a deposit and first month's rent when moving into private rented accommodation, only three people actually received this.
- 4.132 Although 21 out of 22 local authorities confirmed that they take steps to maintain contact with households who miss appointments with Housing Solutions, there was a significant number of service users who were unaccounted for in the research. The study team were able to verify the housing circumstances of 90 service users from the original 154 research participants at the time of the second wave of fieldwork (6 months later). However, the whereabouts of 64 people were unknown and this was a concern. It would be supposition to state that these people's housing circumstances had been resolved or they had withdrawn from the system because they were not receiving support. It is also possible that people's personal circumstances meant they ceased to engage with Housing Solutions Teams. In most instances cases had been closed but the reasons for this were not always clear.
- 4.133 The 2016-17 local authority data return shows that there has been an overall increase in the number of recorded cases at each of the main stages: 9,210 at s66; 10,884 at s73, and 2,076 at s75. Overall 5,718 households were prevented from becoming homeless in March 2016 – April 2017. In the same period, 4,500 were relieved, and 1,674 received a positive discharge. In March 2017, 2,013 households were accommodated temporarily – an increase of 138 from the same period in 2016.
- 4.134 Fifty service users of a possible 154 contacted in the second wave had been rehoused in social housing (33) or the private rented sector (17). This represents almost a third of the original sample. However, a significant number of service users who participated in the research remained in insecure/temporary housing (21) six months after they presented as homeless/threatened with homelessness, and nine were rough sleeping.
- 4.135 There is significant variation across authorities and within Housing Solutions Teams regarding understanding and interpretation of local connection and intentionality. Many service providers perceive intentionality as being counter to the ethos of the Act, however, there is evidence that intentionality is still used to manage access to support and services. This potentially has detrimental impacts on outcomes for service users.

5. Implementation and Administration

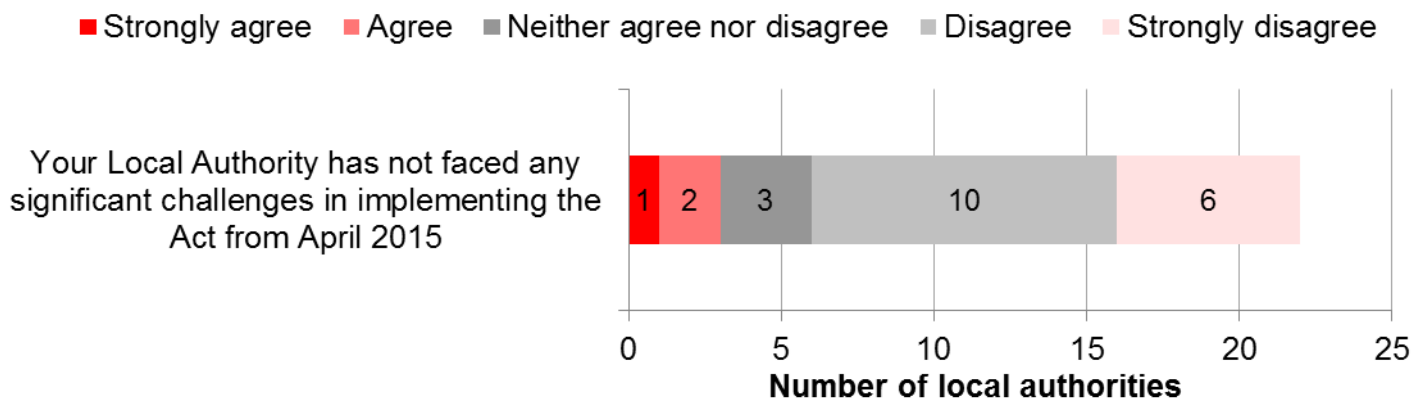
Introduction

5.1 In this chapter the implementation and administration of the Act is discussed. Findings are organised under the following headings: challenges in implementing the Act; demand for services; bureaucracy; the Code of Guidance; IT infrastructures; benchmarking, statistics and monitoring.

Challenges in implementing the Act

5.2 From the local authority survey, a clear majority (16 respondents) indicated that they had experienced challenges in implementing the Act. Six respondents strongly disagreed with the statement that their local authority has not faced significant challenges in implementing the Act from April 2015, 10 disagreed, three neither agreed nor disagreed, two agreed and one strongly agreed. Overall, this is similar to the number of local authorities that reported experiencing challenges in the first wave survey, when overall 17 local authorities indicated that they had experienced challenges (eight strongly disagreed and nine disagreed).

Figure 20: Challenges in implementing the Act (N=22)



5.3 The challenges most frequently reported by local authorities are administrative burden; lack of affordable/suitable private rented sector accommodation; and increase in the number of cases, as seen in the figure below. This is similar to the first wave survey, when the three most frequently reported challenges were administrative burden; lack of suitable/affordable accommodation; and financial resources. Other challenges in the second wave survey include a *'lack of affordable one-bedroom properties within both social/private sector'*, reported by one local authority, and *'more complex clients'* reported by another:

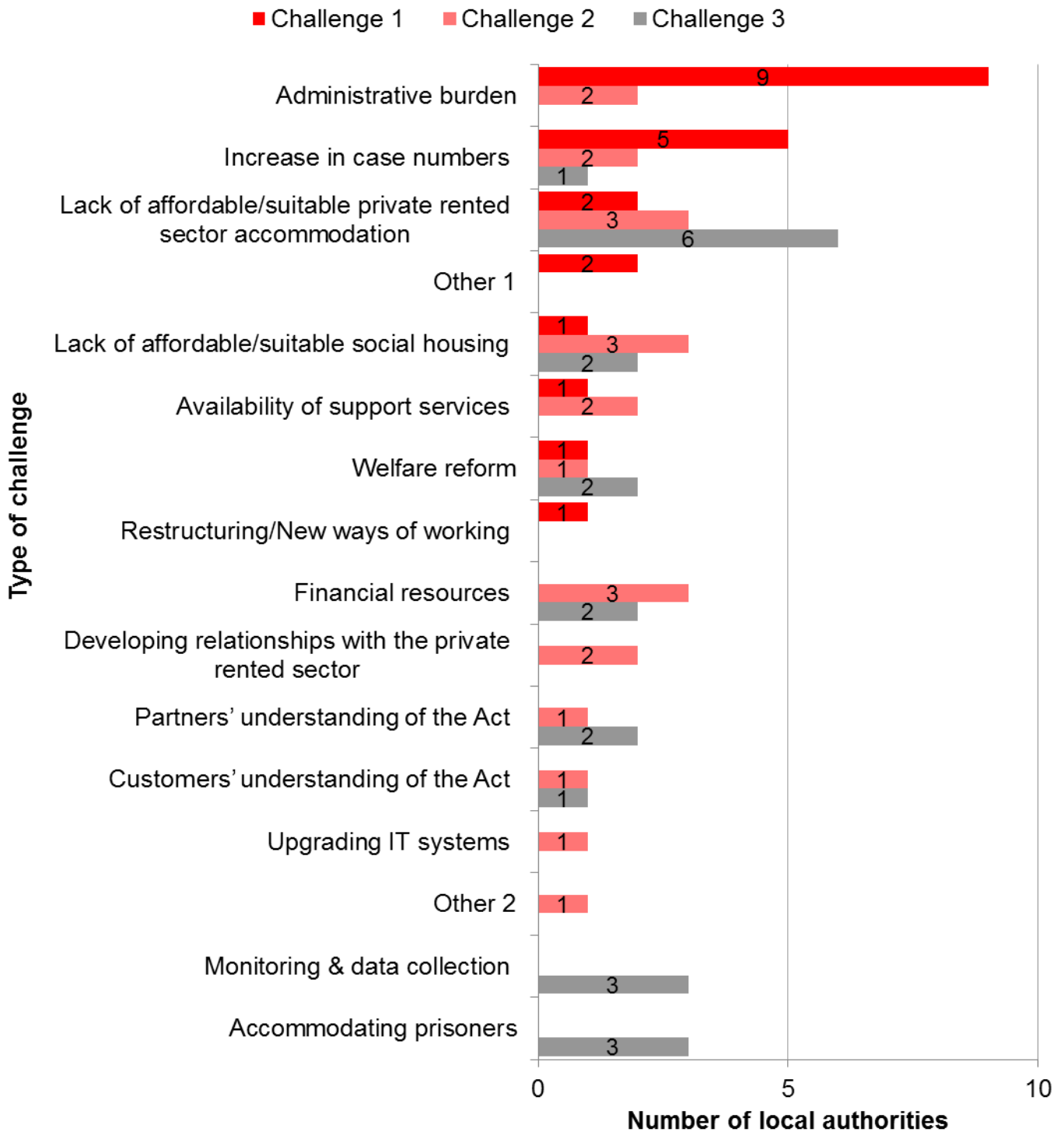
'Other services often fail customers and don't provide appropriate interventions which compound and increase risk of homelessness, meaning we (the final safety net) absorb far more high needs and complex cases who cost more to manage through longer stays in temp and emergency accommodation'

5.4 The same local authority also reported *'lack of supported accommodation options'* as another challenge, particularly as *'Increasing numbers of clients with support needs means we need more supported housing'*. Indeed, this authority reported a fear that:

'With proposed changes for supported accommodation rent regime and impact of welfare reform, partners who traditionally develop supported housing will be reviewing their position and risk of new developments'.

Figure 21: The top three challenges reported by local authorities (N=22)

What would you say were the top 3 challenges your Local Authority faced in implementing Part 2 of the Act in the last year?



Note: Accommodating prisoners has been renamed from 'Prisoner pathway' in order to more accurately capture the challenge rather than the intended solution.

Demand for services

5.5 When asked *'What has the impact of the Act been on demand for homelessness services in your Local Authority in the last year'*, 12 respondents to the local authority survey indicated a perceived substantial increase, seven a slight increase, and one no change. Two responded *'other'*.

5.6 Those local authorities reporting a substantial increase were split between those which viewed this as resulting from an increase in the number of people accessing services (six local authorities), and those which saw it primarily as an increase in workloads. In one LA, the increase was primarily in single people:

'We have seen a substantial increase in homelessness presentations, particularly from single people. Over 70% of total cases have been single people and due to the lack of suitable and affordable accommodation, obtaining a positive outcome for this group is very challenging'.

5.7 Preventative work and the amount of help that people are entitled to were seen by five local authorities as resulting in increasing workloads. The complex needs of those accessing services was cited by one respondent, while another was concerned that the increase was not being picked up in the statistical return:

'The number of clients approaching the authority has significantly risen and this work is not recognised in the [statistical] return as no outcome is recorded however the amount of work spent on this is high'.

5.8 The responses of those local authorities who perceived a slight increase also included references to prevention and increased help available (one local authority), along with increased cases and workload (two local authorities). Two considered the prisoner pathway to have slightly increased demand for services. For example:

'The prisoner pathway itself has created an increase with any given repeat offender having several applications, with each sentence seen as a change in circumstances'.

5.9 The local authority that reported no change explained this in terms of having *'always had a number of people presenting to the Housing Solutions Team'*.

Bureaucracy

- 5.10 The bureaucracy created by the introduction of the Act – and its complexity – was sometimes overwhelming for service users who reported feeling unable to comprehend or respond to the information they received. An example to illustrate this is the following service user, a single male with no fixed address who had experience intermittent homelessness throughout his life. This man also had mental health issues and reported feeling confused and anxious by the communication he received regarding his housing situation. He understood that he was eligible for help from the local authority and was not considered to be intentionally homeless, but the different sections and duties of the Act confounded him and added to his mental distress:

'They've been giving me letters about the stages, about if I am homeless, so if I'm eligible for help or not, which I am, because I'm not intentionally homeless. ... I obviously go through it all, but I think, because at one point I went down because I didn't know what it meant, because it basically said that under whatever law, section 76, you are now discharged. Well, you know you think, they're not helping you, but they just mean that now you're under this work, 77. That could be a bit clearer.' (SU, A2)

- 5.11 Some service providers also felt that the many stages of the Act created a negative experience for service users receiving support for homelessness. For example, one participant noted that:

'Sometimes you have to go through those stages and that always seems to me to be a little bit artificial in somebody's journey. It almost feels like you have to go through those stages before you accept that this person is going to be priority need, do you know what I mean? They're asking you to go through the prevention and then the duty to help to secure and then the duty and that I don't really see that all of those, dividing up those different duties is not necessarily terribly helpful.' (LA, A2)

- 5.12 Some service users explained that their inability to properly understand correspondence was due to learning disabilities:

'Yes, I got letters and that from the council, yes, but it doesn't help when you're dyslexic either' (SU, A1)

5.13 Other service providers felt that some service users did not understand the content of the documentation: *'we've had comments of clients saying why are you sending me all these letters, I don't understand them'*. (LA, A1). Others suggested that the language used in correspondence could be perceived as *'intimidating'* particularly noting how the language and word choice can at times seem particularly officious:

'Duty' [and] 'discharge'; they're not friendly letters for our clients. Often, they've got to come to staff and staff have to double check' (TS, A2).

5.14 The lack of plain English and more formal language noting how there was a tension in producing documentation that was user-friendly, and compliant with the Code of Guidance, and providing accurate information pertaining to the Act:

'You start quoting things like Section 66, Section 68; or we've got a Section 73 duty and they're looking at you as if to say 'hang on a minute, I don't understand any of this' but all the letters are very formalised because they have to be'. (RSL, A6)

5.15 However, other service users reported more positive experiences where the detail of the communication they received was explained to them by local authority staff, suggesting that people's experiences were very much influenced by the interactions with frontline staff:

'They give you lots of information and a lot of paperwork to go through, but if you didn't understand it they would have helped you through it and explained everything to you'. (SU, A2)

5.16 This was also raised by some service providers who felt that staff were also confused by the complexity of the Act, the different stages and the need to communicate with service users at every stage:

'Because there's so many different parts to the Act... If somebody comes to you... one day and then they've all got different parts and different processes and different stages to them, they've all got different formats of letters, different this. So, it's just nice if one letter says this is it, this is how it affects you, it's a very simple thing, but no, every letter's different and it takes a while to get your head around as well. So if you as professionals are struggling, imagine the effect it has on those people that are actually engaging with the services.' (TS, A2)

Flexibility

- 5.17 Several local authority service providers spoke about how their support for someone extended beyond the 56-day period as the following examples illustrate:

'We're not stringent on it... I have to admit, it's very rare that I shut at 56 days. After a 73, it's very rare, because, for me, I think the law states, along the lines of, end the duty after 56, if all reasonable steps can be carried out. Well, sometimes, maybe I haven't found anything within that 56 days, so I don't shut. I feel, in another month or so, they've still got their points, they've been housed.' (LA, A1)

'Yes, because I've had about three or four single males, non-priority, homeless given a 73 - should be closing it after the 56 days. Held maybe for another two months and they've had a property, social housing...at the end of the day it's very, very, very difficult to turn around and say, 'Sorry, we've fulfilled the Personal Housing Plan but you're still homeless. Goodbye.' I've not been doing that and I'm not intending to! Hopefully they can see that there are statistics to show that holding it a bit longer, people are being housed.' (LA, A1)

Impact on workloads

- 5.18 Although most service providers recognised the need to be transparent and to communicate regularly with service users and to audit practices, there was criticism of the impact that this had on their working practices and workloads: *'there is too much paperwork'* (TS, A1) and *'there's a lot of bureaucracy around it'* (LA, A2). However, the nature of bureaucracy and audit trails were considered to be an inevitable aspect of the Act's implementation and provided the means to counter challenges made in relation to the actions and decisions of Housing Solutions:

'There's a paper trail for us, so if they do contact [X] and say, 'Why aren't you doing this, this and this'...We can send them all the paperwork, and then we're covered.' (RSL, A3)

- 5.19 It was, however, not seen as useful by some service providers, although they recognised that it was necessary to follow stipulated procedure to capture activities undertaken:

'We had one case the other day where we just sent the wrong paragraph in a letter and [third sector agency] are all over us like a rash and we had to withdraw that decision and make it again because it's hugely bureaucratic. There are a huge number of letters. We do quite a lot of prevention work that's outside homelessness specifically but we can't count that prevention work unless we send all the letters. So, I have made a

decision that we will send all the letters although I think it is absolutely ridiculous waste of time.' (LA, A2)

5.20 In contrast to the points made above, there was a small number of service providers who commented positively on the ways in which the implementation had been managed in their local authority. A positive step seen by one authority, was the production of a set of standard letters which was made available when the Act was first introduced:

'So [X] comes in and goes over the legislation with us, and we've got loads of helpful letter packs which have been a godsend when you've got the workload we've got. The letters are pretty much done for you, and you just put in whatever information.' (LA, A3)

5.21 As such the *'letter packs'* were seen as a time saver potentially countering the burden of high workloads.

5.22 There was a general consensus among service providers therefore, that the increase in bureaucracy as a result of the Act had impacted significantly on workloads. One service provider in a strategic role, noted how frontline staff were *'drowning in files'* (LA, A6). Some of the burden was felt to evolve from the time it took to complete the documentation: *'time-wise, yes. It's just letter after letter, and it's all just for a tick'* (LA, A1) and felt that that the process producing and distributing lots of documentation was meaningless and described it as *'letter ping pong'* (LA, A5).

5.23 Several service providers across sectors and case study areas felt that the amount of time needed for completing the necessary paperwork took time away from direct work with service users and created a *'danger maybe of taking caseworkers' eyes off the ball'* (TS, A6). In addition, workload demands were seen to have countered the attempts to embed the type of person-centred practice that is at the heart of the Act:

'One of the criticisms seems to be that the personal bit is being lost.' (TS, A1)

'It takes all the time away from the clients, really. The important work.' (LA, A1)

5.24 As such, the amount of paperwork to be completed in the course of day-to-day work for frontline officers was felt to result in increased workloads and consequently less time to spend on direct work with service users. The increase in paperwork and the subsequent impact on workloads was also felt to be compounded by the increasing numbers of people presenting as homeless or at risk of homelessness.

5.25 Other factors were also highlighted in terms of adding to increased workloads. These included reduced staffing, austerity and budget cuts. Increased workload was not seen as negative by all service providers as some suggested that working under the new arrangements meant increased job satisfaction:

'I've gone from just doing Housing Solutions [to] the full swing of homelessness advice and preventions, but I'd definitely say my workload has quadrupled. But it's much more interesting and I'm open to a lot more agencies and contact within [authority] and outside. Much better. A lot more work, but a lot more enjoyable.' (LA, A3)

5.26 Overall, an increase in people presenting as homeless or threatened with homelessness was seen as a positive by service providers but the increase in the workload of frontline staff was mentioned by many and described as being *'challenging'* and *'difficult'* with implications that *'it's hard for advisors to maintain contact and give that consistent level of support over a period of time to try and resolve someone's housing issue'* (LA, A3).

5.27 Another service provider quantified the increase in work as *'this month, we've had more than 80 cases... that's a lot. It used to be 20, 25, 30, 50'* (LA, A1). Broadening the remit of people who could receive advice and assistance was viewed positively by local authority service providers. However, this was also equated with a more complex as well as in increased workload:

'Increased volume of work with non-priorities and also it takes more time to do the assessment. Whereas it used to be, you know, it was ticking boxes... but now it's more, you know, intensive, getting to the bottom of the root of the problem and trying to tailor-make the service for the clients and then being part of it as well.' (LA, A1)

5.28 However, some service providers questioned whether the changes to their working practices had actually made any difference to the outcomes for service users:

'With all the level of paperwork; the letters; the plans; the reviews; keeping up to date. It's just endless really now. We didn't have all that before, and I do wonder myself whether there's a need for all that because the end result for most people is the same as it was under the old legislation.' (LA, A3)

5.29 Several authorities had been proactive in terms of addressing the demands for Housing Solutions and the resultant high workloads by introducing a triage system:

'So they put this triage in as a way of kind of freeing up some time for the officers.' (TA, A1)

5.30 In one local authority where a triage system had been implemented, Housing Solutions staff reflected that it was very helpful in terms of streamlining work by sifting referrals and identifying where there is a need for further assessment so that not all queries came through to the Housing Options team. Colleagues in a different role within the same local authority were more sceptical commenting on the lack of knowledge and skill of triage workers, and of the problematic impact of performance indicators:

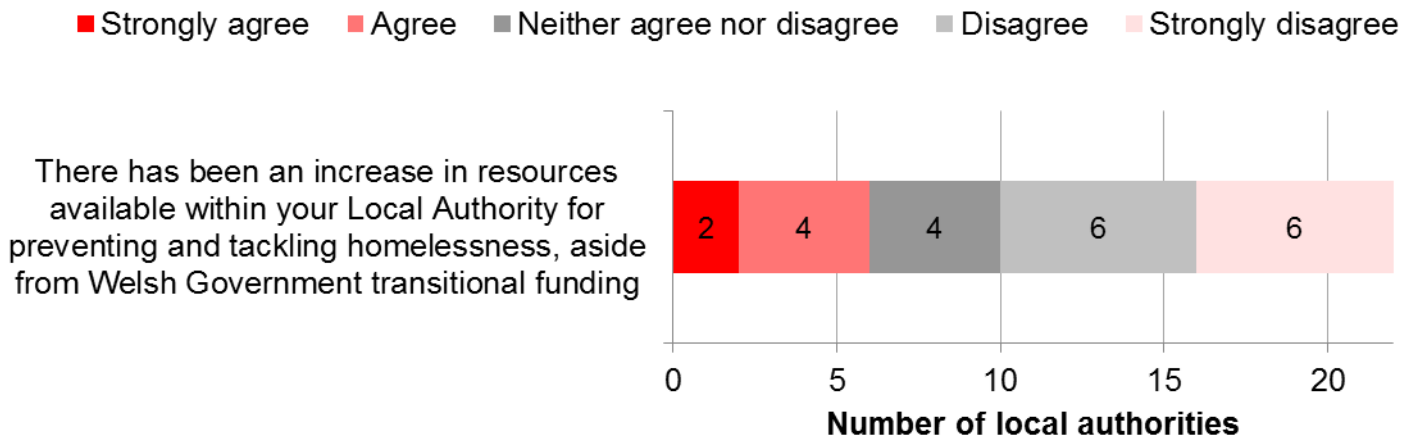
'We're not dealing with billing enquiries and adding on some extra gas, insurance; we're dealing with people's lives. It can be the simplest case. By right, if it takes 45 minutes, it takes 45 minutes and it shouldn't be driven by numbers, it should be driven by quality. If the numbers are too high and we're not answering those calls, it shouldn't be 'you've failed, you've not answered the calls' - which I think has been a bit of a culture before. It should be 'why are you not able to answer them? Is everyone busy? Is everyone flat out? Right, well then clearly, it's a resource issue' (LA, A4)

5.31 In terms of the nature of work involved in implementing the Act, there was considerable discussion about how to remedy some of the burdens of administration and bureaucracy. In essence, it was felt that the processes involved in implementing the Act could be *'simplified and streamlined'* (LA, A6). For example, *'letters need to be simplified and more simplistic language needs to be used'* (TS, A2). Moreover, many participants commented on the length of letters, the number of letters and the ways in which for many service users, the documentation was not intelligible as it was too technical. The latter point was taken up by respondents who considered this to be antithetical to the person-centred ethos of the Act.

Resources

5.32 Overall, twelve respondents to the local authority survey felt that there had not been an increase in resources available within their local authority for preventing and tackling homelessness, aside from Welsh Government transitional funding. Four respondents neither agreed nor disagreed, and overall six felt that there had been an increase in resources.

Figure 22: Increases in local authority resources (N=22)



5.33 When asked how their local authorities had met changing demand in the last year, the most frequent responses were Transitional Funding; closer relationships with Supporting People services; and closer relationships with other external partners. Both ‘other’ responses referred to additional staff, with one stating that this was not funded through Transitional Funding, and the other adding that they are ‘still working on bringing in more

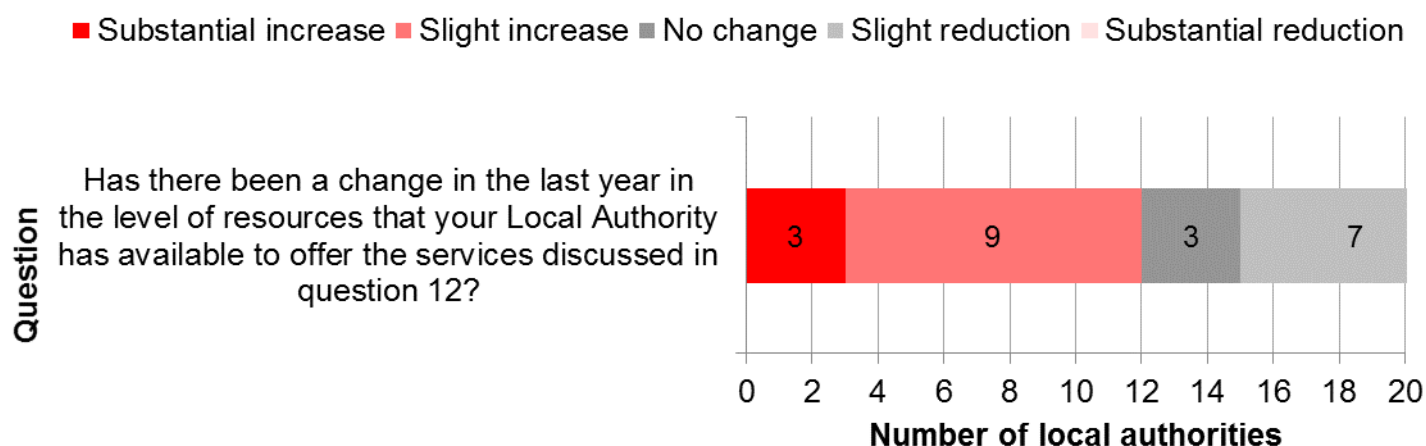
Figure 23: Local changes to meet demand (N=22)



Resources for prevention

5.34 Responses were mixed regarding change in the level of prevention resources available, as illustrated in the chart below. Overall, 12 respondents felt that there had been a substantial or slight increase in resources. However, three felt that there had been no change, and seven a substantial reduction.

Figure 24: Change in level of prevention resources (N=22)



5.35 Nine local authorities stated that there has been a change in the last year in how they allocate resources for Prevention services, while 13 stated that there has been no change during this time (see figure below). Changes in allocation of resources in order to offer services were explained in terms of transitional funding (two local authorities), which one local authority respondent noted was used to support additional payments to prevent homelessness, but another noted had been reduced. Two local authorities referred to Supporting People funding, which was reallocated and used to re-model projects and fund Shelter posts. One local authority has employed more Housing Solutions staff, which has enabled all applicants to be given an interview. Two other local authorities discussed a need to prioritise cases, with one of these piloting 'a shared accommodation scheme for single people with support needs'. One local authority has taken steps to offer more help for clients 'to move into settled accommodation in the private rented sector'.

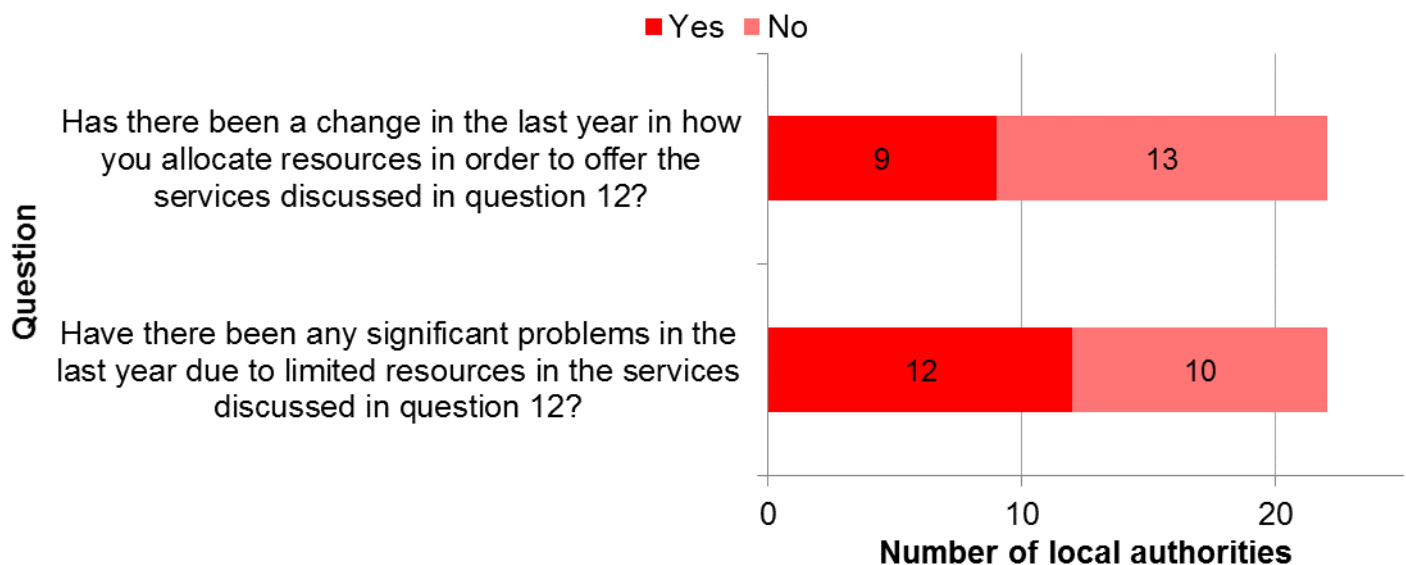
5.36 Twelve local authorities reported experiencing significant problems in the last year due to limited resources. Eight of these local authorities explained this in terms of demand outstripping supply. For one respondent, there was variation in demand, however:

'There are higher demands for service for certain client groups, some complex cases are very time intensive and we have amended our duty/ triage system to cope with this... There are peak times of the year where demand is higher'.

5.37 One local authority referred specifically to temporary accommodation, which it felt has *'become very problematic and needs further resourcing'*. Three of these eight responses referred to the lack of funds and the difficulties of working with the PRS. For example:

'Very limited to the financial incentives we can offer landlords in PRS... Sourcing affordable single person accommodation is becoming increasingly more difficult. Landlords are also more reluctant to work with LA's than ever before'.

Figure 25: Prevention resources (N=22)



5.38 Another respondent was concerned about what would happen when transitional funding is removed:

'With the support of transitional funding we are able to provide a number of flexible reasonable steps, however without this it will be harder to discharge duties and trial support to see what works'.

5.39 One further respondent felt that wider cuts had made things more difficult as *'Third sector funding has been cut and as such partners have also had to cut their services'*.

5.40 Feedback from service providers echoed the local authority survey responses. Many felt that the fund for preventing homelessness was insubstantial, *'the funding element to prevent the homelessness is quite limited'* (LA, A2).

5.41 Several service providers commented that successful prevention work and tenancy support would have significant ongoing resource implications:

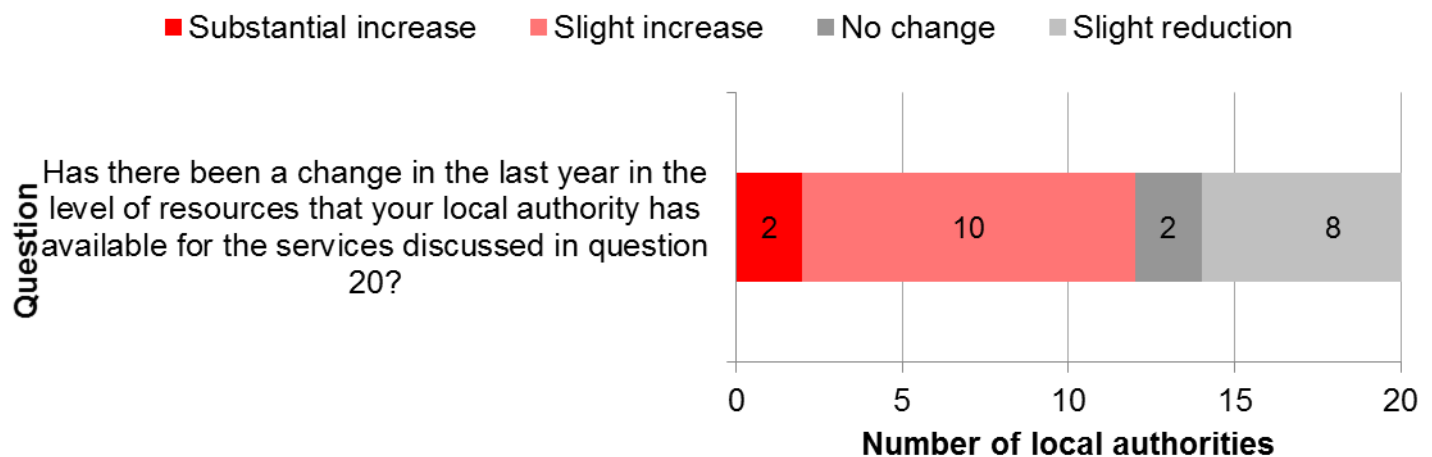
'I think the more the Government want to push forward preventiveness, they have to supply the funding in order to get the agencies on board, otherwise, it's not going to be feasible.' (RSL, A3)

'I mean it's reasonable for us to say, 'Okay we'll pay £500 rent arrears but if they've got 3,000 rent arrears and you say well sorry we can't pay 3,000 for everybody our money pots would've gone and they think well that's not reasonable to do that, you know, so yes, it's a balance.' (LA, A1)

Resources for help to secure

5.42 When asked whether there has there been a change in the last year in the level of resources available for these services, two respondents to the local authority survey stated that there had been a substantial increase, and ten a slight increase, two reported no change, while eight perceived a slight reduction. The two authorities reporting a substantial increase both explained this in terms of transitional funding. Five of the respondents with a slight increase also put this down to transitional funding, which has been used to *'fund the implementation of a Social Letting Agency'*; *'help clients into settled accommodation'*; and *'been key to delivering some additional dedicated money advice and PRS work'*.

Figure 26: Changes in local authority resources to offer Help to Secure services (N=22)



5.43 Two local authorities perceived a slight increase through Supporting People funding, with resources being made available for the *'Remodelling of SP services'* and *'SP funded posts'*. One respondent explained the change through the Social Housing Grant, which it is argued *'enables more affordable housing, easing the burden of demand on the Common Housing Register through more lettings'*.

5.44 Transitional funding was also the main explanation for those respondents that perceived a slight reduction, with four referring specifically to a reduction or no addition to transitional funds. For three of these authorities, this was combined with continued pressures on local authority finances. One respondent stated that they have *'one member of staff less'* but did not explain why.

5.45 Thirteen local authorities reported significant problems due to limited resources, while nine did not. The most frequently cited problem was insufficient staff numbers/too high a volume of work for staff to complete (five local authorities). For example:

'Increase in work/caseloads has meant that officers are more and more reliant on the assistance of support workers to assist customers with the actions in their personal housing plans. The lack of resources has made this difficult and cases have been slow in progressing'.

5.46 One of the five added that this had resulted in *'high staff turnover and inability to make longer term plans'*.

5.47 Four local authorities referred to increased demand and/or lack of available accommodation to meet it. For example, one stated that *'Bed & breakfast / Emergency Costs have increased significantly due to higher demand for services'*. Two respondents stated that they are not always able to provide financial assistance due to limited resources. Of those local authorities not reporting difficulties, two commented that there are sufficient resource in place currently, with one specifying that this was due to *'the Welsh Government's grant allocation'*. Another suggested that the change had been *'Only with the opportunities within the PRS'*.

IT infrastructures

5.48 The infrastructure in the six case study sites varied in terms of the current systems for collecting, managing and sharing data. Some service providers talked about the IT systems that they used for data management, and considered that the implementation of the Act had presented a missed opportunity to standardise and streamline systems for all authorities across Wales. In the words of one service provider, *'I don't know why they just didn't invest in some money in getting one system for Wales so that we could, you know, do it easily'* (LA, A1).

5.49 It was suggested by some service providers that a nationwide system could have helped authorities to keep data *'in the same way'* thus benefiting the collection and analysis of aggregated data. Currently this is not straightforward or easy as *'most local authorities have got different systems'* (LA, A1). Whilst some respondents reported a lack of appropriate systems, *'there's no case management system'* (LA, A3) and some were in the process of updating systems.

5.50 Some service providers indicated that their authority had made changes to the existing IT systems in preparation for the implementation of the Act, with one respondent noting how their *'way of recording data hasn't been the best'* (LA, A3). The benefits of new systems

varied and some older systems remained in operation as one respondent noted how the existing system did not *'quite fit'* with the data management demands created by implementing the Act. The demands on time in relation to working through the casework process integrated on the IT systems was noted as being an obstacle to efficacy. Several service providers reported how they adapted existing systems but continued with others means of recording:

'We adapted [our IT system] to use for the section 66 and section 73s...but we can't get reports very easily out of it so we still kept with our register and our spreadsheets for recording things'. (LA, A1)

5.51 Despite systems that complied with data protection and enabled data sharing, human error was cited as resulting in issues for data recording and management. Several service providers across sectors and case study areas noted problems in this regard:

'I was working with someone for over 12 months, and we'd been into the council, I can't tell you how many times with different things and trying to get her housing and every time we went in there the last appointment was not documented, they lost the housing form three times.' (TS, A6)

5.52 Being able to access information was highlighted as being problematic by some service providers. One RSL participant reported having limited access to a shared system, and not being able to see all of an individual's case notes. RSL service providers described relying on Housing Solutions to provide or record the relevant information but illustrated the problem of intelligibility where any relevant context to decision-making was not always provided in case notes:

'We do have access to the homes database so I can see notes written by the Housing Options team - some of them, not all of them - and I can kind of follow a case, but yes, sometimes decisions might be made internally and it's not very clear for us to understand why somebody has been moved from one to another perhaps'. (RSL, A4)

5.53 Service providers considered whether the issue was *'a data protection issue that needs resolving'*; but described how *'sometimes we're working blind on cases'* (LA, A2). The way in which more holistic, and comprehensive data sharing practices could result in a better experience for the service user was raised in terms of an individual only having to tell their story once, rather than having to repeat the details of their situation in each interaction with service providers.

5.54 A small number of service providers described their organisation's current IT systems as offering an improvement in to the administrative demands of their role. In addition, several service providers noted how new computer systems were being developed or implemented at the time of the fieldwork interview. In the words of one local authority service provider: *'we're in the process of having a new computerised housing register. All singing, all dancing'* (LA, A3).

Benchmarking, statistics and monitoring

5.55 Local authorities perceive that the number of reviews and appeals has decreased over the last year, primarily due to increased work with households in the early stages following presentation, but also due to working informally with Shelter Cymru. Overall, local authorities also consider the number of successful reviews and appeals to have decreased over the last year, primarily due to their own better decision making.

5.56 Fewer local authorities reported changes in how they monitor the impact of the Act on service users, and there are still a number of local authorities that claim not to have arrangements in place to measure outcomes for people receiving help under Part 2 of the Act. However, over a third of local authorities have reportedly changed how they use outcomes data in the last year, largely to inform service delivery. There appears to have been an improvement in the monitoring of withdrawn applications in the last year, which suggests that their knowledge in this area is increasing.

5.57 Several service providers considered the process of collating statistical data for the Welsh Government to be onerous. In particular, resources, in terms of staffing and time, were identified as requiring a significant commitment with one respondent noting that each quarterly return took two members of staff to complete over two days. A service provider working for a local authority noted that it was thought that the IT system that they had was effective at *'pulling out the correct information'* but that the *'WHO12 doesn't reflect how much work is done'* (LA, A5).

5.58 The demands on local authorities in terms of the increasing numbers of people presenting as homeless was identified as having an impact on producing the quarterly statistical returns to Welsh Government and the process of benchmarking. Local authority service providers suggested that there was little time to compare performance or learn best practice from other authorities:

'We don't do a lot of benchmarking, do we? We're just so tied-up on the treadmill in getting the work done because people are basically flat out, aren't' we? We're all flat-out.' (LA, A1)

5.59 As is noted in other chapters, some service providers felt that the preventative work undertaken was not always captured effectively. Others illustrated ongoing issues across local authorities with one local authority service provider stating that there were '*anomalies*' when looking at data across authorities, and another describing omissions as much of the preventative work undertaken is not recorded anywhere. For example, data could sometimes be missing:

'If one of our tenants burns their house down tonight, technically that person is homeless and they could present and need to be assisted. However, because it's one of our tenants, then we would just assist them.' (LA, A3)

5.60 One RSL service provider described how much of the work to capture data was '*done manually*' as '*the existing IT system is so inefficient*' (RSL, A3). Using the example of groups of people with protected characteristics, this participant noted the restrictions in place currently in terms of looking at specific sets of data:

'Similarly, requests for reports, for example, protected characteristics... If we look in to ensure that our allocations are done fairly and we're not excluding groups; we're not able to pull that data. We can pull the data when somebody is allocated a property and becomes our tenant; but if you're looking at the waiting list, or even homelessness presentations - up until now, you wouldn't be able to pull that off.' (RSL, A3)

5.61 Some local authority service providers considered that benchmarking was not possible due to the lack of consistency across authorities in terms of recording and defining activities:

'There's no recent benchmarking and we know full well that we can't compare. Nothing has changed on that front because we did prevention before and the Welsh Government accepted you couldn't compare because there wasn't clear enough definition about what prevention was and how people were recording it. Nothing has changed.' (LA, A2)

5.62 Others raised concerns about the potential impacts of people completing the statistical returns differently and the tension that can result from different interpretations of the Act by different authorities:

'We've had a case recently with another local authority where they'd accepted a 73 and we were, like, well, it would still be on a 66 with us! So, there's certainly inconsistencies in the interpretation of the act, without a doubt.' (LA, A3)

5.63 Local authority service providers explained that due to the varied geography of Wales, that it would be very problematic to compare rural, urban and coastal authorities, each which have different presenting needs and varying types/levels of housing stock:

'Because even a rural authority that you're looking to benchmark with, if they're got their own stock that puts another dynamic on it. So, it's not really that useful.' (LA, A5)

5.64 Another issue raised by local authority service providers was that one individual could be recorded in multiple ways; for instance, up to three times *'because you have to record the number of section 66 duties you pick up, the number of section 73s, the number of section 75s'* (LA, A5). Put simply by one respondent, the requirements for reporting were considered to be *'confusing'*:

'So many bits of it are based on the presentations during that quarter, then other parts are due on outcomes, which could be from cases in other quarters. We find it confusing and we're dealing with it on a daily basis' (LA, A3).

5.65 It was noted by some local authority service providers that particular sections of the data in Stats Wales were useful: *'I think its number of people who presented, the age categories is good. I think successful outcomes, unsuccessful outcomes'* (LA, A6). A cautionary note was made in that *'successful for us might not be successful for the individual'* (LA, A6). However, from a business perspective, *'obviously strategies need some statistics to help guide'* and, as such, the statistical returns were seen as providing the foundation for strategy and decision-making.

Code of Guidance

5.66 In the survey, almost all of the local authorities indicated being confident that they are compliant with the Act. Ten local authorities reported that they are very confident, 10 quite confident, and two neither confident nor unconfident. Perhaps due to this confidence, only one local authority reported a change in the last year in how they use the Code of Guidance. The change was explained as a result of the introduction of a common housing allocation policy in July 2016.

5.67 Those local authorities which were very confident attributed this to the knowledge and commitment of staff and in-house advice offered through Shelter, along with a lack of legal challenges. Two LAs referred to the training available for staff. For example:

'Since the introduction of the Act our service has created an in-depth training package for staff to include legislation and procedures. This has been adjusted taking into account guidance, information obtained from audits and appeals'.

5.68 Those respondents to the local authority survey who were quite confident again referred to training (two local authorities), including case file reviews, a new IT system, and a low number of challenges. Two respondents cited the Code of Guidance. For example *'we refer to the code of guidance on cases but there are still some grey areas'*. One local authority explained their answer through restructuring of the Housing Options service that has taken place *'to be able to deliver the service in line with the Act'*. Nevertheless, three respondents suggested that their teams do not always send letters out when they should. For example:

'Due to the high level of bureaucracy involved in the number of letters needed at each stage, we are not always hitting the level of compliance that is necessary... The number of letters necessary has in some cases been very involved, time consuming and unnecessary from a customer's point of view.'

5.69 One local authority that gave a neutral response explained that they are struggling to comply with the number of letters required with only a *'small team of officers to deal with the new legislation'*. The other local authority referred to the newness of the legislation, pointing out that *'interpretations etc. [are] largely untested by way of case law'*.

5.70 Local authority service providers across case study areas gave mixed responses in relation to the usefulness of the CofG with most local authority staff stating that they used it, and just a few individuals admitting that they did not. The size of the CofG was commented upon (*'it's big, I mean it's big and it's complex!'* LA, A6) and also in terms of how officers used it; for example, one respondent said *'it's too big to read it all through so you just dip into it'* (LA, A1).

5.71 Several service providers reported finding the Code of Guidance (CofG) to be helpful in providing clarity in terms of understanding the policy intention of the Welsh Government when the Act was introduced. Many service providers talked about how they used the CofG and felt that it was useful as a reference (which was the intention for its use) whenever necessary as a *'companion'*, an essential tool. *'Yes, it is useful and we do use it an awful lot. We do, yes.... As a reference point, yes.'* (LA, A3). Indeed, the value of the CofG was that it helped give confidence in practice, particularly in situations where the local authority could be subject to challenge.

'It's good for us, because when a lot of us are challenged, we always refer back to the Code of Guidance. You know, to make sure we're doing it correctly, because we don't always do it correctly, I don't suppose. We do go back to it quite often, if we feel that there's a decision that we can't come to together.' (LA, A3)

5.72 Service providers in other authorities explained that the CofG was not used with such great frequency in their area any longer, as the team was ‘so person-centred’ which influenced daily working practices to the extent where the guidance was no longer needed:

‘I suppose, we don’t tend to use it so heavily anymore, because we’re so person-centred focused, so our intention isn’t to find a loophole that we can make them intentionally homeless, or trip somebody up, ‘Oh, yes, we can get rid of that client.’ (LA, A1)

5.73 Therefore, the CofG helped LA staff clarify and validate their interpretation and application in real world situations. In addition, it was seen as enabling a more consistent approach across all the authorities: *‘It’s useful to have consistency across Wales’* (LA, A5). Several service providers spoke about the value of the CofG when looking at intentionality or local connection in terms of checking their own interpretation and application in specific cases. It was also described as having value as support when liaising with RSLs on behalf of service users:

‘It’s handy, it’s backup for you. I’ve used it against social landlords to get them to do what they’re meant to do’ (LA, A1).

5.74 As suggested above, the size and length of the CofG was thought to be rather off-putting by local authority service providers who indicated that it could be improved if it was accompanied by shorter summaries detailing any legislative changes that had come about as a result of the Act:

‘Just an example, you know, like with credit cards, if they change terms & conditions, they send you a leaflet with the new terms & conditions, and then there’s another insert saying, ‘These are the changes we’ve made.’ There was none of that.’ (LA, A3)

5.75 However, some service providers felt that that despite the length and detail of the Cof G that some issues were now less clear:

‘Bearing in mind [the CofG] is a few hundred pages, it’s a very long document... Local connection has now suddenly gone all vague...it’s so subjective. It is, like, a typical example is local connection because there’s no strict guidelines like there was under the old legislation. You read it and you think, well, my interpretation would be different to yours’. (LA, A3)

- 5.76 The issue of differing interpretation was considered by respondents across the local authorities to be problematic leading to some authorities implementing the provisions of the Act in a rather 'loose' fashion as *'people can put a negative spin on and perhaps go in a different direction to what the legislation is actually aiming at'* (LA, A5). Others noted the lack of case law as being problematic as one respondent noted *'I find it really hard because we don't have Welsh case law'* (LA, A4).
- 5.77 The lack of consistency and standardisation was commented upon in terms of how local authorities interpreted and implemented the CofG as *'every authority has a slightly different take on it'* (Third Sector, A2).

Training and education

- 5.78 Training was discussed in relation to its timing, content, quality and usefulness by service providers across sectors and case study areas. There was a clear divergence in the amount of training service providers received depending on whether they were local authority, RSL or third sector. When the Act was introduced, training was available from the Welsh Government, and a local authority service provider described how they, along with a colleague, completed two-day training and that both colleagues then trained colleagues in their organisation:

'It was basically down to [X] and myself, wasn't it, to make sure that staff were trained, you know. We did all the training because Welsh Assembly did offer the training, two-day training course because all the paperwork had to be sorted out, you know, what standard letters did we need? Who did we need to inform of what was happening? Get the word out that legislation was changing to all the partners, that sort of thing.' (LA, A1)

- 5.79 This two-day course was described as 'very good' and 'thorough'. Although it is not clear if other research participants in the service provider consultation were talking about the same training, sessions delivered by trainers in the very early stage of the Act were also described as *'patchy'*, *'poor'* and too theoretical. One service provider noted that *'people delivering the training couldn't answer some of the queries, which was quite poor, really'* (LA, A3). In addition, it was noted that the Code of Guidance was only available in the *'final bit of training,'* and training and education could have been better *'in the early days'*. In agreement, a service provider in a local authority noted that *'I attended a training course in January or February and the implementation was a couple of months later. So, it came a bit late in the day, and so did the guidance'* (LA, A4).

5.80 In some areas it was considered that more training and education could have been delivered to non-statutory partners as noted by both local authority and third sector service providers:

'Possibly could have done more with the support providers and the third sector in terms of explaining to them the new act and the use of private sector accommodation but that probably is something that we're trying to address now.' (LA, A2)

5.81 In one focus group of third sector frontline workers, it was noted that no training was provided before the Act was introduced, *'no training at all. You'd just read, yourself'*. These service providers – managers as well as support workers – were incredulous that they had not received any training at the time that the Act came into force. Thus, the experiences of training showed little consistency, although it was found that Housing Solutions staff generally had received training at the point of implementation. Conversely, the experiences of two representatives from an RSL were very positive as they had undertaken early training in conjunction with the local Housing Solutions team.

'The strength side of it is when we did have the training over there we were with the Housing Options team. Because we work that closely with them we were sitting with them, we were discussing it. We were going through what we thought were the pros and the cons.' (RSL, A3)

5.82 One local authority service provider described how they took an in-house approach to addressing ongoing training needs by enabling an outreach worker to deliver training on the processes involved with implementing the Act. This was then cascaded to other staff who have *'instruction and training on the Act itself'* (LA, A2). Service providers based in larger third sector agencies also depicted an approach to continuous training with one noting how *'we are in quite a good position at the moment that we have a very comprehensive training'* which had been designed with relevance for *'each role in the organisation'* (RSL, A2). This demonstrates contrasting experiences of training across local authorities as well as across sectors

5.83 The issue of funding for training was raised by service providers and several noted that that there were ongoing training needs particularly as there were lots of other legislative and policy changes, such as the introduction of Universal Credits and the Social Care and Wellbeing Act for example.

Summary

- 5.84 In the local authority survey, 15 local authorities stated that arrangements are in place to measure outcomes for people receiving help under Part 2 of the Act, and seven that they are not. Those local authorities that have arrangements in place stated that they continued to collect data in much the same way as under the previous WHO12 return (the quarterly data return in place prior to the Act). Four respondents referred to additional data, although this varied between local authorities. For example, one local authority only collects additional data in relation to B&Bs, and two utilise Supporting People outcomes data, while in another local authority *'Internal weekly and monthly monitoring forms part of the council's core data requirements and performance indicators'*. A further three LAs said that they are currently considering how to better measure outcomes, including an *'improved IT system to register, monitor and track service users'*.
- 5.85 Over a third of local authorities have reportedly changed how they use outcomes data in the last year (eight authorities), while 14 stated that there has not. Six of the LAs reporting a change referred to the data being used to inform service delivery, either through review of cases, training, or innovations, or even re-modelling of services. For example, one respondent stated that *'it has enabled us to remodel services and put resources where they are required most'*. The remaining two respondents simply stated that the data is now maintained in a *'new database'* and that they have *'incorporated the Supporting People outcomes data as additional information for outcomes under the new Act'*.
- 5.86 Fewer local authorities reported changes in the last year in how they analyse outcomes data, however. Five respondents stated that their local authorities have made changes, while 17 stated that they have not. Those LAs that reported changes commented on how the data was more comprehensive, collected more regularly, and how analysis fed into future planning of services. For example:
- 'Data is used more widely to monitor trends and understand impact of the new act and to modify and improve service delivery'*.
- 5.87 There appears to have been an improvement in the monitoring of withdrawn applications in the last year. As with the first wave survey, only one authority strongly agreed with the statement that they have processes in place to follow up withdrawn applications. However, seven authorities indicated that they agree (compared to four in the first wave survey). Eight offered neutral responses, four disagreed (compared to nine in the first wave survey), and two strongly disagreed. As such, knowledge about those who withdraw

is seemingly increasing, along with information on whether they require further support and whether particular equalities characteristics are over-represented or not.

- 5.88 The usefulness of sending letters at each stage of the process was questioned by some service providers the value to service users was seen to be limited as the content was not always easily understandable - but there was a recognition that to not provide such communication exposed Housing Solutions Teams to legal challenge. It was also felt that the increased workload and time spent in producing such paperwork took staff away from working with service users.
- 5.89 Local authorities are confident that they are compliant with the Act. The Code of Guidance was perceived to be a useful but unwieldy document. Service providers use it as a reference resource to ensure compliance with the Act. Some service providers suggested that any amendments should be clearly indicated to make it more user-friendly.
- 5.90 Training was discussed in relation to its timing, content, quality and usefulness by service providers. There was a clear divergence in the amount of training service providers received depending on where they were based (statutory, RSL or third sector provider) and the level of skills service providers have. Since the introduction of the Act, service providers now need to have skills in negotiation, motivational interviewing, mediation, and empathic practice. Arguably this differs from the previous legislation where the focus was on assessment. There was evidence that skills among staff varied across and within local authorities and also within teams. The impact of staff not having the appropriate skills can be detrimental to service user experiences.

6. Partnership Working

Introduction

- 6.1 This chapter presents the findings from LA survey and service providers in relation to partnership working. Part 2 of the Housing Act (2014) puts an emphasis on partnership working across organisations and services to provide sustainable solutions to homelessness.
- 6.2 There was variation across and within the case study areas with regard to the extent of the changes brought about by the Act. Some service providers felt that partnership working was already taking place, but that the Act provided a more formalised framework in which to operate:

'To be fair some authorities were doing basically what the act has said before the act came into practice... I would say its maybe gone up a gear since the act came into force that sort of collaborative working has gone up a gear.' (LA, A2).

- 6.3 Others felt that the Act had made more significant changes, facilitating better partnership working within and between local authority departments which was seen as a necessary foundation for working with other agencies. It was evident that for some service providers there were challenges within the local authorities (between statutory services) and also across sectors /agencies:

'A lot of the work we're doing is trying to just make the council more joined up, let alone anything else' (RSL, A2)

- 6.4 The chapter is structured under the following headings: partnership working with local authorities; Social Services; Adult Services; Health services; Police; Prisons/ Youth Detention Centres; Supporting People; The use of Gateways; The third sector; RSLs; and the impact of other government agendas.

Partnership working with local authorities

- 6.5 In the local authority survey six respondents reported a slight increase in partnership working with other local authorities, 15 no change, and one a slight reduction. Of those reporting a slight increase, two referred to Homeless Network meetings, which it was felt helped them 'learn from other [local authorities'] experience and best practice and share ideas', and also '*included sharing training, helping with local connection cases*'. Two further respondents referred to regional meetings²⁶, which '*are now in place, forming good*

²⁶ Although the regional meetings were not specified.

links'. One further respondent referred to *'reciprocal arrangements agreed on complex cases'*.

- 6.6 Only two respondents reporting no change offered an explanation. In both local authorities this was due to already having good links in place. The respondent reporting a slight reduction put this down to lack of capacity:

'Due to capacity issues we don't meet up for regional meetings and sharing of best practice or service experience as routinely as we would in previous years. More time can be spent however reacting to issues with neighbouring authorities and relationships are very positive. Would like to collaborate more but not always possible'.

Within local authorities

- 6.7 Some local authority service providers reported that relationships and partnership working to prevent homelessness with Housing Benefit had improved since the Act. A positive example was given in one authority where a budgeting officer worked directly with Housing Solutions staff:

'I think we have a good relationship with housing benefit. They'll work with us to try and prevent homelessness as far as possible' (LA, A4).

- 6.8 Some authorities had tried to create more formal systems to facilitate partnership working, creating forums which brought together various partners across the local authority to focus on services for young people, women, and older people:

'[T]he project board are generally internal but they're from all sections within the council. You've got social care coming along, you've got somebody from health coming along, and I know we should have had that previously because you had Supporting People planning groups, but they weren't well attended and fell apart if you like in the early days' (LA, A2).

Social Services

- 6.9 In the local authority survey half of local authority housing teams reported increased partnership working with Children's Services (three authorities reported a substantial increase, eight a slight increase), making this one of the areas with the biggest increases in partnership working across Wales. Seven authorities reported no change, three a slight reduction, and one a substantial reduction.
- 6.10 Two of the local authorities reporting substantial increases in partnership working with Children's Services attributed this to having a dedicated officer working across Housing Options and Children's Services. In the third local authority, partnership working took

place more through workshops and the planned housing gateway. Four of the local authorities recording a slight increase already had initiatives in place including a Young Persons Positive Pathway, CIN meetings and joint assessments, but there has been more focus on these or they have been supplemented with further initiatives. For example:

'Partnership work with children's service has been ongoing since the introduction of gateway of housing provision for young people to follow regardless of whether the council have a homeless or a children's services duty. This increased more last year with the introduction of tenancy training and the move into training tenancies for social housing'.

- 6.11 Other responses from those reporting a slight increase varied and included a specific focus on 16-17 year olds (one local authority); utilising a specialist Social Worker/Accommodation Officer (one local authority) and co-location of the Youth Homelessness Team with the Care Leavers' Social Work Team. Those authorities that reported no change explained that this was due to already having good partnership arrangements in place.
- 6.12 Two of the respondents to the local authority survey reporting a slight reduction referred explicitly to the Social Services and Well-being (Wales) Act 2014, and the Children's Services' focus on this meaning that they were not engaging with housing. For example:
- 'They have been busy implementing the 'well-being' Act so we have been unable to get them to engage with us'.*
- 6.13 One local authority stated that restructuring Children's Services and the associated removal of an entire team has made it difficult to engage. However, the fourth local authority reporting a substantial reduction had plans in place to increase engagement with Children's Services centred on *'multi-agency update meetings to discuss a plan for move on'*.

Adult Services

- 6.14 The majority of local authorities reported no change in partnership work with Adult Social Services (14 authorities). However, more reported an increase (one a substantial increase, five a slight increase) than a reduction (one a slight reduction, and one a substantial reduction). The substantial increase in one local authority was explained through plans to have Occupational Therapy and Social Work included in the team. Four of the five local authorities reporting a slight increase focussed on increased collaborative working, including an *'increase in POVA & joint assessments'*. For one respondent the

change was positive, with *'better collaborative working in recent months'*. However, another respondent was more cautious:

'Trying to work more due to complexity of cases and need for support. Not always forthcoming but we are asking the questions and making every effort to work with Adult Social Services. Offering to host colleague from Adult Social Care in our offices a day a week to strengthen front line relationships and joint case management'.

6.15 Of those local authorities offering an explanation for no change, this was due to *'good links already established'* in one LA, while another was still *'trying to establish other links'*. The respondent reporting a slight reduction explained that Adult Social Services were *'too focused'* on the Social Services and Well-being (Wales) Act, while there was an acknowledgement that *'links need to be formed with this service'* from the respondent reporting a substantial reduction.

6.16 However, two local authority service providers described difficulties in working with Social Services, particularly Children's Services. The issue appeared to centre on a lack of understanding of the remit of service provision and an unwillingness to share information.

'There has to be a joint assessment if they're a young person. It's coming together. It's difficult sometimes to get agencies to work together because sometimes people can be very protective can't they of what they do, like mine, mine, mine, you know, I'm not sharing.' (LA, A1).

6.17 In one area, local authority service providers noted *'we seem to be at loggerheads with them all the time about putting children into temporary accommodation'* (A4). In particular, they described the different approaches staff in the different agencies took to children about to reach the age of 18, some agencies refused to open a case under six months before someone's 18th birthday, whereas housing services would treat someone as a child up until the night before they turned 18. In another case study area, tensions were caused more by the lack of housing. Local authority staff felt that Social Services and the courts had little understandings of the Housing Act itself or the shortage of available housing.

6.18 From local authority service providers there were mixed responses in relation to partnership working with Social Services across the six case study areas. Sometimes, the relationship with Social Services was perceived as being better than that with Health Services. Services focused on children or older adults were more likely to be working well with housing and homelessness:

'I feel I work very well with Children's Services. They share information and do joint assessments and there's good contact there' (LA, A3). As a local authority service provider commented, '[W]e certainly are doing that much more than we used to and it is all to do with both the preventative agendas, both in social care and in housing ... we do a huge amount with children services now' (LA, A2).

6.19 It became clear that service providers across sectors and case study areas felt that there was some conflict between the different agendas. A number mentioned the Social Care and Wellbeing Act, which was generally felt to be a positive step, but needed more 'connecting up'. As one RSL service provider commented, *'I think housing should be an equal partner and very often we're not because at the end of the day, we go into the homes, we allocate the homes and where there's a lot of safeguarding issues, other people have seen things but, you know, you need a framework, don't you, for joint working' (RSL, A1).* Another RSL provider reiterated this point, *'We all seem to be working off different, the theme is the same isn't it, but we're all doing our own thing, homelessness, social services' (RSL, A3).*

6.20 In several case study areas, local authority service providers expressed frustration that Social Services felt that rehousing someone meant that their case could be closed. As one explained, people's needs are not reducible to housing, there is often a need for ongoing support for the tenancy to be sustainable and to prevent future homelessness:

'[I]t's pointless putting a roof over somebody's head if it's not suitable or meets their needs. It may shelter them from the rain and things, but it doesn't actually allow them to flourish and function and I think that's the problem and I think it's getting that understanding over, that we've got limited availability and we could be setting somebody up to fail as soon as they're out of social care services' (LA, A6).

6.21 For RSLs, the reduction of support provided once someone was housed was also reported as being particularly frustrating as a lack of adequate intervention from Social Services could result in an unnecessary eviction.

We do have support services, the general feeling from our side is that Social Services are quite poor at engaging with us and we might have tenants, for example, we're having to take legal action now against a tenant who has, well she's an alcoholic, she also has a younger mental age and issues with maintaining her tenancy'. (RSL, A1).

Health

- 6.22 Given the increasing issues with mental health, particularly when compounded with substance misuse, the need for improved engagement with Health and Mental Health Services was raised as a significant issue across all of the authorities by service providers from all sectors. Health services were also the statutory housing services reported finding the most difficult to engage with. This was thought to be partly due to a lack of resources/staffing through budget cuts and the unwieldiness of provider organisations:

I just think they're a big beast and very difficult to penetrate. I think they've got an agenda which is based purely on health ... they just don't engage. They haven't got the staff they used to have either, none of us have, so it is really difficult. (LA, A6)

- 6.23 Historical ways of working which were not partnership orientated were also thought to negatively impact on current service operation. Some service providers felt that they had limited knowledge of the remit of other organisation's operation and vice versa:

'Health view housing as something very different to what they do... we are in a silo and we do health, and you do housing over there. There is a lack of understanding that actually there is a massive link.' (TS, A2).

- 6.24 However, some service providers, although acknowledging wider structural constraints, highlighted that individual relationships (and behaviour) played a significant part in people's ability to access services:

'I guess it's like any organisation, some individuals are better than other individuals. ... it's about getting a good relationship with particular core people and then if needs be, using those core people to get - I'm sorry but that's the way it is!' (LA, A5).

Hospitals

- 6.25 From the local authority survey, more than a third of local authorities reported increased partnership working with hospitals. More specifically, three reported a substantial increase in partnership working with hospitals, five a slight increase, 12 no change, one a slight reduction, and one a substantial reduction. In two of those local authorities reporting a substantial increase in work with hospitals, this was due to having staff based in the local hospital, while in the third the focus was on *'regular meetings with regards to discharge from Mental Health'*. One of the authorities with staff based at the hospital stated:

'We undertake housing options and homelessness interventions in the hospital setting to support customers to return home or to alternative accommodation in a much more structured way'.

6.26 Two of the respondents to the survey reporting a slight increase also referred to having staff based in hospitals to support the transition. However, all five referred to procedures in place for discharge. For example:

'Better protocol in place for hospital discharges. Better communications with mental health services and Occupational Therapy Teams to aid discharge process'.

6.27 Three of the local authorities reporting no change explained their responses in terms of already having a protocol or good relationships in place, for example hospitals referring directly to the housing team, phone applications, and housing officers visiting hospitals. However, one authority reported having *'no links with hospitals'*.

6.28 Those respondents from the local authority survey reporting substantial/slight reductions both voiced concerns about the working practices of health professionals in their local authority areas. In the case of the respondent reporting a slight reduction, this was seen as placing additional pressures on the housing team:

'There are concerns over how health professionals from various hospital settings discharge individuals with limited information being provided or pre-planning. This places a huge burden on the department and in some instances individuals sent to ourselves have significant care and support needs that go beyond the remit of housing'.

Police

6.29 Service providers across sectors and case study areas reported a degree of partnership working with the police. A number of local authorities had good working relationships and were working to improve their relationships with probation to better support prison leavers. RSL staff also found the police supportive:

'There's good partnership working with the police as well, so if somebody's causing anti-social behaviour and at the risk of losing their tenancy that way, there's a lot of early intervention steps they're taking at that level' (RSL, A3).

6.30 For some, service providers (across sectors) work with police was already occurring through meetings taking place under other initiatives such as Multi-Agency Risk Assessment Conference (MARAC) around individual cases of domestic violence or abuse. One area had convened a regular meeting around specific issues of substance abuse, and police were working to support Housing Solutions, RSL and hostel staff with information on high risk cases. However, some third sector organisations described the potential ethical dilemmas involved in such partnership working. Afraid that information

given during meetings might be used against service users by the police, they were increasingly less willing to be open during joint meetings.

Prisons/Youth Detention Centres

- 6.31 From the local authority survey, eight respondents also reported increased partnership working with prisons/youth detention centres (two a substantial increase; six a slight increase). Half of local authorities reported no change in this area, and two a substantial reduction. The two respondents reporting a substantial increase attributed this to *'better working relationships with probation and the HMP services'*, and having a *'Regional Prison Resettlement Officer now in post'*. Four of the authorities reporting a slight increase referred to better joint work and/or communication with probation and prison services. For example:

'Joint working with the YO [Youth Offending] service and prisons and detention centres is on-going and has made some slight improvements this year'.

- 6.32 One further respondent to the survey attributed the slight increase to now having a *'Prison Resettlement Officer'*. However, for another respondent the increase was not necessarily so positive, due to the *'Prisoner Pathway not being adhered to always by Prisons and/or Probation'*.

- 6.33 Five of the local authorities reporting no change explained this due to already having systems in place, including a *'PREP worker'*, prisoner pathways, and a Regional Prison Officer post. However, for one respondent, the *'prison pathways [are] not always being used'*. The two respondents reporting a substantial reduction also felt that there are issues with the pathway. For example:

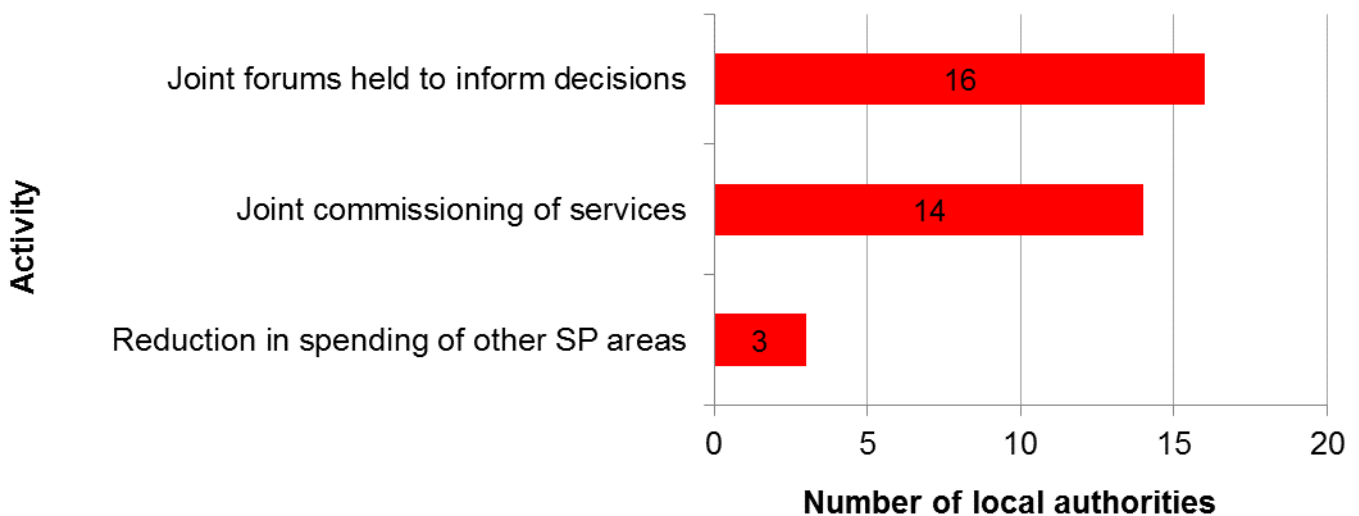
'Prison Pathway is not working! We are not receiving applications for housing help from offenders leaving prison in a timely manner, if at all. When we do, often there is no risk assessment provided and insufficient information provided'.

Supporting People

- 6.34 In the local authority survey, housing teams were asked about how their working relationships with Supporting People services have changed over the last year, including ways in which the homelessness agenda informs the commissioning of Supporting People services, the targeting of Supporting People resources to support homelessness prevention, and the introduction of gateway/formal referral processes.

- 6.35 Overall, twenty local authorities stated that the homelessness agenda informs the commissioning of Supporting People services, and two stated that it does not. This is an increase of two local authorities over the last year. More specifically, sixteen local authorities held joint forums to inform decisions, fourteen stated that the homelessness agenda informs the joint commissioning of services, and three reduced spending in other Supporting People areas.
- 6.36 Three respondents to the survey also reported other ways in which the homelessness agenda informs the commissioning of Supporting People services including *'joint planning of new accommodation and support services'* in one local authority, along with *'Working towards joint commissioning of emergency accommodation'* and attending *'Forums to inform commissioning and service delivery'* in another. In a third local authority this includes identifying the need for a support worker for people with mental health issues and complex needs, a drop-in service for young people at risk of homelessness, and a debt-advice service.

Figure 27: Ways in which the homelessness agenda informs the commissioning of Supporting People Services (N=20)



- 6.37 When asked *'How are Supporting People resources targeted to support homelessness prevention?'*, floating support was given as the most frequent response, followed by generic support service, and co-location of homelessness/Supporting People services (see figure below). Only a minority of respondents indicated that their local authority has a fully integrated service.
- 6.38 Among the local authorities stating that their homelessness and Supporting People services are co-located, this takes varying forms in practice. Four respondents stated that Supporting People is situated within housing options. For example:

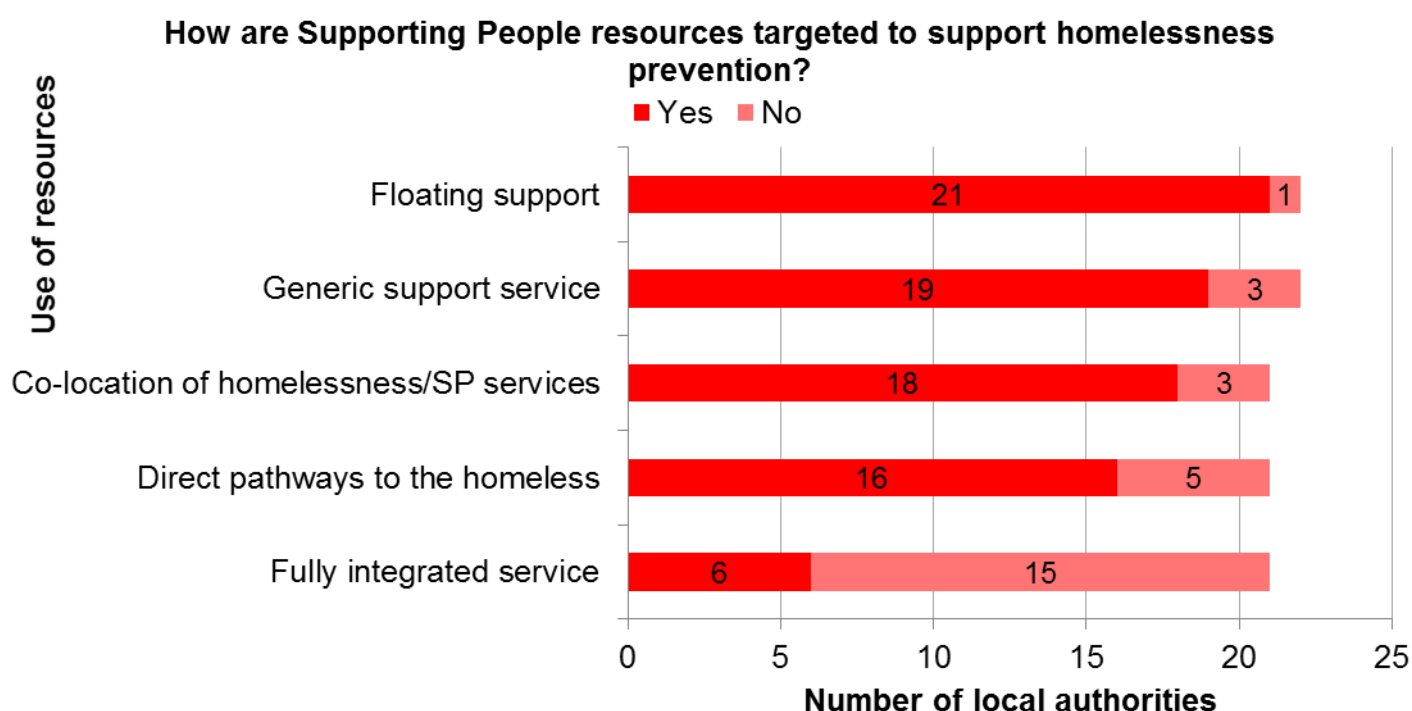
'SP team is located in the housing options centre, with homeless services, hostel and reconnection services. The head of service has responsibility for SP. Homeless and SP teams work closely to ensure practical and strategic service delivery'.

6.39 One of these respondents added that it *'improved joined up working'*. A further respondent stated that only Tenancy Support was based with Housing Options. An additional three referred to the same manager being responsible for both services, which it was felt helped them to work together. For example:

'As the Manager I have responsibility for both Supporting People and Housing Options. Teams work very closely together and are co-located'.

6.40 Three respondents referred to Supporting People funded posts within their teams. In one local authority, this was a pilot Supporting People post that *'sits within our team which works well'*. Of those local authorities which do not have co-location of homelessness and Supporting People services, one explained this in terms of having *'always worked closely with SP'*, while another stated that co-location is not currently possible in their local authority. A third, however, saw this as *'a key area for development'*.

Figure 28: Targeting Supporting People Resources to Support Homelessness Prevention (N=22*)



Note: * One

6.41 One local authority did not respond to three parts of the question.

6.42 Of those local authorities that use Supporting People resources for direct pathways to the homeless, two referred to gateways that allow homeless households to *'access a range of support and accommodation through [the] Supporting People Pathway'*. A third authority

has introduced a triage system, a Duty Officer, and a New IT system so that those becoming homeless can be immediately contacted. Two respondents explained that this was still in progress. One local authority that does not have a direct pathway explained *'We did investigate pros and cons, but [it] did not offer value for money'*.

- 6.43 In the survey responses, almost all local authorities stated that they target Supporting People resources for floating support, with only one stating that they do not. A wide range of additional information was given, however. Three local authorities referred to using a range of providers depending on specific need, with the providers being accessed through the Supporting People pathway. One local authority referred to a specifically internal service. Another stated that they target their Supporting People resources into floating support as it *'proves far more effective in terms of support provision and use of funding'*, while another stated that they saw this as *'a key area for development although we do have floating support'*. The local authority that does not target Supporting People resources for floating support offered no further explanation.
- 6.44 Of the minority of local authorities that target Supporting People resources into a fully integrated service to support homelessness prevention, four explained that this took the form of Supporting People commissioning of *'temporary homelessness accommodation provided by Housing Options'*, sharing the same manager, *'Quarterly meetings held between Housing and SP and support providers'*, and a *'SP/Homelessness Gateway'* respectively. Of those local authorities that do not target their resources in this way, two said that changes are planned, including restructuring of services. One further local authority stated that although the homelessness and support teams are separate, they are working well, with a *'quick and easy referral process'*.
- 6.45 Supporting People resources were reportedly targeted into a generic support service in a clear majority of local authorities, with only three stating that they do not use their resources in this way. A range of support services are available through direct referral routes to Supporting People funded services. In three local authorities this includes using outside organisations. For example, one authority said they *'have generic officers and will refer to outside specialists such as Gofal, Caer Las'*. One other authority reported that they are looking to remodel the services as they *'need low level responsive quick intervention'*. However, they have *'Concerns over the future of this funded project'*. In one further LA, it was reported that *'existing generic services are under review to inform future development and ensure needs are met'*. The only explanation by an authority not targeting Supporting People resources in generic support was that *'all referrals are through the Gateway'*.

- 6.46 Only two local authorities reported targeting Supporting People resources in other ways to prevent homelessness. Both stated that they use these resources for specialist support. One is planning to introduce a discrete post to *'support people with mental health and complex needs during this financial year'*, whereas the other has *'initiated a 'hot desk' facility for service providers enabling co-location of specialist support providers within the Housing Options Team'*. The first of these authorities also uses Supporting People resources to fund local authority and third sector hostel provision, and third sector provided refuge and supported housing, as well as a one-year private sector landlord liaison post in order to *'increase availability of private accommodation and support to tenants and landlords'*. Support is available in the latter authority for those who have specialist mental health issues or have been victims of domestic abuse, while the authority continues to *'promote the facility with other service providers'*.
- 6.47 Consultation with service providers indicated that the majority from Supporting People felt that their strength had always been in partnership working, and that for that reason, the Act had not had as much of an impact. They continued to work with statutory partners around joint disability contracts, worked with other SP teams and also worked closely with housing managers to improve hostel provision and tenant support. In this way, they could help connect different organisations or suggest best practices:
- 6.48 However, some service providers indicated that the Act had an impact on Supporting People, primarily in terms of allowing more flexibility around how to undertake prevention work:
- 'I think we're now working a lot more closely with Housing Options because the homeless prevention agenda has become a lot more to the fore in Supporting People as well, so I think when we're looking at commissioning and planning services we're taking the Housing Options and homelessness prevention much more on board'* (LA, A6).
- 6.49 In most cases, service providers recognised that partnership working with Supporting People services was working well. However, an issue identified for Supporting People was the range of services they were required to support and the organisations they worked with. With the implementation of different Acts, some local SP staff found it difficult to know what to prioritise.
- 'It is quite difficult in that, there seems to be different drivers at different times, which we find difficult for SP because we're being funnelled in certain directions'* (LA, A4).

6.50 As with all organisations, Supporting People providers had found the reductions in funding difficult and had had to reduce their services accordingly. This had a number of repercussions, the first being an increase in waiting times for services. As one local authority service provider explained:

'I mean, the onus is on the service user now to do a bit more for themselves, but obviously, we get a high amount of people who have got support needs and whilst we're developing great relationships with our Supporting People team and we can put the necessary referrals in, that support is not always available immediately due to their capacity' (LA, A3).

6.51 Another issue raised was regarding the process of moving people out of temporary or supported housing and into their own tenancy. In one case study area, Supporting People had reorganised their funding to exert more control over providers of temporary accommodation and floating support – *'we took control of that, we introduced a new system, all the referrals had to come through us, we set a time limit on which they could support them, and then they have to ask us if they wanted to extend that support'* (LA, A2). This also lowered the required budget by moving away from specialised to general support and cutting providers. However, some third sector organisations highlighted the potential reduction in flexibility and expertise they considered vital to successfully move someone with complex needs into a sustainable tenancy.

'Cut the numbers, cut the restriction, cut the type of support ... does this promote greater costs across a whole range of budget cuts later on, and perpetuate the revolving door cycle? ... It's hard. I have got a lot of sympathy' (TS, A2).

6.52 As indicated in the local authority survey, Supporting People services were located in different directorates across authorities, which some service providers felt had an impact on their priorities:

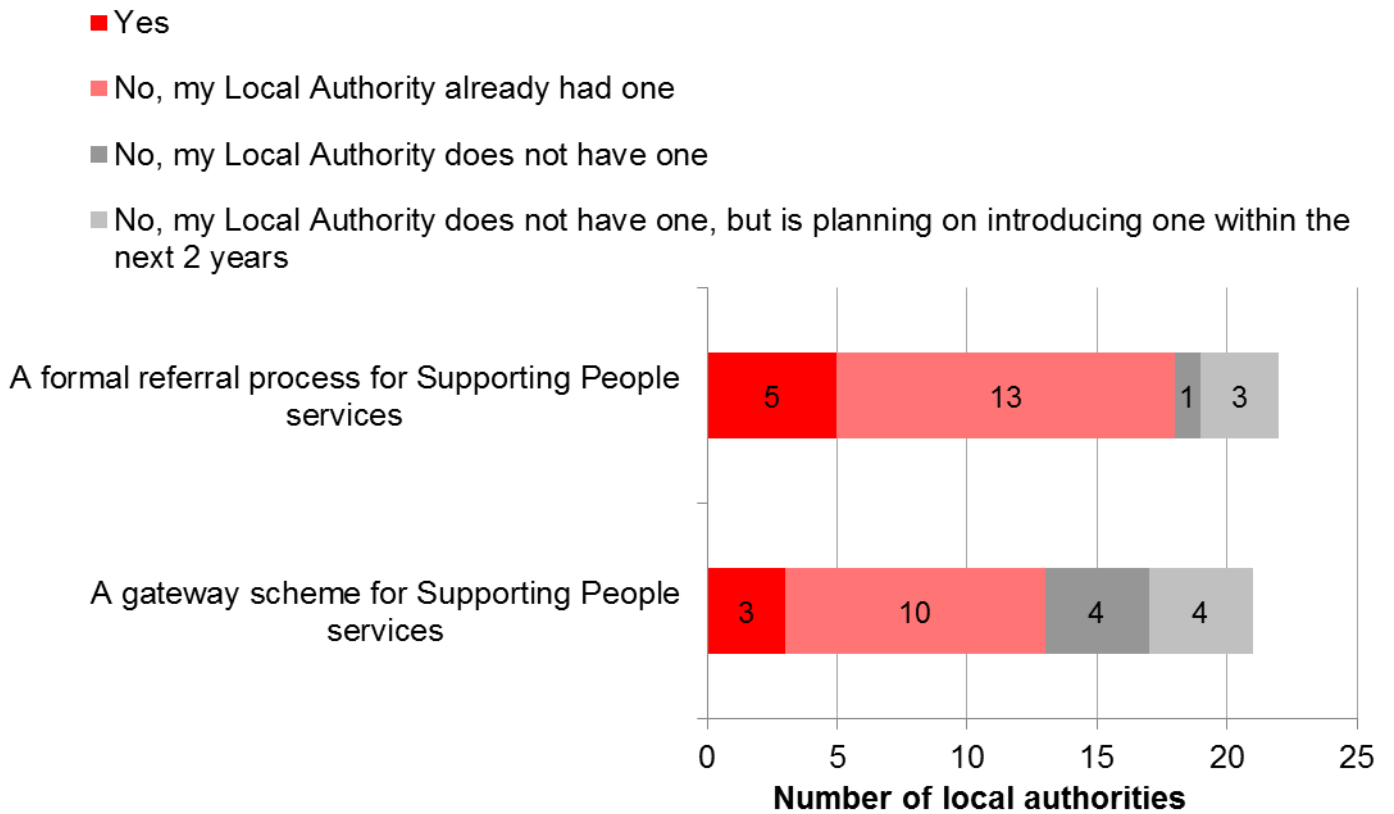
'Supporting People are based in Social Services. I never worked in an authority where they've been based in Social Services and I think, as such, what happens is that they're not really aware of what happens here [in housing]' (LA, A5).

Gateways

6.53 From the local authority survey, as can be seen in the figure below, a majority of local authorities had introduced both a gateway scheme for Supporting People services and a formal referral process for Supporting People services. However, only three had introduced their gateway scheme in the last year, and five had introduced a formal referral process over the same period.

6.54 Of those respondents to the survey who introduced a gateway scheme in the last year, two stated that in practice this facilitates access to Supporting People funded floating support. However, in one of these local authorities there is ‘a separate gateway scheme for fixed supported housing’. One local authority that already had this Gateway in place stated this was one of several extant pathways, while another noted that ‘All referrals for supported accommodation and tenancy related support are made through the Gateway’. Only one local authority that does not have a Gateway nor a plan to introduce one elaborated on their response, stating that ‘we did investigate but not cost effective’. All of those local authorities planning to introduce a Gateway had firm plans in place, with one having recently appointed a Gateway Project Officer, two about to introduce a gateway by January 2018, and one having upgraded the IT system to include the Supporting People module.

Figure 29: Gateway/referral processes for Supporting People services (N=22*)



Note: * One local authority did not respond to one part of the question.

6.55 Among the local authorities that have introduced a formal referral process in the last year, one reported introducing a single referral pathway, while two others had other referral processes for Supporting People services. One other authority reported their plan to open the gateway to other Supporting People services:

‘Longer term it is intended the Gateway service will be rolled out to all SP funded services and will replace the numerous arrangements that currently exist’.

- 6.56 Of those local authorities stating that they already had a formal referral process for Supporting People services in place, in two referrals are made through the Gateway, with a third adding that they are made to a *'central point for assessment then passed to most suitable provider'*. In a fourth LA, the process differs depending on the service, but the *'majority of referrals come through housing solutions'*. Of those that are planning to introduce a formal referral process, all three are in the development stages. For example:
- 'We have run a pilot and following evaluation we are in the process of developing a standard referral form for providers of short term supported housing'*.
- 6.57 Local authorities have been encouraged to introduce Gateways for particular issues or groups of people, such as such as single people, domestic abuse, and mental health. Consultation with service providers revealed that Gateways had been introduced in several case study areas, and were thought to offer specific benefits, since they channel all referrals through a single point of contact – *'all referrals were supposed to go through the one point. That's the main ethos behind having the Gateway'* (LA, A6). They also served to collect and share information on people who had accessed gateway services, and create new referral processes to share recommendations to help service users move on.
- 6.58 Service providers reported that gateways had changed partnerships significantly, particularly in the amount of control local authorities gained over certain services and funded accommodation. As one third sector provider stated: *'We now have a Gateway that people have to come through ...and we decide who goes in what scheme.'* (A2). However, among service providers across sectors and case study areas, opinions were fairly mixed about how useful Gateways were.
- 6.59 Some service providers felt that using Gateways meant that service users received more support:
- 'It seemed to increase the amount of intervention work that was being put in as soon as a person presented themselves to the local authority'* (LA, A6).
- 6.60 However, others indicated that the introduction of Gateways was thought to have moved authorities away from a person-centred approach as it meant that service users had to engage with a complicated process involving multiple agencies. The concern here centred on gateways actually making it more difficult for some people to access services. Some service providers also felt that it placed a great responsibility on one person, who could possibly *'make a snap decision based on information that from meetings, that that person, they haven't got the vulnerability that she thinks they have'* (TS, A6).

6.61 Another issue raised was that it was difficult to make referrals when people did not easily fit into any one Gateway. Some third sector service providers in authorities where Gateways had not yet been established, often felt their could potentially remove autonomy, and instead they would prefer:

'To keep it direct access as well, a lot of councils would like to take control, we like direct access because you can turn up here at any time, we'll take a referral off you' (TS, A3).

6.62 In the words of one RSL service provider:

'When the Gateway system was introduced and we, effectively, lost our right to choose our own tenants... it was a culture shock but it has been mainly a positive change ... agreement is that the council are responsible for filling those voids. So should they not be able to fill our voids in some occasions the financial responsibility's not on our shoulders' (RSL, A2).

6.63 For other third sector staff, this process was thought to have introduced *'a middle man for what we do and what's the advantage of it. I can't personally see what it is, and if we refer to [organisations] ... we know them very well, we can fill in the application, discuss, take them over, whereas this single point of contact, well it gets lost, they don't know the person or individual, it just seems what's the purpose of it'* (TS, A6).

6.64 This was also felt to increase in the amount of paperwork required, as they were required to fill out the gateway form in addition to, rather than instead of, the assessment forms developed by other organisations.

6.65 Only three service users referred to accessing gateways in both phases of the fieldwork and they expressed mixed understandings of their role. One respondent saw them as a separate service provider.

'I've been there since 9 November, so not very long, but I need something doing to it, because the landlord's just not doing anything, so I've come to the prevention team today. I've worked closely with Housing Options for the last three months, more with Gateway than anyone, to help me find a place.' (SU, A2)

6.66 Another service user echoed this, reporting how this additional step made it more complicated for them to access support and accommodation:

'I think, where every single bit of housing, all hostels, supported housing, everything has to go through a centralised council process, and I think it worked better when it didn't, because I'm with [a charity], and they have a room free in one of their houses,

and it would have been, a couple of years ago, that they could have just dealt with it themselves and put me I there, but now, when I 'phoned her, because I found out there was a room free there, she said, 'Oh, everything has to go through the council.' I'm back to square one again, you know?' (SU, A2)

6.67 Service users expressed frustration that the process was circuitous and time consuming. For one person, it was having to go back and forth between the hub and service organisations.

'But then I said, 'What help can I get to get a new place?' ... all they said was we'll go to the hub in town and then the hub tells you to come here, and here tell you to go to the hub ...' (SU, A2)

6.68 For another service user, long waiting times, combined with the requirement to go via the Gateway to access any services caused difficulties in receiving help when they had other responsibilities and pressures.

'So he said, 'Take a ticket.' I waited for two hours, and then I got called and they said, 'You need to go and see the next person now and you are fourth in the queue, there's four people in front of you, sorry, and on average they're taking an hour each', and so I said, 'I can't wait another four hours, I've got to get the kids', and I haven't been back yet. That was just to see if there was any agencies.' (SU, A2)

6.69 Service providers also reported being confused when there were numerous pathways in operation in an area, and it also being time consuming for them to ascertain which the correct one to follow was:

'To be honest, you get confused with all the pathways as well because the priorities for each client group are slightly different as well, and you're not quite sure. What if you've got a 17 year old, who's just come out of prison, which pathway? It has to be based on their individual circumstances and what they're presenting to you with, as their main issue. Was it about being in prison or was it because of their age? It is about sitting down and talking to them, so it's critical to get that assessment right.' (TS, A2)

6.70 It is clear in this quote that even where pathways and gateways exist, the importance of a holistic, person-centred assessment is paramount. This example also demonstrates the service provider's poor knowledge of the pathways as the Prisoner Pathway and Young People's Pathway do very different things.

Partnership working with/among the Third Sector

- 6.71 Local authority service providers acknowledged the necessity to develop improved partnerships with the third sector. Likewise, third sector staff recognised an improvement in efforts by local authorities to increase collaboration.
- 6.72 For local authority service providers, third sector partnerships were seen as a key method of managing some of the challenges regarding the complexity of issues presented by service users. Assessment, for example, was seen as one area where third sector hostel and temporary accommodation staff could support Housing Solutions:

'We've got much closer relationships with all of our accommodation providers now, and they feedback a lot more information, because it doesn't become apparent. They live with the clients, don't they? And then they tell us a lot more that goes on, so you review that reasonable step.' (LA, A2)

- 6.73 However, there were various sources of tension in these partnerships, often around maintaining communication and sharing information. There was consensus among service providers that such working relationships varied enormously, with both positive and negative examples given.

'There are some that we seem to be working better with. There are some who, despite training and trying to push training out, almost seem to be working against us at times I think it's fair to say... Sometimes communication is a problem, getting feedback from them, as to what they've done with the client. We just seem to be chasing all the time, which is not helpful to anybody really' (LA, A5).

- 6.74 Service providers broadly felt that the Act had led to improved partnership working between themselves and local authorities. This was primarily due to improved communication, and an increased willingness to help maintain tenancies, along with additional resources to make that possible. One focus group of frontline hostel workers, discussed improvements in information sharing:

'I think it has, it has got better. I think it's probably because we're more obligated to do it now because of the Act and no one's in objection to doing that anyway. It's a productive thing to do' (TS, A2).

- 6.75 There were some examples of good practice and positive working relationships between service providers. Similarly, the third sector in some authorities reported some good experiences of partnership working, particularly where it had centred on the needs of specific groups. There was significant evidence that such arrangements were successful

because of the commitment of individual staff members rather than as a result of strategic planning:

'We've got a very good relationship particularly down the road with the substance misuse services team, the [county] drug and alcohol team, most of our clients work with them, we work really well with them. There's nothing formal set up... we work very closely with the IOM, Integrated Offender Management team, so there's two or three police officers who work mostly with just about everybody that's based in our project here. There's quite a lot of partnership work here that does go on' (TS, A5).

6.76 Another third sector service provider reported that their most positive partnerships were with other third sector organisations:

'We work very closely with the likes of x, because we deal with families. A really great relationship we've got, there. We've worked with a whole range of organisations, from y, z. We'd like greater involvement with Social Services, but we do a lot of front-line staff work' (TS, A2).

6.77 Some challenges to partnership working were highlighted, for example, historically poor relationships between sectors:

'It's worth mentioning as well that historically our relationship with the homeless team has been up and down' (TS, A6).

6.78 Other providers also highlighted that differences in agendas could create challenges to partnership working between sectors, for example, different KPIs. Some agencies needed to rehouse people to remove them from caseloads and demonstrate successful completion of their duties, while others would need to demonstrate tenancy sustainability:

'So they will house somebody who is so chaotic that there's no chance, you're just setting up to fail but, for them, they've ticked the box for their KPI because they've housed someone' (TS, A2).

RSLs

6.79 In the local authority survey, in comparison to the PRS, fewer local authorities reported increases in partnership working with RSLs. Two reported a substantial increase, five a slight increase, and 15 no change. Those reporting a substantial increase offered no explanation beyond having very good working relationships with RSLs. All respondents who saw a slight increase commented on how positive relationships with RSLs continued to improve. For example:

'Partnership work with RSLs is already good and this has improved this week with training being provided on [the Act] and help with training tenancies for young persons'.

6.80 For six of the authorities that reported no change, this was due to already having good working practices with the necessary structures in place, such as regular meetings, a Common Housing Register, Choice-Based Lettings, and Common Allocation Policies. For a further local authority, however, no change was reported, due to *'limited units of accommodation becoming available'*.

6.81 Many RSL service providers noted improved relationships between themselves and housing teams in local authorities, both formally and informally. There was broad agreement that partnership working had improved, though *'It's taken a bit of time to turn things around in the way of enforcement, changing to prevention'* (RSL, A1).

6.82 In another case study area the local authority was exploring the kinds of demands they might ask of RSLs when approached about new developments – the building of more one-bedroom flats for example.

6.83 Some RSLs had recruited tenant support staff and prevention officers. Many authorities had been working towards developing a Common Register, and changes were being made to streamline allocation policies, share data, and develop compliance agreements and joint protocols around prevention. These included how referrals should work in potential eviction cases, but also around other grants:

'We've also got joint working protocol with all these section 180 [Homelessness Prevention Grant] grant recipients because the money's supposed to assist local authorities which they weren't' (RSL, A1).

6.84 Some RSL service providers felt that they had already embraced the prevention agenda: *'[T]here's more consistency in the working now. We're all doing exactly the same thing'* (RSL, A3). RSL service providers noted that Housing Solutions were doing more mediation, signposting, and tenancy support. In this way, they had moved beyond simply finding a roof over someone's head, and were now *'looking at the bigger picture'* (RSL, A3).

6.85 However, not all partnerships were working. In one case study area, Housing Solutions and tenancy support staff experienced significant difficulties with a particular RSL:

'They just don't want any tenants who are on benefits, who have been homeless, who are problematic. They're trying to turn it into a business and it's quite sad' (LA, A1).

6.86 This view was echoed to a lesser extent across the case study areas:

'Some housing associations are not willing to accept every referral that we send ... which is a real problem for us. So anybody who's got lifestyle or any issues that they're aware of, maybe they've been in their properties before and left with arrears, they just don't want to know them' (LA, A5).

6.87 This was felt to be particularly problematic in areas where the local authority had not retained housing stock. *'Perhaps if we had our own housing stock, we would have dealt with it very differently'* (LA, A5).

Tenancy Support

6.88 From the local authority survey, Tenancy Support is the area with the largest reported increase in partnership working by local authority housing teams. Overall, sixteen local authorities reported an increase in partnership working with Tenancy Support (Eight a substantial increase; eight a slight increase), whereas six saw no change. In five of the eight local authorities reporting a substantial increase, this was supported by changes in ways of working, including specific tenancy support training, relocating Supporting People services into housing, use of floating support, and payments to landlords. For example:

'To try to salvage tenancies and support customers, we use transitional money to support via incentives to landlord, rent arrear clearance etc.'

6.89 For three local authorities housing teams, the substantial increase was attributed to the level of demand/service provision, without explaining underlying factors. For example, *'the majority of cases ask for support service'* in one case, and *'All applicants in temporary have an automatic referral for tenancy support'* in another.

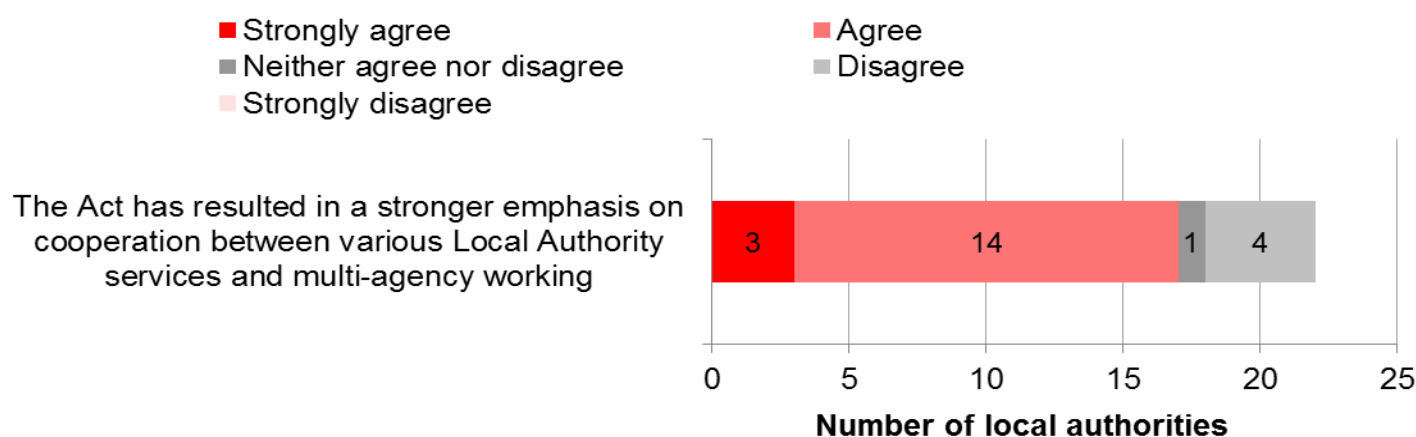
6.90 Of the eight local authorities reporting a slight increase that offered explanations, four referred to the introduction of staff that can offer tenancy support within the Housing Solutions team. This varied between welfare officers, tenancy support team and key worker arrangements. One further local authority stated that tenancy support had *'merged with SP'*, and one local authority was now working closely with Crisis for *'pre-tenancy support as well as support on moving in'*.

6.91 Only one respondent to the local authority survey reporting no change offered an explanation. However, in this authority, change was in progress due to a recent re-structure and *'tenancy support is now merging with this section of housing'*.

Partnership work & government agendas

6.92 Local authorities were asked whether ‘*The Act has resulted in a stronger emphasis on cooperation between various local authority services and multi-agency working*’. As can be seen in the figure below, a clear majority of local authorities agreed with this statement, and only four disagreed. However, this represents a decrease over the last year, as eighteen local authorities agreed in the first-wave survey, and a further two strongly agreed. However, when respondents were asked whether there had been any changes in partnership work, changes were reported across a number of local authorities, although the extent of these changes differed according to the partner, as will be discussed below.

Figure 30: Cooperation and multi-agency working resulting from the Act



Other Partners

6.93 In the local authority survey, over half of local authorities reported no change in partnership working with Environmental Health (12 authorities). However, one stated that there had been a substantial increase, and eight a slight increase, with only one reporting a slight reduction. The respondent reporting a substantial increase explained their response as follows:

‘Due to implementation of Rent Smart Wales we have worked with EVH [Environmental Health] to arrange HHSRS [Housing health and safety rating system] checks on PR [private rented] properties that are identified as suitable for an applicant to ensure they are safe. Have also liaised in terms of identifying if landlord is licensed/registered etc. for properties we are using to discharge duty and also when a s21 notice is issued to ensure its validity’.

6.94 Requirements of the Code of Guidance regarding suitability of properties was a driving factor for five of the local authorities reporting a slight increase in working with Environmental Health. For three of the local authorities, this means more referrals to

Environmental Health. However, one local authority reported how they have been learning from Environmental Health to undertake more work themselves:

'[Environmental Health] staff have delivered training for housing options staff to be able to identify issues with PRS accommodation prior to offering properties for homeless clients. External training has also been sourced with the help of staff in Environmental Health'.

- 6.95 Of the 12 local authorities reporting no change, five commented on how they already enjoy good working relationships, with one stating that Environmental Health are based within the same section of housing. The respondent reporting a slight reduction offered no further explanation beyond *'links with this department are formed'*.

Summary

- 6.96 There has been a small decrease since the first-wave survey in the number of local authorities that agree that the Act has resulted in a stronger emphasis on cooperation between various local authority services and multi-agency working.
- 6.97 However, this contradicts the more detailed findings from the second wave survey, where 16 local authorities report a substantial or slight increase in partnership working with Tenancy Support, and half of local authorities report a substantial or slight increase in partnership working with Children's Social Services. A substantial minority of authorities also reported increases in partnership working with Environmental Health and Adult Social Services.
- 6.98 Those respondents reporting such increases in partnership working within their local authorities mostly attributed this to new staff posts, co-location of services, and joint meetings among other initiatives. It is important to note, however, that the respondents offering explanation of no change in their local authorities explained this, for the most part, due to already having good working practices in place. The main reason offered for reduced partnership working within local authorities was both Adult and Children's Social Services focus on the Social Services and Well-being (Wales) Act 2014.
- 6.99 The local authority survey showed that there was a slight increase from 18 to 20 local authorities stating that the homelessness agenda informs the commissioning of Supporting People services. The main way in which respondents reported this taking place is through joint forums held to inform decisions (16 local authorities), while joint commissioning of services takes place in 14 local authorities. Floating support was the main way in which Supporting People resources were targeted to support homelessness prevention, followed by generic support service, and co-location of

homelessness/Supporting People services. Only six respondents indicated that their local authority has a fully integrated service. The slightly closer relationship with Supporting People services could also be seen in the introduction of gateway/referral processes for Supporting People services in a minority of local authorities since the first-wave survey.

- 6.100 Overall the majority of local authorities reported no change in partnership work with external partners. However, increases in working with the private rented sector were reported by half of local authorities. Increases were also seen in around a third of local authorities in terms of work with hospitals, prisons/youth detention centres, and registered social landlords. Six respondents referred to increased work with other local authorities.
- 6.101 Those respondents to the local authority survey reporting increases in partnership working attributed this to new staff posts, and new or better protocols. Again, the respondents offering explanation of no change stated that they have good working practices in place. Among the minority of local authorities reporting reductions in partnership working, reasons included perceived limited information and pre-planning from health professionals and prison officers, the affordability of PRS properties, and capacity of local authorities themselves.
- 6.102 There is evidence that the ethos of partnership working has been embraced strategically by local authorities and of increased and improved partnership working across local authorities, between local authority departments, with RSLs and with third sector providers. However, there is significant variation between and within authorities.
- 6.103 Local authority respondents and service providers across sectors were clear that the Act provides a framework for partnership working, and that this is positive. Half of local authorities indicate that partnership working with Social Services has increased. There are also examples where conflicting priorities and agendas (and sometimes individual behaviour) impede successful partnership working. However, a lack of understanding of the remit of organisations' service delivery also negatively impacts on partnership working. Local authority and third sector service providers indicate that more support is needed from Social Services across authorities.
- 6.104 Concerns were raised by service providers about partnership working with Health and Mental Health services. This was felt to be an area where significant improvements could be made. Where successful partnerships operate, this was seen to be contingent on individual (operational) relationships rather than strategic partnerships.

- 6.105 There was evidence of good partnership working with RSLs, but also areas where this could be improved. Again, individual relationships are relevant. Where partnership working was less successful, it appears that competing or conflicting agendas could also be an issue. Housing Solutions' focus is on prevention and avoiding eviction, while RSLs also have to take into account wider sustainable community/neighbourhood concerns.
- 6.106 Partnership working between third sector organisations was generally seen as operating successfully, but again, often individual relationships facilitated this. There were some examples of an 'us' and 'them' mentality characterising relationships between local authorities and third sector providers; sometimes this was as a result of historically poor relationships between individuals/teams. In general, however, the person-centred ethos of the Act was seen to have aligned the focus of local authorities and the third sector.
- 6.107 Partnership working appears to be a strength of Supporting People services, so perhaps the Act has had less impact in this area, although the provision of a framework for partnership working with Supporting People was welcomed. However, there is variation in the availability of Supporting People services across Wales.
- 6.108 Although Gateways were perceived by local authorities to provide a clear route to accessing services, service providers highlight that there are potentially negative outcomes in terms of adding an extra layer of bureaucracy and further challenges for service users to navigate. This is sometimes more difficult when numerous Gateways exist in one local authority area. Some third sector providers sometimes reported a lack of control over referrals where Gateways exist.
- 6.109 Future reductions in funding was also identified as a challenge to successful partnership working.

7. Person-centred practice

Introduction

- 7.1 The embedding of a person-centred practice into homelessness provision is a key ethos of the Act. This relates to an emphasis on involving service users in finding housing solutions and collaborative working with providers.
- 7.2 Local authority survey responses indicated general agreement (19 authorities) that the Act has enabled a more person-centred approach with clear pathways for housing support. More specifically, five local authorities strongly agreed that the Act had enabled a culture shift to a more person-centred approach, 14 agreed, two neither agreed nor disagreed, and one strongly disagreed. Four respondents strongly agreed that there are clear pathways in their local authority for homeless people with support needs to access housing support, fourteen agreed, two neither agreed nor disagreed, one disagreed, and one strongly disagreed.
- 7.3 Seven local authorities responded that there have been changes since the last survey. Two of those that have made changes explained that everyone who presents is now assessed *'to understand their needs and to be able to develop their housing and support plans'*,

Advice and assistance

- 7.4 In the local authority survey, respondents' views were elicited on the extent to which they think the Act has influenced their local authority to offer improved information, advice and assistance relating to homelessness. Responses were generally positive, with four local authorities indicating that they strongly agree that the Act has led to improved information, advice and assistance. Fifteen local authorities agreed, two neither agreed nor disagreed, and one strongly agreed.

Figure 31: Local authority views on information, advice and assistance offered (N=22)

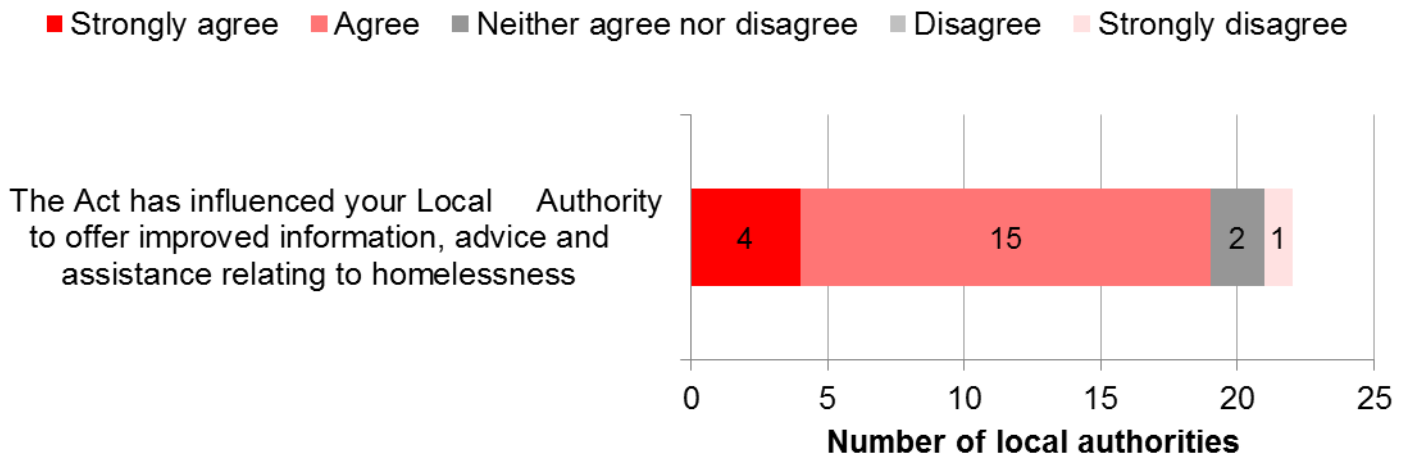
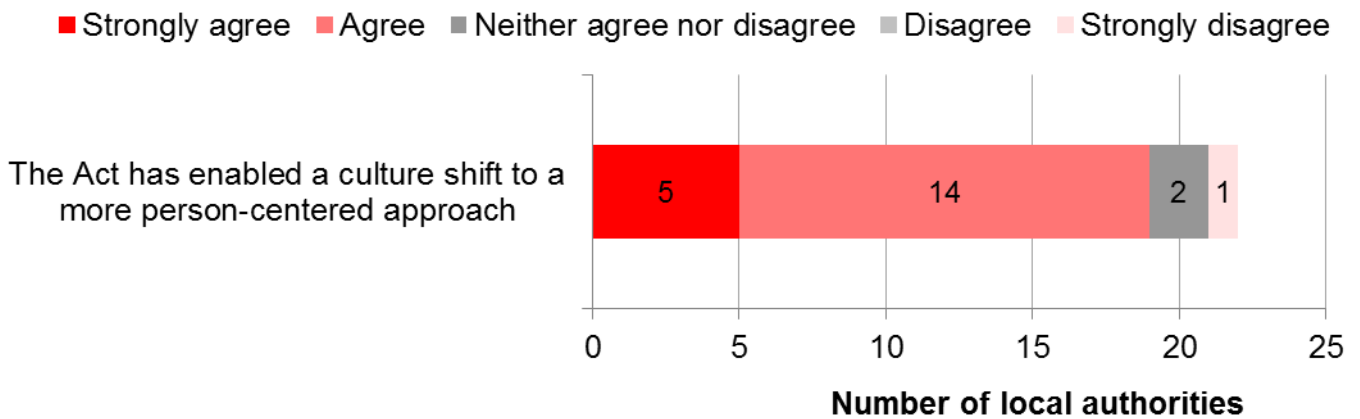


Figure 32: Local authority views on culture shift to more person centred support (N=22)



Service Providers views on person-centred practice

7.5 Contrasting the person-centred model with the ethos of the previous legislation, many local authority service providers reported significant positive change in culture as well as attitudes among staff:

'[It's] a totally shifting culture really' (LA, A3)

'The new legislation is completely person-centred; it wasn't before... It's their plan; it's not my plan, it's not my housing need, it's their housing need... It's quite a modern way ... I've had the luxury of not working under [the old] legislation and have been very fresh, and I do buy into this new legislation, absolutely.' (LA, A1)

7.6 Local authority service providers indicated that previously, practice was procedurally-driven, often crisis-led and *'quite detached'* from the service user. The new mode for working was *'more beneficial for the client'*. However, some staff working in Housing Solutions were described as struggling to adapt to the person-centred ethos of the Act:

'[Person-centred practice] isn't sitting well with some members of staff within our service, people who have been here and worked under the old legislation'. (LA, A1)

- 7.7 Contrasting the person-centred model with the previous way of working, local authority service providers reported positive change in terms of engagement between a local authority staff and service users. Several service providers reported an attitude change in favour of service users:

'I think that attitudes have changed as well, because previously perhaps we might have said, 'They've got debt with us, they've caused problems, we're not having them anymore' now we're looking at what situation they're in. What have they done to improve things themselves? Have they accessed the right agencies? Say with drug involvement, are they trying to improve that? Have they paid their debts?' (RSL, A3)

- 7.8 In addition, the culture shift was thought to have evolved from a changing role for Housing Solutions staff with more expectations being placed upon them:

'It's become a different job to what it was back under the old legislation, without a doubt. I think staff are expected to do a lot more within that role than what they did previously. Kind of become support workers inadvertently really, and I think that's the consequence of the Act really.' (LA, A3)

- 7.9 Therefore, it seemed that where divergence was to be found within teams, it often correlated with the length of time working within the field of homelessness. Variations were found between staff who had been working for a long time within the field, and those who were newer to their roles. The ways in which some staff resisted the culture shift was perceived as by gatekeeping services and blocking access to support:

'For me it's never about proving their intent, and at the end of the day they're still homeless... they are always trying to disprove everything... That's not the starting point; the starting point is what they're telling you is they're homeless. You don't go back and think, right, how am I going to prove that they're not?... My attitude is how are we going to solve the problem?' (LA, A1)

- 7.10 There was a recognition among local authority service providers that the range of activities undertaken had increased dramatically under the new Act. This was considered to be a strength as it enabled a more individualised approach to supporting service users and the role of tenancy support was emphasised.

'Talking to landlords, begging landlords, liaising, putting things in place, payment plans, if there's arrears, if there's antisocial behaviour - provide tenancy support to try to get that down' (LA, A1).

7.11 Several service providers reported that the person-centred practice culture had resulted in more time being spent with individuals to assess their needs:

'Working well? That we give the time to the client, so that we sort of get to know them, non-judgmental, whether it's condition of property, or anything like that, and not being a closed-book, I suppose. Not saying, 'Right, these are your options.' (LA, A1)

7.12 In addition, the person-centred approach was thought to counter standardised and formulaic practice by enabling more creative responses:

'Well you've got more room to be imaginative and room for manoeuvre sort of thing, you know, and it's quite satisfying that you can do that and not be so strict within... It's within reason isn't it, you know, common-sense.' (LA, A1)

'Just considering things outside the box and going that extra mile.' (LA, A1)

7.13 There were people working in the statutory sector who considered that the person-centred culture was already in existence:

'The person-centred approach has been here for many years. It hasn't really had an effect from the new legislation, it's always been in [local authority]'. (LA, A1)

7.14 However, some service providers described the implementation of the prevention approach as a work in progress:

'I wouldn't say we're 100 per cent there, I think we've got a way to go but we do consider people's needs' (LA, A2).

7.15 There were service providers, however, who felt that there was still disconnect between the person-centred ethos of the Act and statutory practice and illustrated this by comparing Housing Solutions with Supporting People:

'Supporting People are more people-focused and needs focused whereas the [Housing Options]...the majority aren't, they're process-driven so they're not people, they're numbers [driven].' (TS, A6)

7.16 Additionally, some service providers suggested that person-centred practice was only as good as the person delivering the service, noting the limitations on its value when people's personalities and behaviour were factored into outcomes:

'Some of it is down to really old-fashioned things like people and personalities in the job. [X has] worked in homelessness in [rural authority] for many years and she still cares about it and I don't care if it sounds soft and fluffy. There are people in other neighbouring local authorities who've worked in their field for many, many years but they don't ...have the same passion and they don't have the same basic strong ethics and morals.' (TS, A1)

7.17 An individual officer's ability and skill was raised as a factor which could limit the success of a person-centred approach, and interpersonal skills, in particular, were highlighted:

'Some of its maybe personality as well ... Not everybody is a good interviewer, you know, there are skills aren't there in listening and letting people say what they've got to say and take the time and that's how I do it, anyway.' (LA, A1)

7.18 The issue of increased workloads was also raised being a challenge to person-centred practice as the consequences of high workloads meant that there was insufficient time for frontline staff deliver person-centred services:

'I would say local authorities would like to think it was (person-centred), I think that the clients would disagree. I think the main reason for that is because of sheer numbers of people they're dealing with... When you're seeing in excess of 60 households a day, there are limitations to how much you can treat someone as a complete individual and a person, and tailor it completely to them. You also have a limited amount of time to spend with that person to find out what the right housing solution is for them.' (TS, A2)

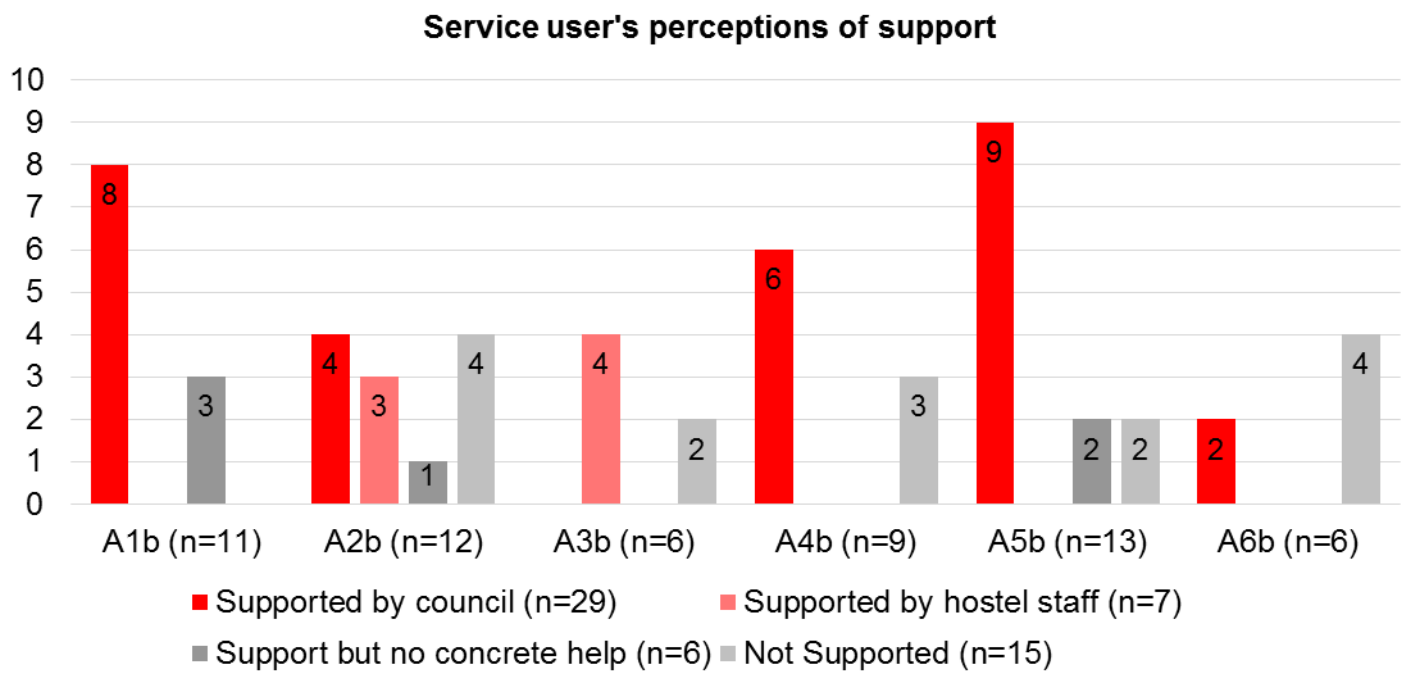
7.19 Some service providers suggested that service users do not want a more person-centred response as *'there's a lot of people that come in here, they're guarded, because they want a set of keys, and they don't want to tell us their life story'* (LA, A3).

7.20 In addition to this, there were questions as to how well the changes of the Act had been well communicated, in relation to engagement and person-centred practice, to the public as this respondent observed:

'I think certainly some of our revolving door clients are mystified and, actually, some of them have said to us, 'I don't believe you', you know when we're explaining to them what the new legislation is and what we're expected to do and how we're going to try and do that and, how they need to try and take some responsibility and all the rest of it. Some of those clients have actually just gone away, never to be seen again.' (LA, A5)

7.21 Findings across the second wave of interviews with service users remained very similar to the first wave regarding how well people felt supported, as seen in Figure 33.

Figure 33: Service users' perceptions of support



7.22 As indicated in the interim report service users in the main did not really understand the concept ‘*person-centred*’ but they talked about the extent to which they felt supported service providers. There was variation across the local authority case study areas with regard to people’s experiences of support. The majority of service users across the six local authority areas (29) indicated that they had felt supported by their local authority, seven by hostels, and six people said they felt supported - and received a service which was person-centred - but had not been helped in a practical way. However, a significant minority, (15 people) indicated that they did not feel supported at all. While service users recognised that there was a shortage of social and affordable housing across Wales, there was dissatisfaction regarding the gate keeping behaviour and attitudes of some Housing Solutions staff. In areas one and five, in the main, service users reported that they felt very supported. In area one, all 11 service users said they have received support from the local authority, although three reported not receiving any practical help. Area two had a more mixed response between those who felt supported by the local authority, those who felt that hostels had been the main source of support and those who did not feel they had been supported at all. Area three had a high proportion of people who reported feeling supported by hostels (four people). In this area, no service user reported receiving support from the local authority. In area four, six people indicated that they had been supported while three people felt they had not been supported at all. In Area five, nine people indicated that they had been supported by the local authority, and two had received support (advice) but not practical help. In area six, only two people felt supported by the local authority.

7.23 Some positive examples include the following:

'She had been so helpful, and had put all my apprehension and wondering what was going to happen - and she helped tremendously, and was very active and didn't leave it for weeks on end. So I just said that she'd been exceptionally helpful, and that I thought that they should know, really'. (SU, A5)

7.24 Service users reported feeling that the service was person-centred when staff took the time to reassure them, treat them with respect and empathy and maintained contact throughout the progress of their case.

'They've been excellent, really. Like I say, they're never rude. If you ask questions, they answer them. They don't sort of skirt round anything'. (SU, A5)

7.25 Whether service users felt supported, felt that they had received a person-centred service or had positive experiences to an overwhelming extent appeared to be contingent on interactions with individual staff. Maintaining communication therefore seems to be key to delivering person centred practice. Some service users talked about the efforts made to help them by Housing Solutions staff, which sometimes involved visiting people where they were living.

'To be quite honest with you both the lady in the council and the housing association they couldn't do enough for me to be quite honest, the two officers that I spoke to, they couldn't do enough for me. At the end of the day I was at the end of my tether, I was living in my sister's bedroom, I was desperate to get accommodation and I had the health issue. I've got to be honest there's been - well they'd seen - over the phone and they did come to the house.' (SU, A4)

7.26 Several service users reported that they had felt supported by Housing Solutions staff but ultimately, because there was a shortage of housing in their area, that there was a limit to how far they could actually be helped:

'I think they were limited, the problem was they were limited because they didn't have enough accommodation. This is quite a high focal issue for the moment anyway. The only accommodation that they could provide me was temporary through the council'. (SU, A4)

'[T]hey haven't got enough houses to go round. Let's put it that way. That's obvious. Nobody can do anything about that. Well, okay, the government could do a lot about it. Why not do what they done in the 60s/70s and start building?' (SU, A4)

7.27 This was felt particularly acutely by young single men who were not deemed to be in priority need. The excerpt from the following interview highlights how a lack of accommodation can create a vicious circle of instability when someone's life is already precarious. This service user felt that the current system was less helpful than the previous legislation when prison leavers would have been given priority for rehousing:

'She's been fine. It's just been now all these rules. It's very hard for a single lad to get any kind of, or I can't anyway get even a sniff of a council place or anything like just a bedsit or something. ... I think it's just lack of funding, because it used to be a lot better, but nowadays you don't seem to get the help that you need. Accommodation wise, as well, they just seem to leave you in limbo, especially single, like low priority, they should do more for us as well because you start going in and out of prison and crime and stuff like that. You end up, like I'm in this big circle at the moment like'. (SU, A6)

7.28 Over a third of service users expressed frustration at the lack of available social housing and barriers to entering the private rented sector. This led to them feeling unable to exercise choice, even though they appreciated the support provided despite their situation not being resolved. There was acknowledgement from some service users that Housing Solutions staff wanted to help them, treated them with respect and provided a person centred service. However, ultimately, they too were constrained by the limited accommodation available and so were unable to offer practical help.

'[yes they are] friendly, but they can't seem to do a lot for you....not a bad attitude, it's just that they can't do a lot for me at the minute like'. (SU, A6)

7.29 The main reason service users gave for not feeling supported or receiving a person centred service was a lack of respect and empathy shown by local authority staff.

7.30 For four respondents, the main issue raised was initially being led to believe that the local authority could help them, when in fact ultimately there were very limited options available to them. In the words of one person who had received a Section 21 notice:

'[S]he said, 'Don't worry, don't panic, it will be okay. We will re-house you. If we can't re-house you, you will get your bond and rent in advance back. You won't be homeless. It will be fine', and she gave us hope and looking back, that was a really cruel thing to do if you have no intention of helping somebody. The sleepless nights I've had and the anxiety. I've been so anxious'. (SU, A2)

7.31 This was echoed by a second service user who remained in the same circumstances as in the first wave of the fieldwork. She had a small child and was trying to move from overcrowded accommodation which she shared with family:

'I just think they've crossed me off the list now. When I was there, as I said, I was really optimistic about it, and I thought I'm going to get help here, and I'm going to be able to move out. It's just been really disappointing. ... They said that they would look for me and if they see anything at all they would contact me, but they obviously have thousands of people that they have to deal with, so I don't think that that is something they actually do'. (SU, A2)

- 7.32 Lack of empathy, warmth and compassion were cited as creating an unhelpful and demeaning experience by service users, and this runs counter to the person centred ethos of the Act. Negative and discriminatory attitudes from staff were reported by a number of people. Ten of the 63 service users interviewed reported that they felt they had been treated disrespectfully and made to feel inferior. *'Making people feel worse than useless.'* (SU, A4) They were spread across four of the areas, but half were in area two. For some people, this was experienced in the way that their housing options were conveyed:

'[S]he kept saying, 'You will be in a hostel. It will be awful, it will be horrible, you will have to lock your doors ... They're all awful. I will try and put you in the least awful one.' (SU, A2)

- 7.33 Other service users across three of the areas (two, four and six) described similarly unhelpful attitudes and lack of empathy, highlighting that they understood that local authority staff were governed by rules and procedures and they did not expect them to become overly involved in individual cases. However, an uncaring attitude from frontline staff made a difficult situation even worse for them. Some service users expressed frustration and disappointment that they had been negatively judged by service providers, when they had been making efforts to address the agreements laid down in Personal Housing Plans:

'I think in that sort of job, you need to have a certain sort of warmth about you, and she was very cold. I don't think if you've got that sort of... I understand they have to follow rules, and they have to be strict, and not emotionally attached to people, you know, people's problems, and what-not, but it's not very nice when you are sat with somebody and they're just, you know? You just feel like they don't [care] at all, do you know what I mean? That's what I felt'. (SU, A2)

'Like I said, you're trying your best to find somewhere, they make you feel as though you're not bothering. If you are in a situation like that, especially over that time of year, it's even more terrifying, because there are - there's nowhere open and she basically

said, 'If you can't find anywhere, not our problem.' ... People are not in this situation because they want to be in it. They need to be a little bit more human...' (SU, A6)

7.34 Some service users felt that staff had a negative attitude because of their disability, ethnicity or simply because they were homeless and therefore disempowered.

7.35 A service user who used a wheelchair reported negative attitudes among local authority staff. In the same local authority area, another felt that it was their ethnicity that caused staff to treat them unfavourably.

'Yes, I think yes, because when you go to that reception sometimes they don't, maybe because of my skin, they're just like they don't care, they don't respect.' (SU, A6)

7.36 Two service users described feeling disempowered by being homeless and that this created unequal relationships between them and Housing Solutions staff:

'It's been so - I understand they get people in there every day kicking off, and I understand they're at the coalface, but it's almost like ...It's almost like the attitude is they're dealing with people who won't fight back because they've had all the fight taken out of them and they can do what they want.' (SU, A2)

'They expect us to just take it, just to roll over because I think they think we're marginals or whatever' (SU, A2)

7.37 As covered extensively in the interim report, regular and respectful communication remained a key component of whether or not service users felt that the service they received was person centred. That most or all communication took place by phone in certain rural areas continued to be problematic for some people. In the words of one service user:

'The only thing I would like to say is sometimes when people initially get in touch with them and try to explain things, it's very, very difficult explaining over the phone. It is much nicer to have a face to face because you can be sobbing your heart out over the phone and they can't see the pain and they can't understand.' (SU, A4)

7.38 Some service providers also felt that accessing services by telephone was not aligned with a person-centred approach to service delivery:

'One thing, actually, that's come up is doing [the initial] assessments...and some people are having them over the phone, and they just think that they don't get to the heart of the issue when they're done over the phone and then they might receive their plan through the post.' (TS, A1)

Choice and control

- 7.39 Seven service users across all six case study areas reported feeling they had little choice or control over the process, or the outcome of presenting to Housing Solutions. One person talked about the unsatisfactory condition and location of the property they were offered, while another reported being resigned to accepting anything:

'They showed me one apartment which was a basement with no windows and dog crap everywhere in the yard and was trying to tell me how lucky I was to get it and I'm like, you know what, I'm not buying it. ... it was just the fact I didn't like somebody that didn't understand me, trying to tell me that I should live in a drug-ridden council estate'. (SU, A3)

'I've got to accept anything. ... I've got to accept what they offer me, basically'. (SU, A2)

- 7.40 In the words of another service user, whose wife was disabled and used a wheelchair:

'Well, we're not happy where we are. We've got a roof over our head, let's put it that way, and it's okay. As far as the council then, they phoned me up, what was it, six weeks after we'd moved in and said, 'What's your housing situation then...?' and I says, 'I beg your pardon.' 'Well, are you on the streets or where are you?' I says, 'No, well, [HA] has given me a house.' 'Oh, there you are then. We'll take you off the list.' As far as I'm concerned, and I will say it, I think the council, Housing Options, are as useful as a chocolate teapot, and you can use my words on that one as well'. (SU, A4)

Personal Housing Plans

- 7.41 The findings from the local authority survey show that when asked whether there has been a change in how they use Personal Housing Plans (php), 16 local authorities responded 'no', and six 'yes'. For four of those introducing changes, this meant the development of more bespoke plans which better addressed the individual circumstances of service users. For two others, the change was explained as benchmarking of best practice.
- 7.42 Many service providers across sectors and local authority areas emphasised the person-centred nature of the PHP. One indicated that the function of the plan is *'that you've got a clear idea of who's doing what'*. Several service providers suggested that the nature of a plan was an exercise in co-production:

'This is your [PHP]...what we can do for you, and what you can do for yourself. If you're doing it all for them...it's pointless in having a plan... If you're trying to hold their hand and take them through all that yourself, that's not a plan, is it?' (LA, A4)

7.43 The requirement to record actions (that is, reasonable steps) in a Personal Housing Plan was generally considered to be a positive one in terms of the message that it gave to service users and how it facilitated shared responsibility:

'People do feel that you're taking them more seriously, you've got the contract, you're keeping in touch with them, you're saying, 'Right, today we're going to review the plan, where are we?' Keeping in touch with people, I think, is important and not letting them drop-off so that they feel that they're forgotten. So that's important.' (LA, A1)

7.44 PHPs were described by several local authority service providers as embedding person centred practice, but cautioned that service user expectations needed to be managed:

'The Personal Housing Plan, that is their plan, that is the person's plan; you can't get more person-centred than that. It's their wishes - sometimes their wishes can't be met, we have to be honest, we're not going to sugar-coat things, but it is their plan.' (LA, A1)

7.45 Other service providers considered a benefit of PHPs to be the way in which it enabled work with service users to be more focused and clear, while others regarded the Personal Housing Plan as a means of holding service users to account:

'We do Personal Housing Plans, that's really good...it gives us a chance, if a client hasn't done what we've asked in order to prevent it, then we can say, 'Look, you have to go away, come back when it's done, because we can't do anything', so that's good.' (LA, A3)

7.46 This service provider also considered that completing PHPs prompted them to reflect and question their own practice: *'When I do my [Personal Housing Plans] with them, am I asking anything unreasonable? Don't go away and tell me you're going to do it and not do it.'* As such, the act and process of completing Personal Housing Plans was thought to reflect the person-centred ethos of the Act and countered the previous duty-led culture where decisions about what service users were entitled to was often communicated formally:

Limitations of Personal Housing Plans

7.47 Some service providers across sectors and case study areas felt that PHPs were formulaic and technical, *'it's a tick box to say that we've done it'*, rather than person centred and individualised, *'they're more or less identical'*. Other service providers described them as *'generic'* and having standard inclusions:

'Most of the housing plans that we see are quite generic, as opposed to being tailored to the person.' (TS, A2)

'I think when you look at a lot of the plans, a lot of them will have sentences plucked from potentially a sentence bank, and say things like, 'Look for accommodation in the private sector,' without really...much evidence that that person's specific circumstances have been taken into account.' (TS, A1)

7.48 It was suggested that a lack of consistency was problematic and the quality of a PHP would depend on the person responsible for completing it, since individual officers were considered to influence the process significantly:

'It depends on the worker filling it in. If they're passionate about that individual, about what the individual can do, how can we support them, how can we empower that individual, it will come across in a Personal Housing Plan. I've seen Personal Housing Plans with two words on! How is that effective?' (TS, A1)

7.49 In addition to the problem of genericism, rather than individualisation, some service providers considered that the introduction of PHPs had created another layer of bureaucracy which was unhelpful as it diverted time away from more direct work:

'It's just created more paperwork, and takes our time away from doing the actual work, because we've always done it. It's what we've always done in practice, but now, it's taking a whole host of time and paper to put it down in writing, that nobody even checks.' (LA, A1)

7.50 Some service providers reported that the success of a PHP depended on the service user group noting that *'It very much depends on the client group you're dealing with and age and how chaotic their lifestyle is and as to how well the Personal Housing Plan actually works for people'* (LA, A2). Another framed this within the context of working with vulnerable groups and capability issues:

'Trying to make housing plans with people that are totally individual to their needs and also to their, I don't want to sound condescending, but maybe to their capabilities as well because we all know that some of our clients are very much more able than others. The nature of homelessness is such that you do tend to deal very much with significantly vulnerable people in lots of cases.' (LA, A5)

7.51 Several service providers thought that service users did not always see the value of a written record and thought that they would prefer more face-to-face contact and direct work:

'These people have got so much complex need, they don't want a two-page PHP. They don't read it. It's that face-on-face, and if they don't understand it from speaking to you the first time, then in the next conversation it's reiterated. 'How well have you done with that task we gave you last week?' 'Don't worry, we'll try and focus on that one this week then'. (LA, A1)

7.52 Concerns were also raised about Personal Housing Plans not always being shared in a timely fashion:

'Half the time, some councils don't always send them on to tell you what their - and I've had to contact [local authority] to say, 'Can I have the Personal Housing Plan please?' (TS, A1)

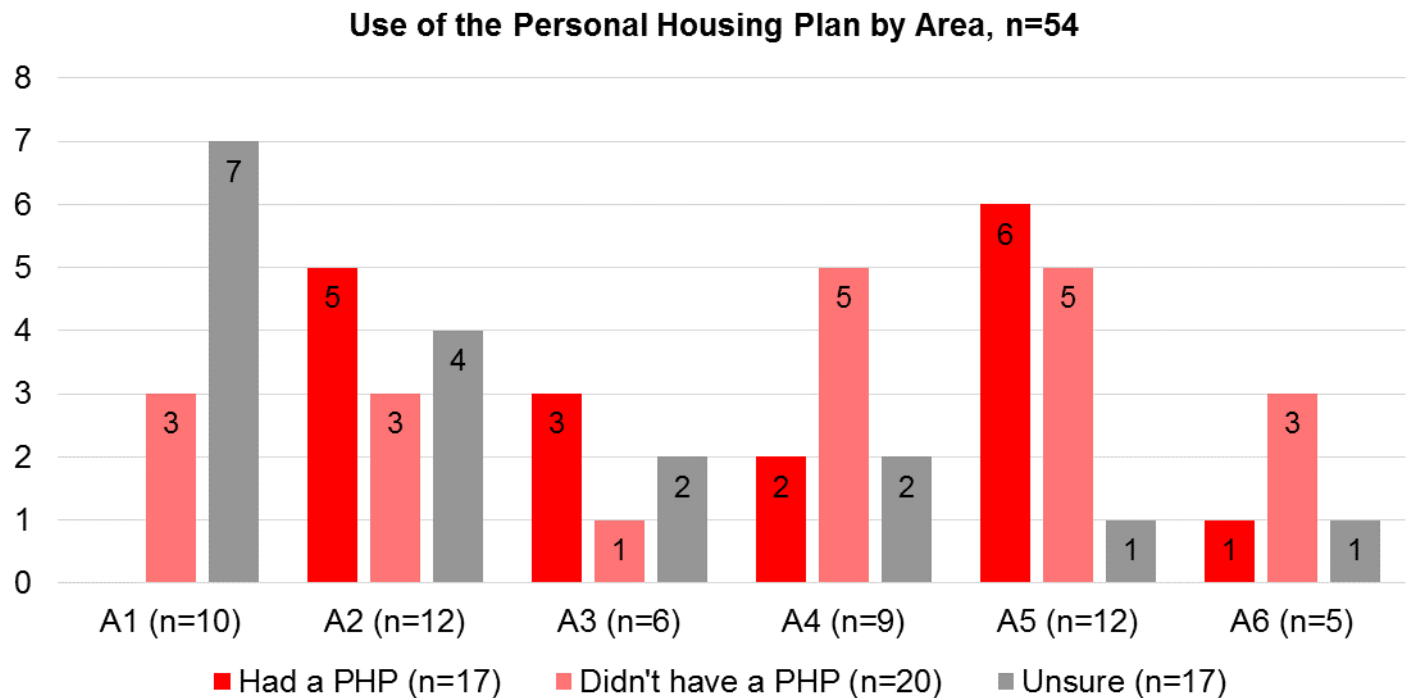
7.53 Some service providers however, – particularly from third sector organisations - described the creation of an PHP as a tick box exercise that absolved the local authority of responsibility:

'What worries me about the Personal Housing Plan is where you do see, as you say, is that it's putting the emphasis on the individual, as if it's all about their shortfall as an individual, why they're not in secure accommodation and ignoring the resource issues about provision.' (TS, A1)

'I think it's good that they're documented but...I am a little bit concerned that if a local authority were to say, 'Well, you haven't done X, Y and Z therefore we're finding you intentionally homeless', that's my big concern. That if it's a stick to beat somebody with if they haven't followed the personal housing plan.' (TS, A4)

7.54 In the experience of service users, there was a wide variation among the different areas in how local authorities were using Personal Housing Plans, and how they understood them. The numbers of service users who reported receiving a Personal Housing Plan, those who reported never receiving one and those who were unsure can be seen in Figure 34 below.

Figure 34: Use of PHP as reported by service users



7.55 It is important to note that for the 17 service users who thought that they had received a Personal Housing Plan, no-one reported finding it helpful. Some people felt that it asked them to do what they were already doing. Several people reported feeling that Personal Housing Plan had been imposed upon them, particularly in area two, as the following interview excerpt illustrates:

‘Q: Were you involved in developing that plan or was it just that you were told to do it?’

R: I was told to do it.

Q: Was it useful to you in any way?’

SU: No.’ (SU, A2)

7.56 Service users reported feeling overwhelmed at a time of acute stress and anxiety and being unable to recall the details of PHPS.

‘To be honest, I can remember having an interview and they gave me some things. I might have signed one or two things but I don't think there was any massive structure. I can't recall. To be honest, that was the least of my concern at that point, so I wouldn't have prioritised as a thing, do you know what I mean?’ (SU, A2)

7.57 In the words of another service user:

‘When they're giving a load of documentation, it's just their very nature, isn't it, that you just don't, you know? Just like the forms you're giving me here, and no disrespect, but

I'll probably just have a skip over but I won't read it, do you know what I mean? You just tend not to, don't you?' (SU, A2)

- 7.58 Some services users reported finding the language in the PHP intimidating and felt that the expectations placed upon them were not reciprocated by the local authority, in this way therefore, there was no recourse for service users if service providers did not deliver on their agreed actions:

'I just think the language was a bit intimidating. It was, 'This is your duty. This is what you have to do.' I know what I have to do. I have to not be homeless. And then it was, 'If you don't fulfil your part of it', and they didn't fulfil their part anyway, so'. (SU, A2)

- 7.59 In this area, Housing Solutions had begun to require service users to prove they were looking for private sector accommodation. One service user explained that it was often difficult for them to fulfil their obligations to provide such evidence:

'Q: What do you need to do specifically as part of that plan, is it like a certain number of properties you've got to apply for?

R: I think it's ten. It's not really, you get sheets and you've got to fill them out and it's five per sheet, and I do ten, so I do two sheets when I see her, maybe four, depends, because now it's two weeks.

Q: So, ten every two weeks, or every month?

R: No, I do ten a week, sorry. I do two sheets, ten a week, so when I see her now, I give her four sheets of properties, but they want it now signed by estate agents, and like I said, they get funny, they don't want to sign it.' (SU, A2)

- 7.60 Some service users also felt that the Personal Housing Plan allowed local authorities to absolve themselves of responsibility.

'They made me sign their disclaimer that said that it's my responsibility to actively look for places, and I need to prove that I'm actively looking for somewhere to live myself.

So I did, I had no choice, I had to... I was actively looking for somewhere anyway, I had to find somewhere for myself and my two girls.' (SU, A5)

Reviews & appeals

- 7.61 Findings from the local authority survey indicate that the overall number of reviews reported was 328 in the last year – an average of 14.9 per local authority. At first glance, this is a reduction from the first wave survey (from 391 reviews; 18.6 average per local authority). However, direct comparison would not be advised here as the time period for

reviews and appeals was inconsistent between the two surveys²⁷. One local authority accounts for more than half of the total number of reviews (177). This represents a smaller proportion than in the first wave survey, when the same authority accounted for almost two-thirds of reviews. Of these reviews, more than half (103 reviews; 58%) were successful, which is above average for the local authorities (45%). The overall proportion of successful reviews has decreased from 49% in the first wave survey. The overall number of appeals is higher, however. Seventeen appeals were recorded, twelve of which were successful. The appeals were spread between five authorities, which represents an increase on the four appeals from two authorities in the first wave survey.

7.62 When asked whether the number of requests for local authority decisions to be reviewed/appealed had increased or decreased in the last year, seven local authorities stated that there had been an increase, and 15 stated that they had decreased. These results suggest a perceived year on year decrease, particularly as 16 local authorities also reported a decrease in the first wave survey.

7.63 Among those local authorities experiencing an increase, three respondents attributed this to parties being more informed, whether applicants, Shelter or other external agencies, meaning that they are more confident *'to challenge decisions'*. However, one of the respondents claiming an increase offered a more nuanced picture:

'Reviews of suitability of offers of accommodation -social housing- has increased very slightly. But reviews of other decisions has significantly reduced'.

7.64 Four of the 15 local authority respondents reporting a decrease explained this through increased engagement with households at the early stages. One local authority felt that the number of requests had recovered from a temporary spike following the introduction of the new legislation, as it was possible to *'resubmit an appeal denied under the old Act'*. In three local authorities, the decrease was explained as resulting from working with Shelter Cymru. For example:

'More emphasis from the likes of Shelter Cymru to discuss cases informally to try and resolve ahead of formal review requests'.

7.65 The majority of local authorities also appear to believe that there has been a decrease in the number of successful reviews and appeals of their teams' decisions in the last year. Six respondents stated that there has been an increase, and 16 stated that there has

²⁷ The period from the start of the new legislation in April 2015 to the first wave survey in July-August 2016 is approximately 15-16 months. The second wave survey was conducted in August-October 2017, approximately 12-15 months after the first wave.

been a decrease. In the local authorities reporting an increase, three respondents suggested that this was only slight. One of the respondents again put this down to more informed external agencies, which they believe are 'more confident when encouraging service users to challenge decisions'.

- 7.66 Four of the respondents reporting a decrease felt that this was due to improved decision making. More specifically, two of these were concerned with making more suitable offers. For example:

'The overall decision making has improved and less cases have been overturned at review. No cases have been taken to appeal as yet'.

- 7.67 One respondent to the local authority survey attributed the decrease to a regional reviewing officer 'who carries out all reviews for the Authority'. The other 12 respondents did not give reasons, although one pointed out that while there have been fewer requests for appeals, all were upheld. One local authority was keen to note that their figures were estimates, which suggests that improvements can still be made to record keeping on reviews and appeals.

Summary

- 7.68 The local authority survey showed that almost all local authorities consider the Act to have enabled a culture shift to a more person-centred approach (see also Fitzpatrick, Pawson, Bramley, Wilcox, Watts, & Wood (2017), and believe that they have clear processes for homeless people with support needs to access housing support.
- 7.69 Only six local authorities have made changes in how they use Personal Housing Plans in the last year. The most common changes are using bespoke plans and benchmarking of best practice.
- 7.70 There was disparity among the local authority responses to person-centred practice. There is evidence that culture change to person-centred practice across Wales is a work in progress (see also Welsh Audit Office, 2018). Nineteen local authorities indicated that the Act has enabled more person-centred practice and service providers were overwhelmingly supportive of the Act's ethos and the resulting new ways of working. This appeared to be more strongly felt among new staff, and those who had not worked under the previous legislation. However, there was evidence of resistance to change among those who had worked under the previous arrangements.
- 7.71 Evidence suggests that there are examples of person-centred practice being embedded across Wales. However, there are also examples of a lack of responsiveness and

evidence of the ethos of the old system where the focus is on gatekeeping and assessment with regard to priority need and intentionality (see also Shelter 2016b; Welsh Audit Office, 2018). This means that service users experience divergent outcomes in relation to the service they receive depending on where they present as homeless/threatened with homelessness.

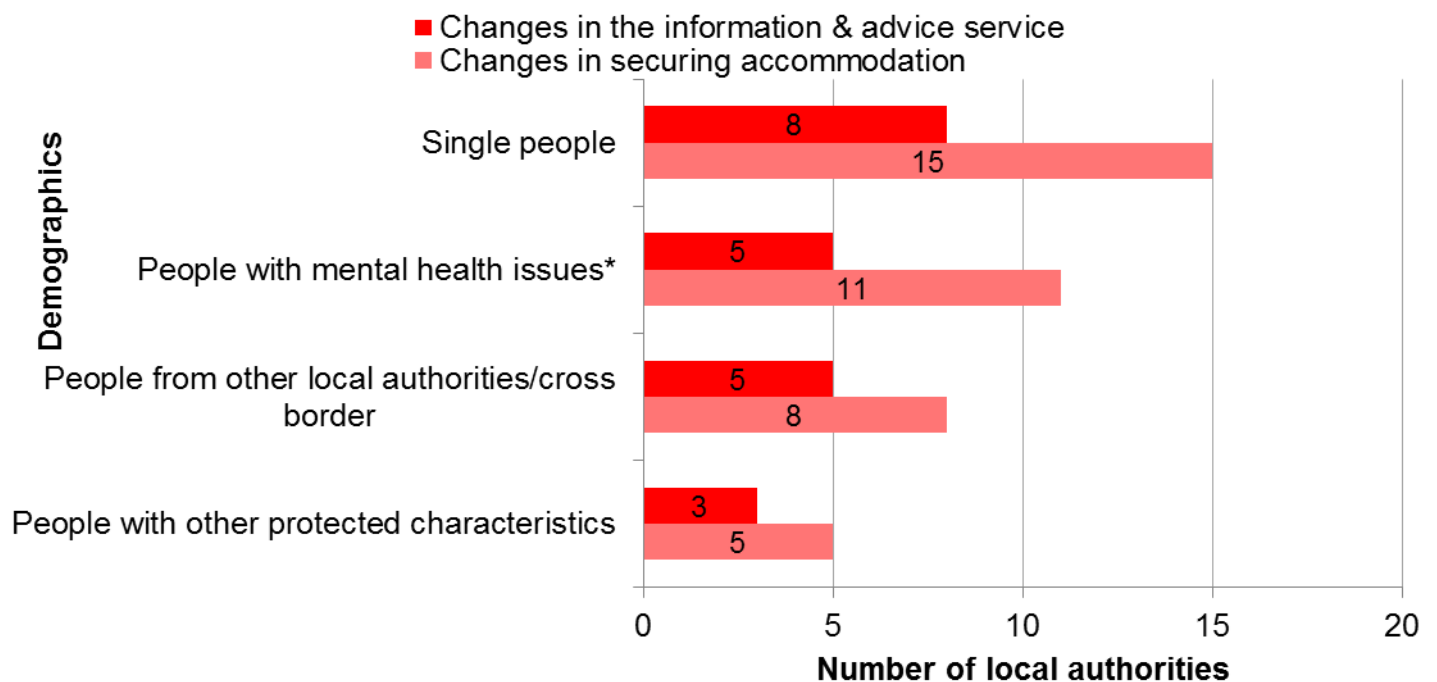
- 7.72 Consultation with service providers suggests that there is strong evidence that some local authority staff have embraced the culture shift to person-centred practice and that they are fully engaged with the Act's ethos. However, there is variation across and between authorities, and also within teams. As indicated above, Housing Solutions staff are now required to have new skills and supportive and empathic interventions, particularly at the first point of contact are vital for service users' positive experiences.
- 7.73 It is clear that individual service providers have a significant impact on the experiences of service users and the implementation of person-centred practice. In the main, service users said they felt supported and treated with respect, but a significant minority (15 people of 154) did not. Such negative interactions with homelessness staff can be understood as running counter to the ethos of the Act.
- 7.74 It appears therefore, that *'changing the culture of practice, although achievable, is a slower and harder task than developing the legislation'* (Public Policy Institute for Wales, 2017:18). It is clear that there is further work needed to comprehensively embed culture change across Wales.
- 7.75 For service providers the use of Personal Housing Plans is generally positive. They play an integral role in helping them deliver support and assistance in a person-centred manner. However, there are some limitations, for example they involve increased bureaucracy and paperwork. There are significant concerns about how they work for service users who do not find Personal Housing Plans useful. Service users reported finding the language intimidating, and felt that the onus on them to act can be perceived as allowing the local authority to be absolved of responsibility as there is no recourse for service users should they feel that the local authority has not taken appropriate steps established in the PHP.

8. Vulnerable Groups

Introduction

- 8.1 This chapter presents the findings in relation to ‘*vulnerable groups*’, people with protected characteristics and other cohorts who have historically experienced limited services and support in relation to homelessness prevention and relief.
- 8.2 The local authority survey questions relating to vulnerable groups had a slightly different focus to the interview questions with service providers in that they centred on mental health; single people; young people leaving care; people leaving prison or youth detention accommodation; forces leavers; rough sleepers; and people with other protected characteristics. It is also important to note that the questions for young people leaving care; people leaving prison or youth detention accommodation; and forces leavers only concerned information and advice (i.e., questions were not asked on securing accommodation for these groups).

Figure 35: Local authorities that have made changes in the information and advice service/securing accommodation (by demographic group; N=22)



*For information and advice, this refers to people receiving mental health services in the community. In total, six local authorities reported making changes to the information and advice services for people leaving hospital after medical treatment for mental disorder as an inpatient.

Single People

8.3 A total of 32 single people were re-interviewed in the second wave of the research, fewer than half of the 75 single people interviewed in the first wave.

8.4 Responses from the local authority survey indicate that overall, changes for single people have been more frequent across local authorities. The eight local authorities making changes to the information and advice service for single people primarily explained these in terms of changes to the level and type of advice (five local authorities), including advice on *'house share... for under 35s'*, *'a Personal Housing Plan which looks at their needs'* and an improved website. One local authority reported increasing the number of staff *'to enable clients to be seen sooner'*. Two respondents reported working closer with partners. For example:

'We have liaised with local voluntary groups/churches who provide meals/clothing etc. for the homeless, to provide more information on services available so that they are able to signpost'.

8.5 The majority of those who responded *'no'* did not elaborate. However, three local authorities offered a fuller explanation. One local authority already had in place a key worker project to assist persons who presented as homeless or threatened with homelessness. Another local authority added that they have actually strived to *'expand the use of the PRS to identify affordable sustainable permanent solutions'*. One respondent explained that they were looking at change in order to *'improve single person accommodation and the impact of universal credit'*.

8.6 Single people are the particular group for which most securing accommodation changes over the last year have been reported. Fifteen local authorities stated that there has been a change in their experiences of securing accommodation for single people. More specifically, 13 respondents to the local authority survey stated that it was becoming more difficult to secure, while one offered a more mixed picture, and one did not elaborate. More specifically, 10 responses referred to affordability/lack of suitable accommodation. For example, one stated that:

'Single person accommodation is in very high demand throughout the Borough but in very low supply. HMOs are having to be explored by applicants due to the shortage'.

8.7 Among service providers across sectors in all six case study areas, there was agreement that while the number of people presenting as homeless had increased dramatically, their situations have also become much more complex. This has made it more challenging to

provide appropriate support since there were multiple types and levels needed for any one individual.

'Since the new legislation's come in the majority of my cases seem to be [section] 73s which are your single people... They all seem to be more complex with mental health, drug, alcohol, debts. I think I've got one lady's case at the moment and I think she's ticked every box from mental health issues, drug, alcohol, debt, domestic violence...'
(LA, A3)

8.8 In December 2017, the Welsh Government has pledged to end youth homelessness by 2027 and will be investing £10 million to address this²⁸. Service providers reported that there was already some provision for young people facing homelessness across all six case study areas, primarily age-restricted hostels and projects designed to provide support into permanent tenancies and employment. Service providers across sectors and case study areas agreed that young people aged 16-17 years were a category of service users who received concessionary treatment and that there had always been a solid understanding of the importance of working with and supporting young people to avoid a future trajectory of homelessness and insecurity:

'All of the local authorities that we've ever worked with, have always very much felt that if they don't work well with the young people who are presenting as homeless, then they'll be working with them again in two years or in six months. If they don't work well with them when they're young it's going to be the rest of their life, they're going to be in and out of those doors.' (TS, A3)

8.9 Six service users under the age of twenty-five were interviewed in the second wave of the fieldwork. Of these, four had been supported into permanent accommodation, three placed in RSL properties and another young couple with a child had moved into private sector accommodation. Two others, both single women with dependent children, were living in family hostels. Neither had been able to find private sector housing that would accept benefit payments, and hoped to be placed in social housing.

8.10 Service providers across sectors reported that the biggest change across all six areas was the significant rise in the number of young people accessing services at an increasingly younger age. One hostel reported receiving 180 referrals over the previous twelve months and only being able to accept 18 of these. Sixteen of these young people also needed support for mental health issues.

²⁸ See <https://inews.co.uk/news/uk/wales-pledges-stop-youth-homelessness/>

'The mean age in this hostel six years ago was around 42, with the lead need being substance misuse. My average mean age now is 22, with the lead need being mental health and young people combined.' (TS, A1)

'It is frightening. We never used to deal with mental health in young people. I've had two sectioned from this hostel' (RSL, A1)

- 8.11 Therefore, not only was the average age of service users reducing, there was also a view from service providers that the issues involved for each young person were becoming increasingly complex. Structural factors, including a lack of employment opportunities, the impacts of policy aimed at resource constraint, and a lack of appropriate affordable housing were thought to compound the difficulties facing young people:

'[W]e've got young people presenting with emerging complex needs, personality disorders. We can't be surprised by that, I don't think. In many ways that, where we are economically and politically, we're just going to get more young people, and yet we've got this really bare system for them where the money's limited and their housing is limited, their opportunities are limited and then we wonder why we've got so many young people who seriously surf around.' (LA, A5)

- 8.12 Welfare reform in particular, and the subsequent impacts on households' income was thought by some service providers to have led to an increase in the number of young people becoming homeless:

'We have seen many more younger people coming through ... where there's been family breakdowns, or families asking them to leave because of the bedroom tax or a reduction in benefits and all those sorts of things.' (TS, A2)

- 8.13 However some third sector providers suggested that the priority given to 16-17 year olds could potentially encourage young people under the age of 18 to leave home sooner while they were still eligible for support. As such, this was felt to be an unintended consequence of the provisions of the Act:

'You go from 17-year-olds, who pretty much all get priority housing need. One minute you're at the age of 18 and suddenly you can be in a position where you're suddenly not deemed a priority, and that's very reflective of the Housing Act and their attitude.' (TS, A4)

- 8.14 Service providers reported that their preferred focus in the first instance was to use mediation to help young people return to their families, *'we would try and move the young person back home, any family or friends, and failing that there is a supported housing scheme'*. (TS, A4)
- 8.15 However, some third sector providers highlighted a potentially problematic aspect of mediation – another unintended consequence of the Act - where young people may be encouraged to return to abusive or dangerous situations.
- 8.16 Other service providers also highlighted that changes to the benefit system further limited the housing options for young people due to reductions in housing benefit payments for those under 35 years of age. In some instances it was again suggested that young people may be forced to remain in potentially dangerous situations:
- 'Are you forced to stay in an abusive family home then...? You don't get benefits if you're under 35, to be quite honest with you. You only get a shared room rate. You're not entitled to full payment for a one-bedroom flat until you're 35, so are we now saying that you have to stay at home until you're 35? But what happens if you're in an abusive situation?'* (T S, A1)
- 8.17 However, although shared accommodation was often the only option for single young people, several service providers expressed significant reservations about this being appropriate for young vulnerable people:
- 'There's expectation of the younger people having to share. They've got multiple needs, multiple problems. Mental health issues, drug and alcohol, substance misuse. Putting two or three of them to share, it's not an easy answer, is it?'* (TS, A4)
- 8.18 Timely assessment and support were presented by service providers as being key to successful prevention interventions with young people. However, service providers highlighted that there were challenges in delivering this. Where the referral process had been streamlined and more highly regulated through a Gateway, some third sector service providers highlighted unintended adverse consequences in that they were then no longer able to refer amongst themselves if someone's needs proved to be too complex for the initial placement.
- 8.19 In addition, the limited time available for Housing Solutions teams to properly assess young people was raised as an important issue by third sector providers:

'The thing about Housing Options, they only have perhaps a limited amount of time to assess this young person. How do you assess a young girl of 16 how vulnerable they are apart from the fact of her being 16?' (TS, A4)

8.20 The time limit for hostel stays was also highlighted as being problematic. This was thought to reflect internal pressures combined with the new time periods specified under the Act, but service providers reinforced the need for flexibility in time limits given the difficulties of placing young people into appropriate housing. There was a danger that a 'revolving door' effect could occur as a result:

'They're often more demoralised in the end aren't they, because they know when that three months is coming up here, and they haven't found them anything over there, it's a case of I'm going to be back out on the streets again, so luckily for us we can give them an extension for another three months, but again it's still in the same thing. The 56 days is up, we won't work with them then, at the end of the day. ... If they do become homeless here after the six months, we advise them to go to housing and say they're homeless again, and the 56 days will start again then.' (TS, A3)

8.21 Multiple challenges were identified by local authority service providers in supporting young people into stable accommodation. Common themes across the six areas were the need for support before and during a tenancy, and issues both with the limitations imposed by the benefit cap and the lack of housing in the private rented sector:

'17-year-olds can't live at home, so give him a flat, but he hasn't got life skills. It's making sure that they have the building blocks. So we're starting to look now at the pre-tenancy stuff as well' (LA, A4)

8.22 Moving from temporary accommodation to the private rented sector was seen to be particularly difficult for young people. As one service provider explained, even when appropriate accommodation was available, other barriers remained as private landlords were often reluctant to rehouse young people:

'Private rental then won't touch them because there's no bond there, they're not old enough to take a bond or anything else, so they are doomed to failure from the start, unless they interact and they really, really go forward and have help from outside, their parents or anything, with the bond and everything else. Really speaking, it is a shortage and lack of housing and flats.' (LA, A3)

Mental Health

8.23 As indicated above, an increased prevalence of mental ill health was a significant factor affecting service users and service providers' capacity and ability to deliver appropriate support. As established in the first wave of interviews, issues with mental health affected all service users, irrespective of age. Fifty-nine of the 153 people interviewed had identified poor mental health as a primary issue and all other service users reported experiencing some level of anxiety, depression or deterioration in their mental health as a result of their precarious housing situation. In the second phase of the fieldwork, twenty-five respondents across all six local authority areas talked about the impact of unstable housing situations on their diagnosed mental health conditions (or those of their immediate family).

8.24 This was also reflected in the discussions with service providers across sectors and case study areas who identified mental health as *the most* significant issue for them as providers. This was the case across all sectors and local authority areas and was thought to pervade every aspect of service delivery and other agendas:

'It is apparent that within every group that you go and visit or most of the projects there's an element of mental health somewhere.... It's a problem and it impacts across all services. It impacts crime, health, education, homelessness, housing'. (LA, A1)

8.25 For some service users being placed in more secure accommodation had positively impacted on their mental health. One service user, a survivor of domestic violence, stated:

'The psychiatrist, about a month ago because he said, 'I can't believe the difference since you've moved, everything seems to be... and everything fell into place. It just did.' (SU, A3)

8.26 However, others did not report such positive outcomes. One service user described how his mental health had deteriorated during the period between the first and second waves of fieldwork: This service user was the only person who was referred to Supporting People services:

'Between the last time I spoke to you I've taken a dip, I haven't been so well. The doctor has helped me access some help with that.... I'm supposed to be receiving the support from the Supporting People...so hopefully I'm going to be getting some help with that. I've received paperwork to say that I'm in there, I just haven't been contacted yet. So hopefully that's going to help with some of the practicalities.' (SU, A5)

- 8.27 Service providers across sectors identified a lack of support services for people with mental health issues as a major gap in provision. A lack of appropriate housing, particularly supported housing, was also identified across all areas. Issues around mental health created an increased need for pre-tenancy work as well as support in maintaining tenancies, while also impacting on an individual's abilities to take on increased responsibilities for finding their own housing. A recognised need for training was articulated by service providers across all areas, around mental health first aid, assessment and empathy for people with mental health issues. The need for improved partnership working was also raised repeatedly by service providers (this is also discussed in the Partnership Working chapter).
- 8.28 A significant barrier to people being able to access mental health support services was identified as taking place at primary health care level. GPs often control the route for people to access specialised mental health care. Other routes to mental health services can be through hospital referral, but unless people are in receipt of such services, they are not considered to meet a threshold to access support. This was the case for people with low level mental health needs who could not access support and also for people with more severe conditions where support is limited.
- 8.29 Many service providers also reported perceived limits to GPs' understanding of the needs of homeless people, particularly those who are rough sleeping:
- 'They're very reactive ... for example with regards to suicide a lot of GPs who see someone who's stating they feel suicidal will offer them antidepressants and give them an appointment for two weeks' time which I don't feel is adequate ... but then for the referral on to the primary mental health services are so stretched and there's a long waiting list'. (TS, A2)*
- 8.30 In addition, concerns were raised by many service providers about homeless people not accessing GPs in the first instance, and this effectively precludes them from accessing mental health support. Numerous service providers raised the issue of those with low level mental health issues, which tended to be undiagnosed, were insufficient to allow them to be categorised as vulnerable, and therefore negatively impacted on the support they were eligible for. When some service users experienced difficulties even accessing a GP, this was a barrier for diagnosis and full support, which caused additional complications in terms of how people's needs were categorised:
- 'If we want to access mental health services ... you have to go through the GP surgery. ... Yes, but how does that work if you don't know which GP surgery somebody's with?*

How does that work if they're not engaging with us? ... what happens if actually they've chosen not to be with their local GP surgery or because of their mental health they've actually been excluded from their GP surgery for another GP surgery? So access and mental health is a huge problem for us, increasingly so.' (LA, A5)

8.31 RSL service providers also reported challenges as a result of the increased prevalence of mental health issues. Most felt they did not have the capacity to effectively address such needs and balance community and neighbourhood sustainability with the needs of individuals.

'There isn't enough support, no. Then we're up against targets as well and obviously allocations of sustaining tenancies, you know, and keeping the rent arrears down. So it's a struggle really' (RSL, A1).

8.32 Some service providers also expressed concerns that they and other hostel residents were potentially being put at risk as a consequence of a lack of support for people with mental health issues. For hostel workers, who essentially live with those staying in their accommodation, this was experienced particularly intensely.

'I will have to end the accommodation because he will become too high risk and will be putting the safety of my other residents and for the greater many that I have on the staff team, he'll have to go.' (TS, A6)

8.33 There are further challenges when mental health issues are exacerbated by substance misuse. Issues with mental health teams being unable or refusing to engage with service users with substance abuse issues were reported across the case study areas.

'I mean, mental health won't look at anybody if they're using substances' (LA, A4)

8.34 Substance abuse is an issue that is generally experienced alongside multiple other issues, whether mental health, learning disabilities, a history of domestic violence and abuse or rough sleeping. Twelve service users discussed substance misuse, in combination with experiencing mental health issues. For one of these, the local authority had been a key part of their recovery process, helping them to find private rented accommodation after time spent in rehabilitation and by providing a deposit. They had remained substance free over the period of the two interviews, and were looking forward to moving back into work after the year of recovery prescribed by their doctor. All but three of the twelve people who used substances remained affected by this.

8.35 In addition, substance misuse was regularly encountered in the hostels across all six case study areas. Some service providers highlighted that the consequences of requiring residents to cease using substances often led to them sleeping rough. Service providers reported trends in the types of substances being used; in some areas, the principal problem had become so-called *'legal highs'* commonly known as 'mamba' or 'spice'. Service providers also expressed concern that paramedics and emergency service operators were not always familiar with the manifestation of these drugs.

8.36 A number of service providers highlighted the need for housing where certain behaviours could be tolerated.

'The entrenched sort of drug and alcohol and homeless sort of go hand-in-hand and there just isn't any resources out there, or any places or accommodation that will allow the behaviours that they present with in terms of all their complex needs altogether. ... They are beyond the needs of the social housing or the general housing' (LA, A6).

8.37 A Mental Health service provider explained how this operated practice, highlighting the distinction between those people with low level and higher level mental health issues, particularly in relation to the lack of support available for those who have not accessed primary care or received secondary care services:

'There are two quite distinct populations in terms of mental health and the approach to housing. I definitely think that the people that we tend to work with are secondary services ...who are already engaged with those services. Then, there's probably an even bigger population of people who have mild to moderate mental health issues, like depression and anxiety, and social phobias, who probably don't fit so well within mental health services, but actually they have quite a big need in terms of the housing community...They don't have a care coordinator, they don't have a psychiatrist that supports them. In many ways, if you have secondary services, it's much, much easier to engage. Whereas, when you're not and you don't even reach the threshold of primary care services, it's really quite hard to get a service.'

8.38 It was also acknowledged by service providers across all authorities that while those people with substance misuse issues would engage with housing services they would often be reluctant to engage with agencies who provided substance misuse support.

8.39 Various training needs were identified by service providers across the case study areas. Third sector staff in particular identified a lingering stigma around mental health, and a lack of empathy towards service users:

'I've been trying since November for one of my clients. ... He's got severe mental health issues. Again, he's got a criminal history, he's got a drug past, he's been evicted from a number of properties. The issue we have is partly with the mental health team; they are not prepared to do assessments on him. ... We had the police actually take him up there for an assessment one day, but because he was under the influence they refused to do anything. They're saying he's got no mental health issues. He's being medicated for mental health. But no landlord will take him because of the history. But this gentleman is street homeless, severe mental health issues, and there's nothing we can do for him.' (LA, A3).

- 8.40 Service providers identified further limitations when service users had multiple vulnerabilities. One gave an example of a service user - who was repeatedly homeless, had poor mental health, learning and physical disabilities, substance misuse issues, and was also a repeat offender - to illustrate this point:

'Took him to the council but, of course, one of the council workers there [said] 'no, no duty of care to him', even with his [severe mental health issues and learning disability]. He ended up going back on the street, stole from Tesco's, got arrested and then sent down. Came back out again after six weeks, I took the case up again, took him again over to the council, the same person, [said] 'why should we look after him'... Three times he ended up going back to prison to get a roof over his head because the council had no duty of care to him. Whereas [Third Sector organisation] actually got the proof that he should have been, they had a duty of care to him.' (TS, A3)

- 8.41 In the local authority survey, six respondents reported making changes in the information and advice service in the last year *'for people leaving hospital after medical treatment for mental disorder as an inpatient'*. Reasons given focused on increased partnership work with hospitals and various other agencies. One local authority was *'trying to engage with agencies prior to discharge to prevent crisis'*, for another it involved additional training for staff working with health providers to help clients make a homeless application prior to discharge. Two local authorities have a housing officer at the local hospital to manage housing needs and homeless cases which may result in delayed discharges. For one, this meant working with Gofal Cymru:

'The referral process from hospital to Housing has improved. We continue to work closely with Gofal who have a discharge support worker based in the hospital, as well as within the Housing Solutions Team'.

8.42 Those authorities that have not made changes again explained this in terms of already having procedures in place, including having one point and appropriate caseworkers, and an existing dedicated Officer with Gofal Cymru, based with the Housing Team but working closely with the Mental Health Unit. Two local authorities did acknowledge the extra work, however, as one reported:

'Demands on our service have increased for this client group. Impact on NHS budgets means they want to discharge quickly and there is a higher threshold for them to access their services'.

8.43 The five local authorities making changes to the information and advice service for people receiving mental health services in the community explained such changes primarily in terms of closer working relationships with agencies (four local authorities), including informal meetings (one local authority), and hosting mental health colleagues (one local authority). However, one respondent to the survey reported working with some partners more than others. More specifically, they work with *'The psychiatric unit, but not necessarily primary care or CMHT'*. One further respondent explained the change in terms of focussing available support where it is most needed:

'Historically service providers... have supported a client for three to four hours per week whether there was a housing related support need at that time or not. The new model allows the three/four hours to be used where the support is needed most that week... As well as providing efficiencies this also eliminates the unforeseen consequence of service users coming to depend on their support worker and rely on their weekly visits'.

8.44 The majority of those who responded *'no'* did not elaborate. However, three local authorities offered a fuller explanation. These included that people receiving mental health services in the community were *'seen through first contact'* and that arrangements were in place prior to the new Act, including two dedicated Gofal Cymru Housing Advice Workers based with the Housing Team and *'Housing related support services which are tenure neutral to individuals with mental health needs in the community'*, provided via Supporting People funding.

8.45 Greater changes for people with mental health issues were reported in relation to securing accommodation. Overall, half of local authorities appear to have made changes in this area. In explaining these changes, five local authorities referred to the difficulties of securing accommodation, particularly due to the affordability of specialist accommodation. For example:

]There is a} significant shortfall in affordable single person accommodation. Many also have multiple complex needs which often cannot be met in the accommodation available’.

- 8.46 Four respondents referred to an increase in presentations from people with mental health issues, which can be problematic due to both the *‘long waiting lists for assessments’* and *people ‘not engaging with services’*. Two referred to the difficulties of sustaining tenancies for people with mental health issues. For example:

‘Difficulty in ensuring arranged support continues to be provided and/or client disengaging from support then leaving tenancy in jeopardy’.

- 8.47 There was little elaboration from those not reporting changes to securing accommodation for people with mental health issues. However, two commented on how change is currently being considered. For example:

‘This is a key area which we would like to develop specialist accommodation tailored to the individual’s needs’.

Rough sleepers

- 8.48 The number of rough sleepers has been steadily growing across the whole of Wales and England (Fitzpatrick et al (2017), and this was raised as a significant concern by service providers. The general consensus was this group had not really been affected by the Act, as they were already beyond a point where prevention was possible and required other kinds of intensive interventions.

[I]f you already have housing but that housing is in jeopardy, the Act is working well for you, but it’s not if you’re in that group of people that do not have housing’. (TS, A2)

- 8.49 However, rough sleeping was experienced very differently in the case study areas. In more rural authorities, perceived as: *‘a way of life, I think. We’ve worked with a lot of rough sleepers over the years that some have settled in a flat and some just can’t bear it and just... just get out there and get back...’* (TS, A1). Many of these were missed by official counts: *‘they’re more in the forest, hidden in barns...’* (LA, A1).

- 8.50 As another local authority service provider stated:

‘There’s plenty of evidence that people do sleep rough. We know that from support services, we know that from people. People come in and they’re dishevelled and ... you know that they’ve spent the night outside’ (LA, A4)

- 8.51 In smaller towns and cities, rough sleepers tended to be generally known to third sector and local authority staff. As one local authority service provider explained
- 'We don't have huge numbers of rough sleepers because we know them all. If you put us all together, we could probably name them. At the moment, as we speak, we may have six to eight in this area'* (LA, A3).
- 8.52 In cities however, the problem was reported as being much greater.
- 8.53 Across all six areas, people who were rough sleeping tended to display a complex array of needs, including mental illness and substance misuse:
- 'Their real problem is not homelessness in the sense that we could probably solve their homeless issue fairly easily. They have underlying problems, as all the homeless people tend to have ... you've got issues of alcoholism; drug addiction; antisocial behaviour.'* (LA, A6).
- 8.54 Local authority service providers reported that working with such clients posed immense challenges. For some it was because these complex cases added to the *'overload that we handle ... and we haven't got a solution for them because there isn't enough supported accommodation for them to move into'* (LA, A6). This had caused some local authorities to impose the local connection requirement quite strictly, turning people away from support though they did report a waiver being in place to allow them some flexibility. Other local authority staff reported feeling more challenged by the fact that normal procedures of issuing appointments and requiring service users to take steps towards their own recovery were often not successful.
- 8.55 Third sector service providers suggested the need for a different approach, where staff went to visit service users where they were sleeping rather than requiring them to attend meetings at local authority offices. Third sector service providers in one case study area described how staff could conduct assessments in this way, acknowledging that people with addictions or mental health issues would find it difficult to wait for assessments in local authority offices for several hours. Another third sector organisation was using humanitarian aid to reach out to rough sleepers across Wales, with a goal of helping them to re-engage with local authorities. They found that most had already had negative experiences of accessing services: *'It is the people who are entrenched homeless, entrenched street based lifestyle, they are the most difficult to get to the council'* (TS, A2).
- 8.56 For the most vulnerable rough sleepers, some third sector organisations worked hard to overcome distrust but immediately housing people as part of the process of helping individuals move on with their lives.

'the key thing for us is to try to get that person into accommodation, whether it be emergency accommodation, into a hostel ... and we'll do the wraparound support ... then we bring them in to do a full and proper presentation, but it's just trying to get them in somewhere safe where then we can actually put some wraparound services in place to actually fully assess what's their barriers for accessing accommodation...' (TS, A2)

8.57 This kind of support was not always possible however, particularly where there was insufficient temporary or hostel accommodation. Another third sector service provider explained what happened under these circumstances:

'All we can do, we've got a vast collection of duvets up in the attic, and we'll give them a duvet to keep them warm in the night, and that is literally all we can do for them. That's awful. It's since the cuts...' (TS, A5).

8.58 It was primarily third sector organisations that expressed a need for training to overcome the mutual distrust and prejudice existing between rough sleepers and local authority staff.

8.59 Respondents to the local authority survey reported that rough sleepers are a particular group that most information and advice service changes have been made for during the last year. Specific explanations for changes in the ten local authorities include greater coordination between services (two local authorities). For example, local police distributing the Housing Solution's Service Contact Card to *'any rough sleepers or citizens who have concerns about rough sleepers'*. One of these added that there was now *'improved monitoring of our response'*, and a further local authority respondent now collected more information on vulnerability. One respondent reported the introduction of a direct access bed at a supported accommodation provider, available when the bed is not needed by someone in priority need.

8.60 Among those who responded *'no'*, one local authority had already been operating a Street-Smart partnership. Two local authorities pointed out that they have low numbers of rough sleepers. One is considering changes, however in the form of a severe weather plan *'to assist rough sleeping in the county'*.

8.61 Ten local authorities also reported changes in relation to securing accommodation for rough sleepers. Four explained this through less available accommodation, as with single people, but as being more difficult due to complex needs. Two were looking at Housing First. One local authority attributed this to an increase in rough sleepers. One other local authority referred to an increase in rough sleepers but temporary accommodation often fails due to the *'high level of substance misuse'*. One respondent reported an increase in

rough sleepers but has been unable to evidence this. Two others now offer more help and support:

'Additional help to clients sleeping rough has increased, and a new more client centred approach has been adopted with additional training to the outreach team to help take homeless applications, with clients failing to engage.'

- 8.62 The majority of those local authority respondents reporting no change did not elaborate. However, three indicated that support was already in place. Two others justified their position due to lack of numbers, stating that rough sleeping was *'not a significant issue'* and that there was *'little incidence of rough sleeping'*.

Disabilities

- 8.63 Those service users with disabilities, particularly those who used wheelchairs or whose age made using stairs difficult, reported significant challenges in obtaining appropriate housing. One person had been unable to find accessible housing in the private rented sector.

'We was told to still keep looking for private, rented accommodation, but with the circumstances of this looming over us with the private landlord again when you're disabled, that's not very good because you can't make any plans. One lady we went to see, she called me out to view a property near my daughter, which is where I really wanted to be. She then refused us because they couldn't put a stair lift in for me at a later date. When I came back and spoke to the original lady who was my housing officer, told me that because I'd refused it, whereas I hadn't, the lady rescinded the offer - she said, 'We don't really have to offer you anywhere else. We've offered you one property.' That sent me into a complete and utter tailspin.' (SU, A4)

Learning disabilities

- 8.64 For those with diagnosed learning disabilities, established support existed across the local authority areas:

'If you look at people with learning disabilities in supported living, that's not about prevention, because they're never going to be homeless because there's a statutory duty from care to look after them. We've got quite a big service' (LA, A2)

- 8.65 For this specific group, challenges centred on being able to help individuals move from one level of supported housing to another, should their circumstances change. However, some service providers reported that not all those people with low level learning disabilities were diagnosed as such, which meant that they did not receive any support.

Care leavers

8.66 Eight local authorities reported making changes in the last year in the information and advice service for young people leaving care, making them one of the groups that most changes have been made in relation to. Reasons for the changes include the employment of new officers dedicated to working with 16-25 year olds in two authority areas, along with a qualified Social Worker/Accommodation Officer in one other *'specifically to deal with 16-17 year olds and young people leaving care'*. Three respondents to the survey reported improved working relationships with Children's Services. For example:

'We have better links into our Children's Services colleagues and are receiving earlier notification of YP's at risk, which helps at s60'.

8.67 One local authority referred to tenancy training for young people, and another highlighted the provision of informal workshops for partner agencies:

'We have provided many informal workshops for internal and external partner agencies to provide a better understanding of our service and the duties owed to individuals and households under the Act and to promote the importance of early intervention to prevent homelessness'.

8.68 Seven of the local authorities responding *'no'* offered further explanations. These refer to having provisions in place for more than a year prior to the second wave survey, including being *'Seen at first point of contact'* and *'Gateway Panel still managing this client group effectively'*.

8.69 Five service users interviewed in the second wave of the fieldwork had originally been in local authority care. One of these was now 25 years of age, and had been rough sleeping at the time of the first interview. In the intervening six months they had been given accommodation in a hostel for up to two years, but had then been evicted for breaking the rules and were rough sleeping once more. The other four people were aged between forty-five and fifty-seven years. Another of these was rough sleeping at the time of the second interviews, having been banned from the night shelters for smoking *'legal highs'*. One person was free from substance use and living in temporary accommodation after a long history of repeated homelessness. The two others had been placed into permanent social housing.

8.70 Service providers reported that the needs of care leavers were taken into account across their local authority areas, and this was reflected in the array of programmes available. In one area, support from both an RSL and Social Services was provided to a specific house set aside for *'care leavers, who are about ready for semi-independent living. They're*

either in employment or education and the three that we have using the house at the moment are all in university' (RSL, A1).

Migrants/BME groups

- 8.71 Common themes reported by service providers across the six case study areas were difficulties with immigration law, language barriers, challenges with benefits, difficulties in finding housing for large families and problems in placing families in the private rented sector.
- 8.72 For EU nationals, there is an increasingly complex regime regulating rights to work and to claim housing benefit. However, this was only raised as an issue in one urban authority.
- 8.73 Some service providers suggested that language barriers were a challenge. One local authority service provider acknowledged the potentially unhelpful bureaucracy involved in their own processes, as *'they're all being given the same letters really in English with loads and loads of paragraphs in it to cover ourselves in a legal sense!'* (LA, A2).
- 8.74 Service providers also indicated that large family size among some BME groups could be a barrier to securing housing, as landlords may perceive them as potentially problematic:
'So again, if you discharge into the private sector, you're saying to a landlord, 'Take on this family of eight'. Nobody wants that they're like, 'No', because you think in your head ASB already, don't you? Yes, so they're quite challenging.' (TS, A2)
- 8.75 Other third sector providers reported difficulties in placing people in the private rented sector (see also the chapter on Private Rented Sector), particularly when it was felt that some private landlords were unwilling to accept people from minority ethnic groups
'It's an identity parade, isn't it? They're paraded in front of the landlord. The landlord picks - I had a client who was a refugee, non-British, black. She was put in front of three properties. Now on paper, absolutely no reason why that person shouldn't have got a property. She was not picked three times. What that did for her self-esteem and her self-worth was absolutely horrendous and, in my opinion, it was racist but the housing options team wouldn't address that with the landlord.' (TS, A2)

Domestic Violence and Abuse

- 8.76 Follow up interviews with service users included three of the eleven people who were fleeing domestic violence and abuse during the first wave of the fieldwork. Of these, two felt they had been adequately supported, and both had found permanent accommodation in the private rented sector, although one had also amassed over £1000 in debt during

her stay at the refuge. The third person did not feel that her circumstances were understood or had been properly recognised by Housing Solutions staff:

'The abuse I was going through as far as they were concerned wasn't anything, yet you've got someone screaming at you in your face, shouting, threatening and all of that and you put up with it for years. According to them, it wasn't really abuse... It really disheartened me.... it was very dismissive, very dismissive.' (SU, A4)

- 8.77 It was not until a third sector organisation intervened that this service user received any support from the local authority. With their intervention she was placed into social housing and her circumstances have improved
- 8.78 Service providers reported that support was available in their local authority areas for people fleeing domestic violence and abuse but that there remained challenges, however, in supporting people into accommodation. These mirrored many of the broader challenges already discussed, such as the increasing complexity of people's circumstances where domestic abuse may only be one of multiple issues.
- 8.79 A small number of service providers felt that it was easier to provide support under the new Act since: *'the reason-to-believe threshold is quite a low one'*, yet there was wide agreement that this was not being applied. However, other service providers refuted this and cited the high volume of evidence they required to verify violence or abuse had occurred. Initial decisions on this largely determined a woman's trajectory through the system – those placed directly into a refuge were allocated a higher banding for social housing which helped them move into a tenancy more quickly. The issue of proof was key, as one hostel staff member commented: *'People that flee domestic violence probably don't take all their witness reports and things like that with them'*. (TS, A2) They also felt there was a lack of sensitivity in how women were treated:
- 'It's difficult enough for these people to come forward and tell people what's going on without being asked if they can stay one more night, when they're scared.'* (TS, A6)
- 8.80 Trafficking was also mentioned as an issue in three of the areas. These cases were raising particular challenges for the third sector, as they were unable to access support or housing benefit to cover refuge costs for the victims of trafficking.

Ex-offenders

8.81 The local authority survey revealed that changes in the information and advice service in the last year for people leaving prison²⁹ or youth detention accommodation were also relatively widespread (eight local authorities). Reasons include introductions of/improvements to a prison pathway, prep workers and resettlement panels. For example:

'We have joint funded a PREP worker, using transitional funding... All prison leavers are referred to the PREP worker'.

8.82 Two local authorities were focused on young people, with one having *'set up a young persons' positive pathway'*, and another having employed a qualified Social Worker/Accommodation Officer as outlined above. Three local authorities felt that further changes were still required. One of these expressed concerns about *'Still experiencing very late notification of prison leavers and/or lack of detailed risk assessments /referrals'*. One other reported that:

'Yes the pathway is there but causing issues and prison leavers are still slipping through the net and there is confusion [about] the Justice Cymru support'.

8.83 When explaining why they had not made changes in the information and advice service for people leaving prison or youth detention, eight local authorities referred to having systems in place before the Act came in or immediately following the introduction of the Act. More specifically, these took the form of a Prisoner Resettlement officer. One local authority stated that their protocol is *'currently under review'*, and one further local authority stated that they find the system flawed:

'We continue to follow the Prison Pathway for Homeless Offenders Leaving the Secure Estate, although find this flawed in many aspects. Communications from the prisons and related services are poor'.

8.84 Of the sixteen respondents in the second wave of the research who had previously been in prison, eight had been in prison within the past year. None of them reported this as a barrier to entering housing or accessing support, however two people mentioned that it made finding employment more difficult.

8.85 The Act represents a major change from the previous legislation in removing automatic priority need from prison leavers. At the same time, the Pathway recommends that a prisoner applies for housing up to sixty-six days before their release. Thus one local

²⁹ It is important to note that Welsh Government funded the Evaluation of Homelessness Services to Adults in the Secure Estate (Wales) and this project ran concurrently to this study.

authority, for example, has *'embedded that into the allocations policy so that, allocating staff, are aware that anything that comes through from housing options, at least 66 days prior to release, they go on to the list and are treated as any other application for housing will be banded accordingly...So when that person comes out, even if they need to temporarily go into temporary accommodation, they've got two months accrued as waiting time in a band on the list'* (LA, A6).

8.86 However, service providers did not feel that the National Prisoner Pathway was working as intended. Communication was often perceived as insufficient or lacking:

'The ones we do get we never see, and the ones that rock up with no notice, the ones who have completed the paperwork within the prison are frustrated that nothing's come of it anyway, so they turn up with a bit of attitude, for want of another word. 'Why am I back here, then, love? You've had all this information already.' (LA, A3)

8.87 Therefore, no service providers felt that their authority had succeeded in ensuring a smooth transition from prison into permanent accommodation. This was despite recognition that prison-leaver support remained a necessity as many were priority need for other reasons.

8.88 Some service providers stated that removing priority need from prisoners had been a mistake.

'I think not housing prisoners doesn't benefit us as a local authority elsewhere ... it's the impact on your health services and your justice service and everything else as a result of that prison leaver coming out, not being priority need, and the likelihood of reoffending, it's quite counterproductive in a sense ...' (LA, A4)

8.89 Service providers also stated that the age of service users in young offenders programmes had reduced, raising other concerns around safeguarding. Service providers reported that the prison link position³⁰ was vital given the difficulty in supporting prison leavers and the likelihood of their becoming rough sleepers, and that funding should be continued. Across all areas, emphasis had been placed on partnership working in line with the spirit of Part 2 of the Housing Act:

'We're quite fortunate, with the [prison link officer] post, at the moment we can go into prisons on our link-in, and ... you build that relationship, so you kind of get to know which ones are vulnerable. It's a huge challenge, because they're so chaotic, in and out

³⁰ Prison Resettlement Officer posts are funded through Welsh Government transitional funding

of prison. Sustaining a tenancy's very hard, so, yes, I think there's still something missing for them' (TS, A1).

8.90 Therefore, across all six areas, finding suitable accommodation for ex-offenders was a significant challenge. One reason for this was the lack of one-bedroom properties.

'Again they tend to be single people, don't they? That's why they're difficult to house and you can't use shared accommodation, and we've got very limited single person accommodation, and then there's the problem of where they can be placed' (LA, A6)

8.91 A further challenge was securing private rented accommodation. There were some logistical reasons for this, the timing of tenancy commencement and the ability to pay rent to secure it:

'But in reality, to get a landlord to accept somebody who is currently in prison is nigh on impossible, and then to get them to wait until that prison release date we haven't funds to pay that much rent, so when a property becomes available that landlord wants it filled today.' (TS, A2)

8.92 Additionally, access to RSL accommodation was reported as being problematic by some service providers:

'I need to force the housing association - now we have no stock - to take this client, and if the ... housing associations say no, the housing associations say no.' (LA, A3)

8.93 Local authorities reported that these difficulties were not well understood by either prison leavers or by the probation officers working with them:

'Well I think probation thinks that we can just give anybody a house anywhere, anytime' (LA, A2).

8.94 Finding housing was particularly difficult for those subject to Multi Agency Public Protection Arrangements (MAPPA).

'You've got MAPPA 3s/2s/1s who are supposed to be closely monitored and they're living in sheds, they're sofa-surfing. It's a huge, huge issue. ... The MAPPA coordinator's approached us ... he's pulling his hair out. He's saying, 'We've got approved properties, but then there's nowhere to move them on from those approved properties.' (TS, A4).

People with other protected characteristics

- 8.95 In the local authority survey far fewer changes were reported to the information and advice service in the last year for people with protected characteristics. In the three local authorities making changes, explanations include enhanced training in one local authority on the specific needs of this client group, and the creation of a new mental health liaison officer post in another.
- 8.96 Two local authorities reported that they had not made changes due to already having procedures in place to ensure that people with protected characteristics are *'Able to access all services'* and continuing to *'offer a commitment to equal opportunities in as diverse a manner as appropriate to the individual needs'*. For one local authority although there had not been a change to the service per se, there was a sense that there was now *'greater awareness for staff to consider these'*.
- 8.97 Only five local authorities' reported changes to securing accommodation for people with other *'protected characteristics'*. Three of these referred to a lack of accommodation in the form of *'supported accommodation'*, *'level access properties'*, and the *'PRS becoming less affordable- due to Welfare Reform'*. One local authority reported that a gender specific pathway has been developed to ensure that people with protected characteristics *'receive a full wrap around support'*. No explanation was offered from those that have not made changes.

Ex-military personnel

- 8.98 In 2017, Welsh Government established the National Housing Pathway for Ex Service Personnel. Four local authorities reported making changes in the information and advice service in the last year for people leaving the regular armed forces of the Crown. Explanations include training for housing officers *'to highlight the specific needs of this particular client group'*, and pointing out that this group is a *'priority for assistance'*. One local authority plans to undertake a scoping exercise to identify additional support needs for this group. It is intended that the review will *'include all LA services, with Housing being the primary service area'*. One respondent to the local authority survey reported working more closely with the third sector and having an Armed Forces champion within their team:

'We are working more closely with local third sector and voluntary groups focussing on veterans and have links into workers who support the delivery and review of the Armed Forces Covenant... We have a dedicated officer who is our Armed Forces Champion

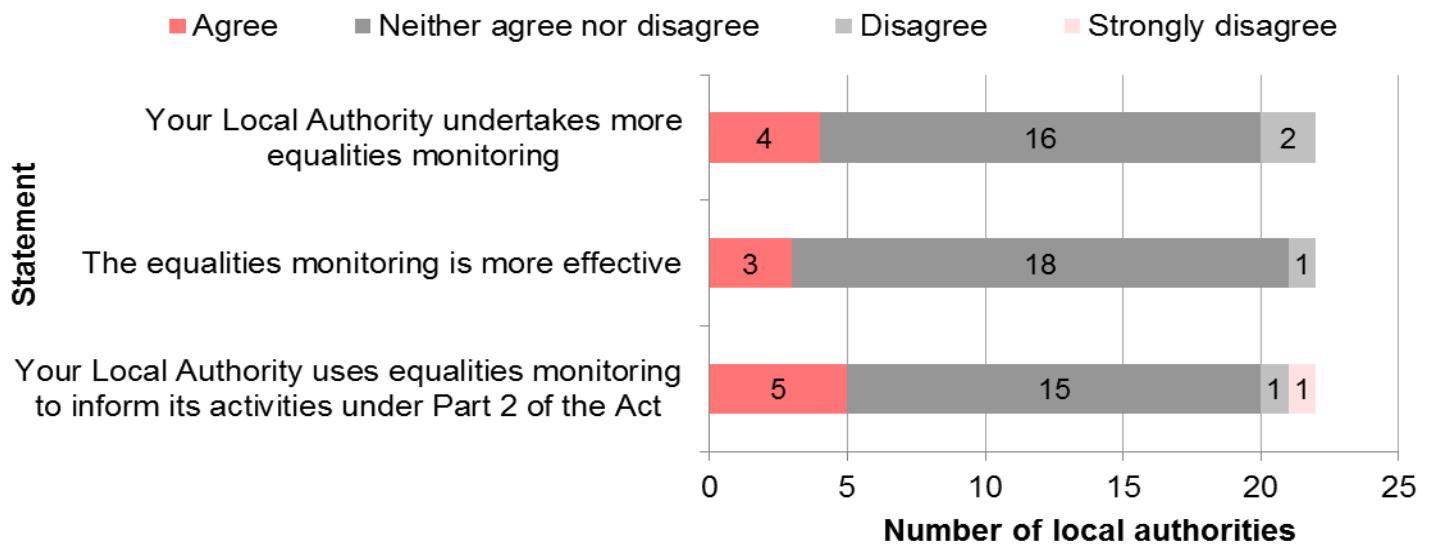
and we have worked with our local Veterans Hub to create an Armed Forces Factsheet'.

- 8.99 Reasons for not making changes to the information and advice service for people leaving the armed forces were primarily due to having processes in place (five local authorities), including priority status on housing registers and being signed up to the Covenant. However, one of these reported a plan to *'extend commitment to armed forces reservists and their families'*. Two further respondents referred to having few presentations.

Equalities monitoring

- 8.100 The Welsh Audit Office reported that equalities monitoring across local authorities in Wales is poor (Welsh Audit Office, 2018). Only a minority of respondents to the local authority survey indicated that their local authority undertakes more equalities monitoring since the introduction of the Act, that the equalities monitoring is more effective, or that the equalities monitoring informs their activities under Part 2 of the Act. However, this represents a slight increase in equalities monitoring and its perceived effectiveness since the first wave survey when, seven respondents disagreed or strongly disagreed that their local authority undertook more equalities monitoring and six disagreed/strongly disagreed that it was more effective. It is less clear whether there has been an increase in the number of local authorities using equalities monitoring to inform their activities: eight local authorities agreed or strongly agreed in the first wave survey, while six disagreed.
- 8.101 There have been few reported changes in the last year in how local authorities monitor the impact of the Act on service users (including single people, rough sleepers, people with *'protected characteristics'*, and people from other local authorities/cross border). Three respondents to the local authority survey stated that there have been changes during this time, and 19 stated that there have not. Those making changes explained them in terms of *'better data collection'*, the introduction of a Mental Health Liaison Officer to undertake mental health and well-being assessments, and a new integrated IT system.

Figure 36: Views on equalities monitoring (N=22)



8.102 This can also be seen in the responses of two local authorities who stated that there has been a change in how their authority use equalities monitoring data in the last year, while twenty stated that there has not. The only respondent to offer further explanation of this change explained that their Mental Health Liaison Officer now undertakes a mental health and wellbeing assessment.

Summary

8.103 Across the local authorities, the greatest number of changes in the information and advice service over the last year concerned rough sleepers, followed by single people, young people leaving care, and people leaving prison or youth detention accommodation. Greater coordination of services represents the main change as local authorities attempt to respond to the needs of these groups.

8.104 Respondents to the local authority survey reported the greatest number of changes in securing accommodation in the last year were for single people, followed by people with mental health issues, and rough sleepers. For each of these groups, it was felt that accommodation was becoming more difficult to secure, meaning that strategies such as HMOs and Housing First are beginning to be explored by some local authorities.

8.105 There has been a slight increase in equalities monitoring and its perceived effectiveness, although the extent to which this means more informed local authority activities is less clear.³¹ However, across authorities, robust equalities monitoring is lacking.

8.106 The majority of local authorities reported no change in the last year to the information and advice service for particular groups under s60(4). The most frequently reported changes

³¹ Collection of equalities is required by Equalities Act 2010

are for people leaving prison or youth detention accommodation, and young people leaving care. For the local authorities not making changes in the last year, this was primarily down to already having systems in place.

- 8.107 The majority of local authorities also reported no changes to the information and advice service for other groups in the last year. The most frequently reported changes concerned rough sleepers and single people. The main reasons for those that have not made changes in the last year are already having systems in place or not considering them to be necessary.
- 8.108 Although not a '*vulnerable group*' as such, single people generally did not achieve positive outcomes under the old legislation (primarily due to not being considered to be in priority need). However, it does not appear that single people are faring better since the introduction of the new Act, and this is corroborated by other evidence which shows that it is mainly single (and '*non-priority*') service users who remain without a solution after all three stages of statutory intervention (Fitzpatrick et al, 2017). Further, 13 local authorities reported that it was becoming more difficult to secure accommodation for single people. This is partly due to a shortfall in supply and issues around affordability. These issues are also compounded by the increased complexity of people's needs.
- 8.109 Service providers indicated that the number of young people presenting as homeless/threatened with homelessness is increasing, and again, they are presenting with multiple support needs including mental health issues and substance misuse. The limited support for people under 35 years of age is also seen as problematic as there are challenges in placing vulnerable people with complex and multiple needs in shared accommodation.
- 8.110 Securing accommodation for people with mental health issues was considered to be the most challenging issue by service providers. Additionally, a high number of service users reported experiencing poor mental health and that being in precarious housing circumstances exacerbates this.
- 8.111 With regard to mental health, a significant problem is that people without a diagnosis, or not receiving secondary services do not receive appropriate support. There are also challenges for people who do not meet a '*threshold*', and are not considered eligible for support by Mental Health Services. Problems also face people with more severe mental health conditions when appropriate support is lacking. Mental health issues are often compounded by substance misuse which again poses challenges for service providers.

There are also issues with partnership working between housing services and Mental Health Service.

- 8.112 The care leavers in the sample had not recently left the care system. However, previous experiences of being in the care system appeared to have long term impacts on their housing stability. It is hard to say whether such instability is a direct result of this but previous experiences of vulnerability appear to endure.
- 8.113 Challenges still exist in provision for people experiencing domestic violence and abuse, not least because of the increased complexity of individual's circumstances. In certain cases, service users raised concerns as to whether they were '*believed*' at the first point of contact, and regarding the evidence they were asked to provide. This appeared to have a significant impact on the outcome.
- 8.114 Service providers did not feel that the National Prisoner Pathway was operating as it should. Positive examples were cited where a Prison Resettlement Officer was in place. There were reports of private landlords refusing to rehouse ex-offenders and difficulties with a general shortage of (mainly single person) accommodation.
- 8.115 Rough sleeping has increased across Wales. The Welsh Government Rough Sleeper count³² estimated that 345 people were sleeping rough across Wales in the 2 weeks between 16th and 29th October 2017. This is an increase of 10 per cent (32 persons) compared with the exercise carried out in October 2016. Local authorities reported 188 individuals observed sleeping rough across Wales between 10pm on the 9th and 5am on 10th November 2017. This was an increase of a third (47 persons) on the previous year³³
- 8.116 Service providers reported difficulties in assisting people who were rough sleeping, as it was already too late to prevent their homelessness and often people had entrenched problems, for example mental health issues and substance misuse. Local authorities reported 233 emergency bed spaces across Wales. Of these, 42 (18 per cent) were unoccupied and available on the night of the snapshot count. In 10 local authorities reporting rough sleepers on the night of the count there were no unoccupied, available emergency bed spaces Service providers identified a shortage of temporary/hostel accommodation as problematic, and there is a gap in temporary accommodation which tolerates alcohol and substance misuse.

32 gov.wales/statistics-and-research/national-rough-sleeping-count/?lang

33 gov.wales/statistics-and-research/national-rough-sleeping-count/?lang

9. The Private Rented Sector

Introduction

9.1 This chapter presents data from the local authority survey, and findings from interviews and focus groups with service providers and service users across the six case study areas in relation to the private rented sector (PRS). The chapter is presented under the following headings: findings from the local authority survey; opportunities and challenges in using the PRS; lack of affordable provision; property conditions; security of tenure; credit, references, bonds and guarantors; Housing Benefit, Universal Credit and Local Housing Allowance; Rent Smart Wales and regulation; lettings agencies; and social lettings agencies.

Findings from the local authority survey

9.2 The survey showed that half of local authorities reported increased partnership working with the PRS (four a substantial increase, seven a slight increase), making this one of the areas with the biggest increases in partnership working across Wales. Ten local authorities reported no change, and one a substantial reduction. Of those local authorities reporting a substantial increase, one stated that this was in order *‘to ensure we can prevent the loss of PRS accommodation pre- eviction’*. Two respondents to the local authority survey attributed the substantial increase to having a social lettings agency, with one adding that this was supported by transitional funding, and the other stating that *‘significant resources [are] being utilised’*.

9.3 Four of the local authorities reporting a slight increase referred to particular schemes, including social lettings agencies and a tenant finding service. One further local authority had increased partnership working through using a single point of contact with the PRS which enabled:

‘Better links by the accommodation officer... landlords now have a single point of contact which enhances the relationship between the PRS and the council’.

9.4 Two of the respondents to the survey reporting no change attributed this to ongoing work, including having a *‘private landlord officer’* in place. However, one further local authority respondent indicated that they had been unable to increase partnership working due to a *‘lack of affordable accommodation’*. The respondent to the survey reporting a substantial reduction in the use of the PRS also cited affordability:

'Fewer landlords are expressing an interest in working with the LA. This is mainly due to rents being unaffordable to those on benefits. LHA rates are exceptionally low in this area and do not represent a true reflection of rents in this area'.

Opportunities and challenges in using the PRS

- 9.5 Both service providers and service users identified both opportunities and challenges in relation to using the PRS. As was evident in the initial round of interviews with service users, the majority indicated a preference for social housing, and a significant number were facing homelessness due to tenancies ending or having experienced difficulties in the PRS. However, this varied somewhat by area depending on the availability of affordable accommodation. More specifically, in two case study areas, the majority of service users reported finding it very difficult to access private rented accommodation, although they had been informed by Housing Solutions that this was their only option and some were given quotas of agents or properties to visit. One service user stated:

'Oh, it's impossible, it really is. I don't know how people manage to do it. I think unless you know a landlord, or your parents know someone, I don't think it's possible. I really don't. You'd have to be very lucky.' (SU, A2)

- 9.6 Another service user described the process of seeking PRS accommodation as a competition with others for a scarce resource, with demoralising consequences when not successful:

'They showed me this flat down in [town] and what I don't like is they showed five people, maybe, the flat, before you, and you might not get it, so it's a waste of time and money going down there to see it.' (SU, A1)

- 9.7 Some local authority service providers felt that the PRS was not an ideal long term solution to resolving homelessness since it was unaffordable for many people. They also felt that service users were reluctant to enter the PRS for a range of reasons including: previous poor experiences; undesirable or inconvenient locations of properties; poor quality of accommodation; high rents; the short-term nature of tenancies; and insecurity and anticipated eviction, as the following excerpts illustrate:

'People have been very reluctant in the past to take private, because they have had bad experiences with landlords and they're like, 'I don't want to move in six months.' (LA, A1)

'Private renting sector is only short-term they see it as, you don't get the quality, you don't get the rights that perhaps you would get in your social housing' (LA, A2).

- 9.8 However, other local authority service providers indicated that even in situations where service users were amenable to being rehoused in the PRS that some landlords were reluctant to accept tenants in receipt of welfare benefits, with complex needs, or who had previously been homeless. More significant challenges were reported with regard to rehousing ex-offenders:
- 'Trying to turn landlords around to take clients like in receipt of benefits or clients who are on the homeless register is difficult enough, and we're conscious that if we get a landlord who has got a portfolio of properties, we want to keep him on side, so we've got more than enough clients to try and get into PRS and keep landlords on side, without adding prisoners into the mix.'* (LA, A2)
- 9.9 This example from a local authority service provider emphasises that it is important to maintain good relationships with private landlords as they are reliant on the availability of PRS accommodation to rehouse people. However it also highlights a tension, where private landlords may negatively perceive some users, particularly those who have chaotic lives or more complex needs. However, this view was not shared by all local authority service providers, or service providers from RSLs and the third sector as some reported good relationships with private landlords who were prepared to support service users in long-term tenancies.
- 9.10 Service providers across sectors and case study areas made a distinction between the practices of small landlords with one or two properties, often *'accidental landlords'* who may have inherited a property, and those with large property. It was suggested that more incentives from Welsh Government might help smaller landlords remain open to accepting referrals from Housing Solutions as there was some resistance to accepting people receiving welfare benefits: *'if you look at the adverts, there's hardly any that explicitly say that they'll accept people on benefits'* (TS, A1).
- 9.11 Twelve service users, across two areas, reported that most landlords and agents would not accept people who were in receipt of benefits: *'I'd say 90 per cent won't take Housing Benefits. It's like the new acceptable discrimination and they won't take it.'* (SU, A2).
- 9.12 The notion that private landlords needed incentives to rehouse people was compared to the ways in which local authorities had received financial help via transitional funding. Service providers across sectors and case study areas suggested that incentives might counter some of the practices of landlords which excluded people who had experienced homelessness.

- 9.13 The opportunities for people in receipt of welfare benefits were seen to be limited by third sector service providers in particular. Some service providers suggested that some private landlords felt that people in receipt of welfare benefits did not make 'good tenants', or that there could be issues regarding non-payment of rent.
- 9.14 Other service providers highlighted the ways that private landlords were able to exercise control over whom they allocated property to and used sometimes unfounded judgements to choose between different people seeking a home. For example, in one case study area it was suggested by a third sector service provider that a particular homeless project had a poor reputation and some landlords would pre-judge individuals who were temporarily housed there, refusing to consider their application for a property:
- 'You've been picked up by the PRS team and they say well you're suitable for that property, you along with four other people, are going to be referred for that property. You go to the viewing and then the landlord says, 'Oh no we don't want someone from [Hostel] because [Hostel] has a reputation of being potentially chaotic, housing people in crisis, difficult people, whereas other projects have a bit of a better reputation and so they will naturally pick them.'* (TS, A2)
- 9.15 This service provider felt that the business priorities of some private landlords would always take priority over any other concerns. Others service providers across sectors also suggested that private landlords' reluctance to accept people who had been homeless was based on negative assumptions about people's behaviour: *'alcohol issues, they are drug abusers; they've got an extensive criminal background'* (LA, A3).
- 9.16 One service user described their experience of seeking private rented accommodation via a letting agent who told them that as they were *'working with Housing Options'* a particular landlord would not be keen to consider her due to previous experiences of accepting tenants via this route. In this instance the service user was refused the property they applied for.
- 'We've got the list of landlords for the council. We phone them or we go in, or the residents go in, and they're told, 'No, we don't accept DSS, we don't accept children,' and that has an impact...on the resident. We've had residents who've gone in and been told that face-to-face, and they come back feeling completely worthless, completely deflated, because they've just been brushed aside.'* (TS, A2)
- 9.17 However, rather than being based on individual or personal factors, many service providers across sectors and case study areas suggested that structural challenges, such as Welfare Reform and Local Housing Allowance caps, influenced private landlords'

reluctance to take service users. Again, the business concerns of landlords were seen to take precedence:

'There's a reluctance for landlords to work with the majority of our client group because of the welfare reforms, benefit caps, and more importantly the cap on the local housing allowance rates. Landlords can get a better deal in the general market.' (LA, A6)

9.18 The experiences of some service users attempting to access private rented accommodation through lettings agencies illustrate this further:

'Every time I phoned a letting agent they would just turn me away straightaway. I'd say, 'Do you accept housing benefit?' There was no point me pursuing with them, and then they turn around and say, 'Actually you're not able to have this property because you'll be on housing benefit.' I'm working as well, I'm working part-time, so it would just be a top up. I would explain that to the letting agents, but didn't get anywhere with that.' (SU, A2)

'None of these agencies would take on anybody with my circumstances... I think housing benefit's the first criteria. Then obviously you can't get past that anyway, because they say that the landlords won't take in people on DSS or whatever, as they call it.' (SU, A2)

'When you go there, they look at you like... Not very nice! When they know that you don't work, they're kind of not helpful and they don't want to sign the sheet, or things like that, so it's very disheartening. I'd just rather look on the internet and 'phone than go personally.' (SU, A2)

9.19 The selection processes involved in accessing private rented accommodation were considered to be problematic, with landlords ultimately retaining control and being able to choose not to rehouse people who had been homeless. A third sector service provider described an incident which they considered to be discriminatory. They talked about a family which was put forward for a private rented property, but they *'weren't chosen, predominantly because, I think, because they were black'* (TS, A2). More extreme examples were given as another local authority service provider described how one landlord had specifically said that they did not want a tenant with *'AIDS'* [sic].

Lack of appropriate affordable provision

9.20 The lack of suitable and affordable accommodation in the PRS was highlighted across the case study areas. As one local authority service provider commented *'Private rented accommodation is so hard to come by'*. Additionally, as discussed elsewhere in this

report, a common theme across the authorities was the lack of one-bedroom properties in the private rented sector as well as in relation to social housing.

- 9.21 Another third sector service provider described how in their local authority area there had been a PRS team established following the introduction of the Act. However, since its inception, this team had only facilitated the movement of two people into private rented accommodation:

'We've had two. We've had two in two years, two people from the hostel ... moving to private rented accommodation. It took an extraordinary amount of time to get them into those properties, something like six weeks.' (TS, A2)

- 9.22 Therefore, whilst there was a general consensus that opening up the provision of PRS to provide housing solutions was positive, availability and access were ongoing challenges. All authorities encountered problems of availability, and this was more pronounced in areas of high demand for housing. This shortage had existed before the Act and had not subsequently changed. Service providers concluded that it was too early to determine whether the Act had substantially affected homelessness although there were clear positives for those authorities with social lettings agencies (discussed below).

Property conditions

- 9.23 The condition of properties in the PRS varied and feedback from service providers across sectors and case study areas suggests that many private rented dwellings were in a poor condition. Several service users expressed concern about the standards of private rented housing and the potentially detrimental effects this could have on their mental health:

'The offers were basically being kind of based on the poorest areas in [town], where it was all bedsit land and basement, one bedroomed, really kind of depressing kind of places, that would have crippled me, I think.' (SU, A2)

- 9.24 Some service providers (mainly third sector) indicated that experiences of poor property conditions in the PRS were often a factor precipitating an approach to them for assistance:

'In general terms, a lot of the people that end up at the surgery for advice are coming because they have poor conditions in the private sector. Sometimes it's like low level damp or just general poor conditions, and then they're just struggling, everyone is struggling to find something affordable and suitable to move to, and that's just across the board.' (TS, A1)

9.25 Affordability, suitability and poor dwelling conditions appeared to be ongoing concerns in some local authority areas. Concerns were also centred on the potential detrimental effects of living in unsuitable or inadequate accommodation.

Security of tenure

9.26 Service users who had moved into private rented accommodation expressed some uncertainty about the sustainability of their accommodation. For example, one person described feeling anxious about the short-term nature of their tenancy and the possibility of having to re-present as homeless if the landlord chose to give notice.

'I still worry that I don't have the security where I am. Obviously it's going to be a monthly rolling contract now. At any point they could give me a month's notice, and it terrifies me, the fact that I could be thrown into this all again.' (SU, A5)

9.27 One service user had been issued a Section 21 Notice of Seeking Possession³⁴ at the time of being interviewed, and while the landlord had not yet acted upon the Notice, they reported feeling worried about not having yet found another property:

'Well, as I said, the Section 21. They did say, 'Don't worry, it's just for admin', and nothing has happened. I haven't been kicked out. ... But three of the other people in the house have been, so I'm still not completely feeling secure.' (SU, A2)

9.28 A third sector service provider explained how the options for people in such circumstances were not always straightforward:

'Lots of our casework is people coming to the end of their Section 21 notice and panicking. They can't find somewhere else to live. They can't afford standard private accommodation and they don't want the expense of court proceedings and they just sort of feel that they're being kept at arm's length and the authorities are saying well, just come back to us when you've found somewhere.' (TS, A1)

Credit, references, bonds and guarantors

9.29 Four service users reported that the requirement for background checks were problematic; whether it was credit checks, work references or previous landlord references as the following two examples illustrate:

'I thought that [Housing Solutions] were being pretty helpful, actually, as regards offering a bond, et cetera but nothing came out of that at all...She sent me to one

³⁴ A Section 21 Notice of Seeking Possession is issued to end an Assured Shorthold Tenancy if the fixed term of the tenancy has ended or during a periodic tenancy.

property and because of the fact that I couldn't get a reference from my previous landlady ... that fell through.' (SU, A2)

'They gave me a list of mostly agencies, but agencies they want references, work references... The ones that I rung, they said they hardly ever have any landlords that take housing benefits come up, so the whole thing is just, do you know what I mean, and where do they think we get the talk time to make all these calls. If you haven't got a job, do you know what I mean? It's not that easy.' (SU, A2)

9.30 It is apparent therefore, that for some service users that references and background checks often acted as obstacles to access private rented accommodation.

9.31 The issue of bonds was problematic in two of the case study areas, service users reported that private sector landlords refused to accept a bond from the local authority despite it covering the deposit and first month's rent.

'We were looking, but a lot of them were then saying even if the council does fund you, we will not take the bond scheme, and this is estate agents, this is private landlords.' (SU, A4)

9.32 Some service users had turned to family for support with a bond, but were still unable to find private landlords who would accept benefit payments:

'Well, the thing is my mum has said to me now that if I find a place she will stump up the bond, the rent in advance and the agency fees. ... But I'm having trouble finding somewhere that will still take housing benefit at the end of it.' (SU, A2)

9.33 Another service user reported having been informed that the local authority could help , but was then told funding had run out:

'When I did turn around to them and say, 'Okay, I've found somewhere... then got told, 'Sorry, we haven't got anything anymore' (SU, A5).

9.34 Service providers across sectors and case study areas reported that the financial processes operating in the PRS posed continuing challenges. For example, where landlords are willing to accept individuals who are in receipt of housing benefit, they also often required a guarantor, and there are high expectations in terms of the guarantor's ability to demonstrate financial stability and capacity:

'The home-owner guarantor needs to earn... We had one the other week that wanted the home-owner guarantor to earn three times the amount of rent.' (LA, A2)

Rents levels and (un)affordability

9.35 Across all of the local authority areas, the high level of rental charges was mentioned by service providers from all three sectors: *'the rents are too high, they're not manageable'* (LA, A1). Additionally, service users from all six case study areas also reported high rents, often set far above housing benefit rates:

'I saw a couple of properties, if you know what I mean, but they're all asking too much money for two-bedroom houses, they're asking in excess of £90 a week. It's not feasible.' (SU, A3)

9.36 For people who were employed and whose income was above the Housing Benefit eligibility threshold, it appeared to be even more difficult to financially sustain a tenancy alongside other living expenses as the following two examples illustrate:

'I struggle where I am, it's not straightforward, it's a balancing, a juggling act to try and afford things. I never have money to put away for the inevitable. I have had a problem with the car, which set me back £400, so you have to juggle things around and think, what's important this month? It's very difficult. I'd say my living costs... Food. Clothing, forget it! My shoes are on their last legs, literally. I don't have any spare income at all. ... It would be a lot easier if there was affordable housing here, but the rents are just ridiculously high.' (SU, A5)

'So since then, I've just been struggling. I'm in a one bedroom flat. It's a council flat, ex-council flat, now private rented. The going rate for those flats is about £350 a month. I'm paying £500 a month. My council tax turned out to be around about £75 a month, then I had to pay my gas, my electric, plus I had to get people to try and move in. To be honest, it feels like I'm squatting in this flat, to be honest. I'm constantly fighting the battles of my overdraft because I can't afford to pay it back, and they just keep adding interest on it every month. So, I'm really working overtime and minimum of an extra 20 hours a month, just to live a normal life, to be honest. I mean, I'm housed but financially I'm not in a good place.' (SU, A2)

9.37 The precarious nature of these people's circumstances are evident, and clearly illustrate the financial hardship and instability when earning a low income and paying a high proportion of this on housing costs.

9.38 Service providers across sectors also highlighted that the impacts of debt were long lasting, particularly in terms of previous accrual of rent arrears operating as barriers to obtaining tenancies:

'She's got rent arrears in her temporary accommodation. So, I know, as soon as that reference goes through, it's going to fail. So, I'm straight on the phone then, to the letting agent saying, listen, she's going to fail. It's down to no fault of her own. The leased accommodation is so expensive that she's working, she cannot afford it and that's the reason why she is in rent arrears.' (LA, A2)

- 9.39 This scenario was not uncommon and illustrates that high rents are found in temporary accommodation as well as longer-term tenancies. In addition, the fact that rents are rising was an additional challenge in terms of using the PRS since local housing allowance rates were not adjusted accordingly:

'They've only gone up by about 0.5 per cent across the board, but they are going up and obviously our LHA rates are not going up to reflect that, so obviously the discrepancy between the LHA rates and the market rates is getting larger.' (LA, A3)

- 9.40 Overall, there appeared to be numerous problems in relation to the financial arrangements involved in securing accommodation in the PRS, from high and rising rents to the provision of bonds, guarantors and fees.

- 9.41 One service user felt that some landlords who accepted people in receipt of benefits as tenants were sometimes unscrupulous:

'I think, when you get the landlords who take DSS, they're usually dodgy, and they don't want any inspections, so it's sort of catch-22.' (A2)

Rent Smart Wales and regulation

- 9.42 Rent Smart Wales process landlord registrations and grant licences to landlords and agents who need to comply with the Housing (Wales) Act 2014. The benefit of Rent Smart Wales was articulated by service providers across sectors (but predominantly by local authority service providers) in terms of being able to hold private landlords to account regarding the quality of accommodation. .

- 9.43 One local authority provider felt that Rent Smart Wales had made a positive impact in terms of requiring landlords to offer rented properties of a particular standard:

'I've talked about Rent Smart Wales here as well which has enabled landlords... It's an initiative that makes sure that the accommodation people get, as well, is up to scratch...but for us, it offers assurances that when somebody goes into accommodation, it's of a certain standard and it just helps people, you know that they're not in somewhere that isn't conducive to getting them to want their own place, keep it

nice and clean, tidy up, or however they want to live. It's just a safe, clean place to live.'
(LA, A1)

9.44 This service provider spoke positively about Rent Smart Wales in terms of the implications for landlords to improve and maintain standards. In this sense, Rent Smart Wales was seen to offer assurances that landlords would be obliged to comply.

9.45 However, although some service providers felt that the introduction of Rent Smart Wales was positive, others saw it as creating new challenges:

'It's been brought in for private rented landlords and it, to my mind, is just not fit for purpose. Basically, what it's done is it means that all private landlords who rent properties out in Wales have to register themselves as being fit and proper, however it has no reflection at all on the properties.' (TS, A4)

9.46 This service provider raised a critical point as whilst registration in itself can be a useful process, if there is no quality standard in terms of the properties', then as a regulatory process it is open to exploitation, or rather it leaves tenants open susceptible to living in poor dwelling conditions.

9.47 Some local authority service providers felt that an unintended consequence of Rent Smart Wales is that smaller landlords were selling their properties and leaving the PRS altogether, resulting in eviction notices being served to tenants as *'landlords don't want to register or they don't want to manage the tenancies'* (LA, A4).

9.48 Some service providers reported being unable to assist people with rehousing where landlords were not registered with Rent Smart Wales:.

'We've got clients coming in and saying, 'we've found accommodation' but we're unable to assist them into that because the landlord is not Rent Smart Wales, so we're unable to give bond and rent advance assistance. So, then they're feeling disheartened by the fact that they're trying, we're asking them to try, and then we're saying, sorry, we can't assist. That's quite difficult then. There's nothing we can do to stop that.' (LA, A2)

9.49 Therefore, whilst the requirement for regulation is, overall, a positive aspect of the Act, there are gaps and the enforcement and regulatory aspect of the structure was seen to be lacking.

Working with private landlords

9.50 One local authority had restructured Housing Solutions to create a team dedicated to working with private landlords. In other authorities, there were PRS Officers who were responsible for liaising with private landlords and letting agents. This was seen to be working very well:

'We've got a private sector leasing officer, so he mainly deals with the majority of the private rental landlords... the agents are pretty good. We've got quite a good relationship with one]... They will ring us and say, 'I've got this tenant, looking to evict because of this, can you give us any assistance?' We send letters out to the tenants, and pretty much that's our prevention done, sending a letter. It makes them contact the landlord, and it's sorted.' (LA, A3)

9.51 Indeed, the speed at which local authority housing teams could respond to situation was commented on by several local authority service providers. This was framed in terms of enhanced relationships between local authorities and private landlords as well as the ability to intervene more effectively to prevent eviction. One service provider recounted a situation when they were able to respond to a landlord query and effectively save a tenancy:

'Last week we had a phone call from a landlord, who said, 'There's lots of police and ambulances outside my property, I'm being told by a carpet fitter. Do you know what's going on?' So, we went out and found one of them had been sectioned. The next day, the support was in, Mental Health Services from homeless side were in there, trying to work out exactly what the issues were and what we could do to help and he's still there.' (LA, A6)

9.52 Clearly in some authorities, the change in the relationship between private landlords and Housing Solutions was positive with increased information sharing, advice giving and good practice in terms of more effective negotiations and mediation. Ultimately, these resulted in increased opportunities for tenancies to be sustainable. This was seen as part of the culture shift resulting from the Act.

9.53 In one authority it was suggested by a local authority service provider that once a service user was moved to private rented accommodation, it was helpful for the local authority to form a relationship with that landlord in order to support both parties. This type of approach, to a more relationship-based practice where partnership was central, began at the point where an individual was put forward for a property. So, for example, if the service user had a history of accruing rent arrears and/or non-payment of bills, the

Housing Solutions team could ensure the landlord was aware (with the tenant's permission) in order to be alert for warning signs. This could trigger timely support to both landlords and tenants and encourage private landlords to engage.

9.54 The role of mediation was clear but positive stories from service providers across sectors were outnumbered by negative ones which highlighted that often people who lived chaotic lives, and/or had multiple and complex needs, left it too late before contacting services for help. The benefit of mediation appeared to be limited by the ability of the service user to ask for help, or in the case where service users do not have regular contact with services, by the lack of identification by service providers. As with other aspects of housing and support, there are often many variables that influence the success of a particular intervention.

9.55 In addition, to help people manage and maintain their tenancies in the private rented sector, the provision of floating support was seen as critical by many service providers across the three sectors:

'I think if you're going to be putting people on PRS systems, then you need to have tenancy support workers, because you're putting someone into a flat and then you're leaving them there. The landlord's not there. The landlord doesn't live there, so no-one's managing that person. As far as we can do it at our end and help them and - the Act can work very well for some people but it depends on the person. Putting someone into a flat, giving them a key, it doesn't mean anything at all.' (TS, A2)

9.56 Overall, there were many different views on the value of floating support for people accommodated in the PRS (about how and when it should be provided and to whom). There was a clear agreement, however, that it was critical to supporting and enabling sustainable tenancies.

Letting agencies

9.57 Within the spirit of the Act, an action considered to be a reasonable step is to liaise with lettings agencies. However, in cases where a private landlord was sourced via a letting agent, there are fees to be paid³⁵. As one RSL service provider explained, this could act as a significant barrier for service users as: *'An estate agent's fees is a week's giro'*. (RSL, A1)

³⁵ Welsh Government has announced plans to abolish lettings agency fees
<http://gov.wales/about/cabinet/cabinetstatements/2017/feeschargedtotenantsprivatesector/?lang=en>

9.58 Two service users raised the issue of agency fees as a further barrier to accessing accommodation in the private rented sector:

'There was only one estate agent that would consider me but it was £250 just to consider. ... £250 just to apply to get a house!... You've got to pay the agency fees up front and they're non-refundable. If you fail the credit rating or the property doesn't suit you or something like that then you don't get it back!' (SU, A4)

9.59 Such practices were also noted by service providers across sectors: *'unscrupulous letting agents popping up all over the place with 'we want your £500 finder's fee' (TS, A2).* Supporting the service users' claims, this service provider noted that sometimes the individual does *'not get the accommodation and loses the finders' fee'.*

9.60 Third sector service providers in particular highlighted how working with letting agents and private landlords was problematic for a number of reasons because not only may there be agency fees, that references and rent are also usually required in advance.

9.61 However, one positive example of a lettings agency was cited.

'We've just been to a meeting this morning with [Lettings Agency]... They don't judge anybody, they're quite good. They'll say, "I'd rather keep him closer to us, so we can just keep an eye." They're very good like that. We work well with them... they've taken 80 per cent of our clients.' (LA, A1)

Social Lettings Agencies

9.62 In one local authority, a social letting scheme, separate to the local authority, was established in the area by a third sector provider:

'We're also quite fortunate here as well, because we've got the [K] letting scheme... that is the social letting agency, and that is quite good, because it means that if anyone is made intentionally homeless, or the decision is that they're intentional, we evict for whatever reason, we've got another avenue there to explore for accommodation for them, which can be helpful.' (TS, A2)

9.63 In other local authorities there was more internal investment in social lettings agencies and these were viewed as partially facilitating a solution to homelessness. Particularly encouraging in this example is the changing nature of the relationship between the local authority and private landlords over a period of time:

'So, the other angle for us is our social lettings agency ... we're trying to expand that and offer a package to landlords... You know, 20 years ago... We were prosecuting

landlords. Now today, we're working with them, managing their properties, educating them.' (LA, A4)

- 9.64 As such, the nature of the relationship between this local authority and private landlords had changed significantly, and was continuing to do so. In this area, the social lettings agency had grown substantially *'from taking on two or three properties to a situation now where we manage about 150 private rented properties'* (LA, A4). The team managing this service considered it to be successful and innovative, whilst maintaining an ethical ethos.
- 9.65 Overall, social lettings agencies were seen as a positive structure. Moreover, where they existed, good practices were described in relation to relationships with other service providers as well as terms of collaborative projects with private landlords (such as shared accommodation projects for under-35s) and in terms of standards. This enhanced existing provision and the availability of floating support or targeted support enabled proactive assistance when tenants faced difficulties.

Summary

- 9.66 The private rented sector has doubled in size over the last decade in Wales (to 15% of all dwellings), (Fitzpatrick et al, 2017). Local authority respondents and service provider participants acknowledged the need to use the private rented sector to prevent and relieve homelessness. However, significant concerns were raised with regard to how this works in practice. Concerns centred on: the unavailability/shortfall of accommodation, particularly one bedroom properties; the cost (unaffordability); insecurity of tenure; poor condition of some properties; unwillingness of private sector landlords to accept people who were in receipt of welfare benefits.
- 9.67 In addition, there are obstacles to people accessing the private rented sector: for example, being able to provide references/credit checks; lettings agency fees and unscrupulous agencies and landlords; fears about the impact of Universal Credit.
- 9.68 Additionally, some service providers were concerned about the lack of experience of private landlords in managing the tenancies of vulnerable people, since historically private landlords have focused on the business/resource element of housing management and not the welfare need of tenants.
- 9.69 There were also concerns about the sustainability of private rented tenancies for people in receipt of welfare benefits and on a low income: again this was related to affordability and rent levels. There were some examples of severe hardship among service users in receipt of a low income living in the private rented sector.

- 9.70 Additionally, limits to local housing allowance and benefit payments to people under 35 created further difficulties in placing people in the private rented sector.
- 9.71 Where social lettings agencies existed, this was seen to be positive and useful to develop successful partnership working with private landlords.
- 9.72 Views on Rent Smart Wales were mixed. It was seen to have created a regulatory framework for the private sector, but also to have created some challenges. Challenges centre on the reluctance of smaller landlords to register (therefore remove their properties from the market), and that it has not implemented a minimum quality standard.

10. Welfare reform and other structural challenges

Introduction

- 10.1 This chapter centres on the structural challenges and opportunities which impact on the implementation of the Act. In particular, austerity and Welfare Reform are explored in relation to ongoing challenges (for instance, budget cuts and the Bedroom Tax) and the anticipated effects which will arise from the widespread implementation of Universal Credit. The shortage of housing provision more generally is explored along with considerations of particular groups in housing need (such as the under-35 age group) and in relation to location and the geography of Wales. The chapter is presented under the following headings: Welfare Reform, austerity and budget cuts; Universal Credit; Time delays in the Universal Credit system; Changes to Housing Benefit; The Social Services and Well-being (Wales) Act 2014; Renting Homes (Wales) Act 2016; Personal Independence Payment (PIP) and Employment and Support Allowance (ESA); The Bedroom Tax; Local Housing Allowance; Austerity and budget cuts; Workforce challenges; Availability of resources: finance and housing stock; Lack of provision for vulnerable groups and people with complex needs; Shared accommodation and the under-35s; Problems with shared accommodation; Alternative solutions for the under-35s: container houses; Location and service provision; Supporting People: moving away from specialisms; and Lack of Social Housing Provision.

Welfare Reform, austerity and budget cuts

Welfare Reform

- 10.2 The subject of Welfare Reform in addition to the effects of austerity provoked considerable discussion among service providers across sectors and case study areas. There was a common view that the Welfare Reform Act, the introduction of Universal Credit and Personal Independence Payments for example, were going to create difficulties for people and consequently would affect homelessness service providers:
- 'We shouldn't forget that The Welfare Reform Act has really thrown a big bucket of cold, dirty water on it, with people getting sanctioned and all sorts of different things, and forcing them into crisis. It's just made it a lot worse hasn't it?'* (RSL, A3)
- 10.3 Welfare conditionality and the climate of sanctioning, specifically in relation to people who are homeless or at risk of homelessness, had resulted in increasing the challenges that people face. Some service providers – across sectors – felt that the political motives behind the implementation of systems, such as welfare conditionality and the UK

Government's impetus is to make financial savings through continued financial reductions:
:

'There isn't the same drive now. I felt that there was a political drive from the actual Government, to deal with problems prior to that. We are now dealing with cutbacks, and that's the political drive. Pay less, rather than making sure people get what they're entitled to, so there isn't the political drive from London, in that respect, so we're not corporately reacting to that in the same way as we were previously.' (LA, A1)

Universal Credit

10.4 Universal credit (UC) was discussed by many service providers and was seen as part of Welfare Reform which carried unknown outcomes as it was still in the early days of implementation. There were concerns for the future as more people will become recipients of UC. One third sector service provider bluntly described their experience of working with service users in receipt of UC:

'We've had three people so far. All of them have [messed] up big style. They only get 152 quid for the month or these people did. It's gone. The end of that month is a long way away.' (TS, A1)

10.5 The view that service users would struggle to manage welfare benefits received via UC was a common view among service providers. It was also anticipated that this would lead to service users accruing rent arrears, a common factor leading to homelessness. Whilst there was goodwill and empathic practices to support tenants in receipt of UC who were not adept at managing their finances, the lengths that service providers could go to were considered to be finite and time-bound. One RSL service provider explained that their organisation's position was to try to help those in receipt of UC who accrued rent arrears, but there were concerns about their capacity to support increasing numbers of people receiving UC: *'when more and more become UC claimants you can't be so nice to them and try and hold their hand through it.'* (RSL, A4)

10.6 So, whilst organisational policy existed to assist tenants who were accruing rent arrears, the implication of the widespread rolling out of UC would clearly influence policy and practice and further restrictions were envisaged. It appears that such implications are not limited to particular agencies, but will affect to all service providers in homelessness where service users receive it.

Time delays in the Universal Credit system

- 10.7 Administered by the Department of Work and Pensions (DWP), the UC system was also criticised by some service providers:

'All the agencies, you're working with Shelter and people like that, they're doing a lot of work and trying to tell people about Universal Credit, but what I would say is, the information from the Department of Work and Pensions is misleading, because they do not do what they say they're going to do. Things don't happen when they say they're going to happen.' (LA, A1)

- 10.8 Other service providers described such difficulties more specifically in terms of delayed payments which would take between six and eight weeks from the initial claim. As such, the time delays in payments were problematic in mitigating homelessness as it was felt that the majority of private landlords would be unable or unwilling to accommodate this. Therefore, the repercussions of UC and delays in administration can be understood to be incongruent with the objectives of the Act, specifically person-centred practice.

Changes to Housing Benefit

- 10.9 The current system of administering housing benefits to each local authority was generally seen as helpful by service providers working directly with finance and welfare benefits. However, there were concerns about the future intention to transfer this function to the UK Government with local job centres to be tasked with administering benefits. These concerns were framed in terms of the potential loss of control and diminished capacity to resolve issues as they arose:

'It's going to be shifted to [UK] Government to make the payments... working via... the local jobcentre, and they're not prepared for it to start with. Getting access, they are the civil service; very, very difficult to get access... at the moment for me to get in touch with, because the decision-maker might be in Nottingham, and the person lives in [Welsh village], wherever, you know? That, for me, would be the most foreseeable challenge.' (LA, A1)

- 10.10 Service providers across sectors also identified the aim to centralise housing benefit as another structural change that could potentially negatively impact upon payments being made in a timely manner. Delays or difficulties in negotiating matters pertaining to housing benefits were cited as a future challenge by service providers across sectors and case study areas.

The Social Services and Well-being (Wales) Act 2014

10.11 The Social Services and Well-being (Wales) Act 2014 was identified as resulting in important policy change. However, the way in which the legislation had been introduced was criticised by service providers in relation to the timing of their introduction and a lack of synchronisation. Some service providers felt that this compromised the Act's implementation:

'The preventative agenda of the Housing Act, and then the Social Services and Well-being Act. All these impact on each other, and I think some of the times acts are considered in isolation, whereas perhaps they should be considered and rolled-out together.' (TS, A4)

10.12 There was widespread consensus among service providers across sectors and case study areas that the legislation on homelessness, social services and health and social care could have been implemented in a more cohesive way, noting the overlaps and shared agendas.

10.13 Both Universal Credit (UC) and Local Housing Allowance (LHA) were also considered to be problematic in relation to the PRS. There were problems with people unused to budgeting spending UC payments before paying rents, resulting in rent arrears. This was also raised by service users (as well as service providers across the three sectors). The payment of UC directly to claimants was considered to act as a further deterrent to private landlords accepting people in receipt of benefits:

'Well, they've changed the system now, isn't it? They pay the person, because I do know a lot of people who have actually spent, even for their housing association property, the rent's come to them and they've spent it, so landlords don't particularly... They just don't want people on housing benefit.' (SU, A2)

10.14 The widespread implementation of UC was described as likely to *'fail a lot of people'* Significantly, a number of service providers across sectors and case study areas felt that UC would lead to increases in homelessness:

'The majority of people outside of these services then, they're going to struggle. Then they become homeless because of rent arrears and we're going to be affected because there is no hostel rooms anymore. It's constantly a big thing where homelessness is increasing.' (TS, A2).

10.15 Most service providers indicated that rent levels were often not covered by Local Housing Allowance (LHA):

'The Local Housing Allowance for a shared room is just about £60, you'd be lucky to get a shared room in [Y] for £75-£80. A one-bed rate is £90, it's probably £450-£500 is the lowest end of rents for a one-bed flat in [Y], you're looking at £650 or more... that is the main problem that we've always, always had.' (TS, A5)

Renting Homes (Wales) Act 2016

10.16 In addition to the new legislation around housing and social care, service providers drew attention to the Renting Homes (Wales) Act 2016. Essentially, when implemented, this Act will directly affect the lives of people who rent their home in Wales by changing the types of tenancies that landlords, including RSLs (or 'community landlords' as they will be called under the Act), are able to offer. Therefore, some service providers anticipated that there would be additional changes which would impact on service users:

'We'll have to review all our assignments, joint to sole policies, everything regarding our tenancies...It'll be better for the tenants or the contract holders, as they will be called because, for instance, with joint to sole tenant, if one tenant gives notice now it brings the whole tenancy to an end. It'll allow more flexibility... so it'll prevent homelessness.' (RSL, A1)

10.17 This service provider noted that there was no direct link with the Housing (Wales) Act 2014 although there were clauses in the incoming legislation that overlapped with those of the Act:

'I'm also surprised that there's a sheltered housing section in the Act and you know temporary exclusions from hostels and so on, they will be allowing for those but I was surprised that there wasn't a link...to the Housing Wales Act and homelessness prevention...I thought, well, there's already a system and a duty in place isn't there... I was quite surprised because it was the policy, you know, obviously it's the Welsh Government's policy section that works on the legislations but they obviously hadn't even considered the fact that some duties are already in place' (RSL, A1).

10.18 As such, silo working was considered to have resulted in the lack of a direct link between each piece of legislation; a similar finding to the previous discussion regarding silo working across the statutory sectors of housing, health and social care.

Personal Independence Payment (PIP) and Employment and Support Allowance (ESA)

10.19 Some service providers reported that the changes to the welfare system, specifically the introduction of the Personal Independence Payment (PIP) to replace Disability Living Allowance, as well as the challenges resulting from the administration of the Employment and Support Allowance (ESA), has had an impact on homelessness work as people's circumstances were not '*straightforward*' but more complex than ever. It was felt that the changes to these particular benefits were adding to the challenges associated with Welfare Reform:

'I think all the changes that are happening are detrimental to giving a service to the clients. Other benefits that are changing, Disability Living Allowance [DLA], changing to this Personal Independence Payment. Things are becoming more difficult.' (LA, A1)

10.20 Specific issues, such as mental health, which are increasing commonplace, were seen as adding to the complexity of providing support when other structures impacting on people's lives proved challenging. The primary example is of how people who had once been in receipt of disability benefits were now in receipt of the Employment & Support Allowance (ESA) which carried expectations in terms of job-seeking. These expectations were considered by some service providers to be untenable for people with mental and physical health problems.

10.21 The problems associated with welfare administration are potentially an outcome of austerity and budget cuts in terms of diminishing support services (in this case, mental health services) which some service providers across sectors noted as '*a distinct challenge that we're facing*' (TS, A1).

10.22 The sanctions resulting from the current benefits system were talked about in general terms of the problematic and often chaotic nature of the lives of people who commonly presented as homeless. The following vignette was offered as an example of how this system fails service users setting this within the context of Wales, its geography and infrastructure:

'She can only make a claim for JSA online. She has to do the 25 hours-a-week job search. She doesn't have a computer. She lives in a [X], which is 13 miles from the nearest library which has access to a computer, so she would have to go either to the jobcentre in [Y] or to the library in [X] to make it.' (LA, A1)

10.23 More importantly, for someone with an already chaotic lifestyle, these kinds of demands are felt to be unachievable. Other service providers reported how people were struggling with the current system, identifying the low rates of PIP and ESA as a particular issue:

'Families are struggling, the carers are struggling. Families with small kids, I've seen more and more that we've had to go to the food banks and that's through a carers assessment of need.... they're not getting paid to look after them, and financially they're wrecked when they're having to come as far as [X town] maybe.' (TS, A6)

10.24 In combination, the issues of regional infrastructure (including travel costs and inaccessibility), the current system of welfare benefits (specifically, the low rates of benefit payments) and other factors associated with homelessness highlighted the problem of the 'revolving door' for a significant proportion of service users.

The Bedroom Tax

10.25 Whilst some of the discussions with service providers centred on budget cuts and the welfare benefits system, the introduction of the Bedroom Tax was frequently cited as being problematic across the case study sites. The distinction that the Bedroom Tax was a UK Government policy, rather than one of the Welsh Government, was acknowledged:

'I think the challenge that we've got in Wales is that things like benefit cuts, bedroom tax, are all things that come from Westminster and that the Welsh Government, well certainly Welsh authorities haven't got so much control over.' (TS, A1)

10.26 A significant problem in all but one of the six case study areas was the availability of appropriate accommodation for single people compounds the effects of the Bedroom Tax::

'Going back to the Bedroom Tax, which in itself was an issue because you didn't have ...the stock to offer in the location that people needed. The vast majority of our stock is three-bedroomed, especially in the villages and if people wanted to stay where they had their support network and family and services that they're used to then obviously they're not going to want to move.' (RSL, A1)

'We see it day in day out. People are coming in, want to downsize, because they're under occupying subject to the Bedroom Tax, and even though we give them highest priority we can on the housing register, there's nowhere for them to go.' (LA, A3)

10.27 There are clear implications to rehousing people away from established support networks. This was considered to be particularly problematic for young people or people with additional and complex needs.

10.28 Prior to the Bedroom Tax, larger properties in low demand areas were often used to rehouse single people. However, service providers reported that this no longer happens as affordability checks would prevent this. A third sector service provider described the situation of someone who prior to the introduction of the Bedroom Tax was placed in two bedroom accommodation after being street homeless:

'There's a gentleman, I've know this gentleman for 20 years, 20 years I've know this guy. He's in a flat. He's got a two-bedroom flat but he still begs on the streets of [X town] because they stripped him of the cost of one of the bedrooms, even though the council placed him there after being street homeless but he goes and begs to get the money for the top up'. (TS, A1)

10.29 This service provider thought that this practice was *'setting people up to fail'*. The Bedroom Tax was depicted as a structural flaw that had led to policy and practices which added to the problem of homelessness.

Local Housing Allowance

10.30 For some areas, the Local Housing Allowance (LHA) had created barriers to accessing affordable accommodation even for people in receipt of welfare benefits. This was due to the LHA cap being lower than the average rents and so there was a gap in terms of local need and affordable housing stock:

'I think affordability is one of the main challenges for us as a social outlet at the moment because I don't know if you're aware but the local housing allowance cap in this area is very low. ...So, in some of our areas ... the two-bedroomed properties are out of reach of some people on the housing register, even with benefits because the cap, the benefit cap is under the weekly rent'. (RSL, A1)

10.31 The introduction of the LHA was considered to have affected some groups of people more negatively than other. Some service providers suggested that families, in particular would be adversely affected:

'You'd settle a family into a private rented accommodation and then the benefit cap came in and different things, they can't meet that rent anymore ...you think - oh the family, you're just about to finish supporting them then all of a sudden there's such a big change to their income, they're in flux for quite a long time then waiting for different decisions on different things (for example, UC) which has effect on housing.' (TS, A6)

10.32 However, other service providers reported that single people would also be negatively affected and unable to afford housing:

'You're looking at about £40 difference between what they're going to be getting in housing benefit and what the rent will be. If you take a single person getting £72 a week on JSA, then over 50 per cent of their income will go on meeting the gap in the housing benefit.' (LA, A6)

10.33 The LHA was considered to have significant negative implications for a range of service users in either creating debt, rent arrears or compounding poverty. It was depicted as having created a barrier to affordability and for some, clearly, an impossible situation.

10.34 The under-35s were also identified as a group who would be particularly worse off as a result of reductions to the levels of Local Housing Allowance. In the words of one third sector service provider:

'The other problem we've got now is the slashing of benefits for 18 to 21-year-olds. I honestly do not understand what they think will happen other than an increase in crime and an increase in homelessness.' (TS, A1)

10.35 This quotes point to the multiple problems potentially resulting from cuts to welfare benefits. During a focus group with third sector service providers the lack of access to financial support and minimal options for young people were considered to need an immediate response by the UK Government:

'Obviously the [UK] government have seen the increase on homelessness from [younger] ages, and they still haven't acted on it, they've gone the other way and made it harder by saying you can't have any under 21, you can't do everything else, you can only have this for housing benefit and everything else, they are making it harder for them. Of course, they don't go into apprenticeships anymore, they don't go into army, they don't go into work necessarily because of the higher unemployment, so the government have got to think of something.' (TS, A3)

10.36 However, as the welfare system and housing infrastructure are influenced by the actions of both UK Government and the Welsh Government, it was noted that there is 'uncertainty' resulting from 'two different agendas and two different governments' (LA, A6). Therefore, it is concluded that a confusing and uncertain picture was facing young people and the services which support them.

Austerity and budget cuts

10.37 Austerity and ongoing budget cuts were identified as significant concerns by service providers. The impact of budget cuts was reported as being wide-reaching as no sector was excluded. In particular, service providers recounted many examples of third sector support services which had closed. Without exception, these were perceived to have been closed as a result of austerity measures. In the words of one third sector service provider:

'Cuts are coming left, right and centre in terms of support. We've certainly noticed a drop-in support over the last couple of years, which is really challenging'. (TS, A2)

10.38 Local authority service providers were acutely aware of the cuts in third sector budgets (which limited their ability to provide support), and the problem of short-term funding leading to services being subjected to gatekeeping to manage demand, as one commented:

'A lot of it is being picked up by the charities and the charities stagger on from funding to funding so they're putting in Big Lottery funding bids which keeps them going for three years and then they need to fund it again and fund it again. They're papering over the obvious cracks, there seems to be a lot of gatekeeping taking place, it's difficult to access people into services'. (LA, A5)

10.39 Service providers across sectors and case study areas reported that many support services available to help those experiencing mental health issues or escaping domestic violence and abuse had been significantly reduced. The issue of how support for people escaping domestic abuse was being addressed in relation to the budget cuts was contextualised by one third sector service provider:

'Yes, we can legislate, but actually who is policing that and with no Legal Aid, no legal representation and with limits and diminishing services...there's nobody there fighting for those rights, and housing is included in that.' (TS, A1)

10.40 However, it was not only third sector agencies which were affected by reductions in funding as statutory providers also had to review service delivery in light of budget cuts. As a result some local authority service providers were also reported to be under-resourced as depicted by the following RSL participant:

'They're all restricted by lack of resources, lack of accommodation, the stripping back of actual social care in the community. It's also difficult to get an appointment with the council to register as homeless when their office is shut.' (RSL, A1)

10.41 Despite the challenges resulting from budget cuts, in one local authority the Housing Solutions team considered that they had coped well:

'It's been a tough couple of years I think and staff have coped very well...Of maintaining the quality of work. I think we're there or thereabouts. We've got good staff and they get it and they're doing their best.' (LA, A1)

10.42 It is evident therefore, that service provision (in terms of practical support and advice) was affected by budget cuts. Specific systems for service users, for example financial help, which had been removed were identified as the Community Care Grant and Discretionary Assistant Fund (DAF). As such, the impact of austerity was not seen to be limited across sectors or by service user group. Moreover, service providers expected the consequences of austerity and budget cuts were to worsen in the future when the full effects of Welfare Reform would be felt.

Workforce challenges

10.43 Several of the organisations across the case study sites had experienced high staff turnover during the introduction of the Act and subsequently. This was frequently described as being disruptive to services by providers, but viewed as an inevitable response to significant policy and practice changes. In the words of one third sector service provider:

'There has been a constant turnaround of staff, so there's never a settled period of time where there's good, qualified, experienced people dealing with these issues.' (TS, A2)

10.44 In one large case study area, the number of new and/or temporary staff in Housing Solutions was highlighted as being particularly problematic as these officers were considered by stakeholders in partner agencies to be under qualified or lacking in experience:

'To be working in that environment because they've come from something completely different and then six months down the line, they're gone because they're all temporary jobs, they've gone and they're re-employing new people. So, there's an element of chaos within that sort of structure.' (TS, A2)

10.45 This was seen to be particularly problematic for support providers (both RSLs and third sector agencies) as it was believed that the new staff did not understand their partners' role and remit: *'the new staff members don't have that understanding of the projects that are there'*. Consequently, service users were not able to access the appropriate interventions as they are not signposted or referred to support providers.

10.46 As such, staff turnover or the inexperience of staff within Housing Solutions was considered to bring challenges. These included compromised partnerships with RSLs and the third sector providers, gaps in knowledge, inefficient advice giving and poor signposting.

Availability of resources: finance and housing stock

10.47 Several service providers across sectors and case study areas noted a general lack of resources. In the words of one local authority service provider, services are *'only managing to help the few at the moment, rather than the masses, and it all comes down to the resources'* (LA, A4). The consequences were acknowledged to be varied and affected the ability to deliver a person centred service:

'The barriers, I'd say, is we haven't got much money. I've just had a lady now with six kids who is being evicted, who had fallen behind substantially with rent arrears; she had £4,000, but managed to scrape together £500. My boss... allowed me this money as an incentive, and she's allowed to pay back £25 a week... But we can't do that for everybody. Our worry was, okay, he evicts her, he goes ahead; where will we put a lady with six kids?' (LA, A1)

10.48 In this instance, the issue of resources was connected with prevention funding (by the local authority paying the accrued arrears) and in terms of the lack of larger, family-sized accommodation. Limited resources were thought to restrict the ability to assist service users at the prevention stage:

'Unless the funding's there we can't deliver it. As much as you've got the staff willing to do it, if the services are not available... Our hands are tied and it's a sense of, yes, okay, we want to help and we want to be person-centred and do the Equality Act and make sure everyone is treated to the best of our ability but you can't in limited timeframes.' (TS, A2)

10.49 Clearly, the lack of available resources (prevention funding, funding more generally for daily operations, appropriate and available accommodation, staff time) was an enduring problem that was outside the remit of the Act.

Lack of provision for vulnerable groups and people with complex needs

10.50 The lack of appropriate support and accommodation available for vulnerable groups and people with complex needs was raised as an issue by service providers across sectors and case study areas. Challenges were reported in sourcing accommodation for people with mental health support needs, for prison leavers with additional needs (learning

disabilities, physical and health needs) and more. Specific issues in relation to the scale and nature of support needed by people with complex needs were identified in terms of a lack of capacity and staff shortages:

'There's lack of facilities for people to go. We've got a few residents here at the moment. We're not geared up for people with such complex needs, but because there is a massive shortage of places for them to go.' (TS, A5)

10.51 The consequences for people with complex needs could be an unsustainable tenancy resulting in eviction. Specific issues, namely mental health, were identified as being significant challenges particularly problematic as one third sector service provider noted *'there's not enough supported housing for people under mental health; there is none'* (TS, A2). A third sector service provider in a rural location reflected on a recent situation *'both of them were evicted ultimately because there was no resource to get help for them'*. Where resources did exist, there was a *'huge demand for them'* and as such, these services were seen to be *'just touching the surface of the volume we've got'* (LA, A4).

10.52 Service providers reported that some service users might never be able to live independently, yet no provision exists for those people who will need ongoing housing support: *'So, as much as we're trying to find to push them into independent living, they're never going to cope... we recognise that and we manage it as best we can.'* (TS, A2). Moreover, people with complex issues were also felt to be unsuitable for much of the existing supported housing due to the impact on other residents:

'Supported accommodation is a valuable resource in the county because we haven't got that much of it ... If you don't understand what the project is meant to do and who they're meant to be for, if they're putting somebody in who doesn't fit that profile, it can destabilise everybody else, especially if you're talking about people with mental health problems.' (LA, A4).

Shared accommodation and the under-35s

10.53 For the under-35s, the shared accommodation rate of housing benefit was discussed in the context of affordability, sustainability and the challenges facing service providers working with younger adults:

'I think that's one of the main challenges that's going to be facing us for housing because they'll only be getting the shared accommodation rate. So, we are looking at dealing with that strategically and as a partnership with the common housing register ... It's evolving, you know, the challenges that we face but the main one now is affordability, in sustaining tenancies.' (RSL, A1)

10.54 One third sector service provider considered that there was still work to do to in finding a strategy to work with the under-35s noting that *'we've really, kind of, just got to get to grips with how do we work with a cohort of people who don't potentially have housing benefit attached to them or who have only got shared rating'* (TS, A2). More concerning was the possibility that people in the under-35 category would be *'forced to stay in an abusive family home'* (RSL, A1) if they were not able to access alternative, safe and affordable accommodation.

10.55 In addition, shared accommodation presents a particular problem for single parents in terms of child contact as shared accommodation limits the way in which contact can take place (with no overnight contact for example).

Problems with shared accommodation

10.56 Several service providers also mentioned the problems created by personality clashes and conflict between sharing tenants as *'plonking them together and mixing them up - but you know basically that's a potential recipe for disaster. It might work for some, yes, but it probably won't for the majority'* (RSL, A1).

10.57 One third sector provided a vignette to illuminate the problems of shared accommodation:

'Yes, I mean you can match those similar males with substance misuse or mental health problems, we've got three of them altogether in one house. Nobody would clean the kitchen, nobody would pay the bills, nobody would take responsibility for doing anything.' (LA, A1)

10.58 The problem of who would manage this type of accommodation was seen as problematic for landlords by service providers. The nature of these problems was that shared accommodation was not considered to be a long-term solution, but created unsustainable tenancies and added to the *'revolving door'* cycle.

Alternative solutions for the under-35s: container houses

10.59 Some service providers suggested the use of 'container houses' (affordable homes constructed from shipping containers) as an alternative to shared accommodation:

'We're looking at other solutions. Like we're looking at, well, they're called container houses, which is a horrible term but they are very nice. They're sort of purpose-built houses that we can increase numbers of units that would be suitable for single people under 35. So, we're looking at other initiatives other than shared.' (RSL, A3)

10.60 Other authorities had considered container housing. However, one service providers noted that:

'Our chief executive, he's horrified by the concept of container living. As you say, it might be a temporary solution, but if it's a temporary solution, I think it should be 100 per cent grant funded so that we don't carry the financial burden; because that's the other thing we've got to remember - housing association - it is a business at the end of the day.' (RSL, A1)

10.61 So, whilst container housing was considered to offer some possibilities for increasing future housing stock, it is early days in terms of whether this will offer real chances to construct affordable, accessible housing. In addition, it was not clear that container housing makes good business sense and this raises questions in the context of current austerity measures and limited budgets.

Location and service provision

10.62 Location was an issue in relation to available and affordable housing. As noted above, there is insufficient provision for people with complex needs across Wales and service providers across sectors and case study areas reported that for people with poor mental health in particular there was a stark absence of appropriate accommodation and support. For one service user, the properties that she was being shown were simply too far away for her to consider. She explained:

'One of the properties that was suggested was about a 45-minute commute for me. I earn £14,000 a year, I have to run a car to get to work because of the remoteness of these places. I need to keep my running costs of that vehicle quite low in order to get to work! ... a 45-minute commute every day there and back - it just eats away at what little money you've got to live on.' (SU, A5)

10.63 For other service providers, the rural nature of their local authority created obstacles for people travelling to appointments, particularly if there was limited public transport. Additionally, there were obstacles when accessing other services, for example, doctors or hospitals, and service users had to enter negotiations with Housing Solutions when offered properties which were not in appropriate locations, as the excerpt below illustrates:

'I said to them with this property, where it is, I have a lot of hospital appointments, and some of them I have no choice about where they are because of the departments that you need to see. ... I said to them, 'There are no buses down to this property.' She said, 'You have mobility.' She said, 'Just book a taxi.' What I was trying to explain to her

is the taxis from that property to town are £5. If I've got to get a taxi in the morning it's costing me £5 to get in. If I don't get back, because it's like one of the ones I had to go to in the hospital I knew then I couldn't get a bus back from, because it was an all-day appointment. (SU, A4)

- 10.64 Some authorities spanned very large geographical areas and there were differences in terms of what was available:

'In the south, there isn't much. You've got your supported accommodation for 16 to 25-year-olds, but there isn't any supported accommodation then after that. You've got [X]. You've got [X] but they're for single females, or single-parent females with children, but for single males, single prison-leavers, there isn't supported accommodation in the south. You've got your [X], [X], up there in the north, but there's a huge demand, because [other local authorities] are using them.' (LA, A1)

- 10.65 When considering the geography of North Wales, one third sector service provider noted that:

'North Wales is what I would define as deeply rural. You don't have static services, so if you live in a little village in the mountains, it can take you three buses to get to a city centre. Benefits don't pay your buses, so most people within this area tend to, especially around homelessness, will congregate in the area where there are services.' (TS, A1)

- 10.66 Service providers explained that the demand for housing was connected to a local authority's transport and services infrastructure. Rural authorities were described as having less demand where there were limited public transport and other service provision, and more demand in areas which had a reasonably efficient infrastructure. Whilst the use of the PRS was thought to partially address the housing stock shortage, affordability was problematic in particular areas: in University towns the student population was seen to have driven up rents; rents were also considered to be high in popular seaside towns and cities; and there was a shortage in some desirable rural areas. As a consequence, in those more popular areas, there were additional burdens placed upon homelessness services.
- 10.67 The challenge of delivering services across the geographical landscape of Wales proved difficult for some authorities in terms of being responsive and offering a timely, person-centred service. In addition, where authorities were more rural, access to Housing Solutions was problematic if service users could not travel to offices. Some Housing Solutions teams did not have easy access to space where they could meet with service

users and reductions in funding prevented home visits. In these circumstances, Housing Solutions staff tended to complete assessments via the telephone and never actually met service users, a situation which was not considered ideal by several service providers across sectors:

'There is no face-to-face. Homeless presentations now have to be done over the phone, and I sort of have to say that if you're street homeless what's the likelihood of having a phone?...[or] having enough credit.' (TS, A4)

10.68 As noted by this service provider, there are particular issues with using the telephone to conduct assessments when the service user may have multiple challenges. Furthermore, it was mooted that if someone was experiencing distress or domestic abuse, it is not possible to discern this during a telephone call.

10.69 Overall, service providers reported variability in service provision in terms of availability and delivery across the case study areas. There was a consensus that face-to-face contact with service users was preferred, and that it was more beneficial in terms of completing assessments, developing rapport and being able to offer the person-centred approach advocated within the Act.

Supporting People: moving away from specialisms

10.70 As noted above, there were frequent references to the support needs of people with complex needs and to the absence of specialist accommodation. Associating this with the reduced budget for Supporting People, one service provider framed this within the context of a move to generic, rather than specialist, service provision:

'As the Supporting People budget shrinks and more pressure is on those services and looking at new models and I think probably as a result of the Act as well. To move towards a more generic provision, rather than having those specialist services, we have a larger generic service that's more locality based that can pick up lots of different needs and then could maybe pull on specialisms if needed.' (TS, A5)

10.71 In other authorities, it was considered service providers indicated that the Supporting People budget was used to cover the shortfall. In the words of one third sector service provider:

'All of a sudden now, though it's still non-statutory we're expected to use Supporting People money to fund statutory services because prevention is a statutory service now isn't it, to prevent homelessness is something we have to do by law, but we're using SP

to do it. So in a roundabout way, we're using SP for statutory services when we shouldn't be using SP for statutory services.' (LA, A2)

Lack of Social Housing Provision

10.72 The lack of social housing provision across Wales was widely acknowledged to be a fundamental obstacle to countering homelessness as *'social housing, as everywhere, is under great demand, in short supply'* (TS, A1). Over a third of the service users expressed frustration at the lack of social housing and the barriers to entering the private rental market:

'[T]hey haven't got enough houses to go round. Let's put it that way. That's obvious. Nobody can do anything about that. Well, okay, the government could do a lot about it. Why not do what they done in the 60s/70s and start building?' (SU, A4)

10.73 One service provider voiced their concerns in terms of affordability:

'I know there's a lot more talking about affordability of social housing now and affordability tests being done pre-tenancy, to see if people are able to afford. My worry is, if we don't house people who look as if they can't afford to live in social housing; who on earth are going to house them? That is my issue.' (RSL, A1)

10.74 As such, service users did not feel they had either choice or control, but appreciated what support local authorities provided although it did not always resolve their situation. A considerable proportion had subsequently found accommodation with RSLs and they all reported being happy with their accommodation. This was especially the case where tenancy support was provided on a regular basis:

'It's helped me greatly, to be honest. I feel I was a bit worried when I was first moving out of [hostel] because before I come down here, I have obviously lived with my ex-partner and my children and then I've been in hostels for the last 18 or for the previous 18 months till I moved out, so I'd always been used to having people around and having a bit of support... and so I was quite worried when I first moved out that it wouldn't be there so much anymore but [support worker] has been absolutely brilliant, absolutely brilliant.' (SU, A3)

Summary

10.75 According to the Welsh Homelessness Monitor, almost all Welsh local authorities responding believed that homelessness in their area had been exacerbated by post-2010 Welfare Reform, and Welfare Reform has had a disproportionate effect in several areas of Wales as a result of industrial decline over time (Fitzpatrick et al, 2017).

- 10.76 The introduction of Universal Credit, and Welfare Reform more generally runs counter to the person-centred ethos of the Act (prevention and person-centred). The ability of devolved governments in small countries to implement policy change is limited (Public Policy Institute for Wales, 2017). Welfare Reform, by reducing the level of benefit payments and restricting payments to those under 35 years of age compromises people's ability to pay for private rented accommodation and also acts as a deterrent to private landlords letting properties to people in receipt of benefits.
- 10.77 Just as the causes of homelessness are partly attributed to structural problems (shortage of accommodation; unemployment; poverty) the solutions to homelessness are also structural and therefore outside of the remit of the Act. The fundamental causes of homelessness are not addressed by the Act, and ultimately the Act is limited to managing need and demand (Welsh Audit Office, 2018).
- 10.78 A shortage of accommodation – particularly for single occupancy - across the social and private rented sector compromises local authorities' ability to prevent and relieve homelessness.

11. Conclusion and Recommendations

Introduction

- 11.1 The overwhelming consensus is that the new statutory homelessness framework ushered in by the Act has had an array of positive impacts. It has helped to shift the culture of local authorities towards a more preventative, person-centred and outcome-focused approach, which has meant a much-improved service response to tackling homelessness.
- 11.2 The official statistical returns bear this out, with almost two-thirds of households threatened with homelessness having it prevented and two-fifths of homeless households being relieved of homelessness
- 11.3 As expected, the number of priority need households assisted under the new 'duty to secure accommodation', activated only after prevention and/or relief efforts have failed, is much lower than statutory homeless 'acceptance' levels under the pre-2015 system
- 11.4 However, rough sleeping is rising in Wales and it is universally recognised across local authorities and among service providers that rough sleepers have benefited least from the recent legislative changes. There is growing recognition that something needs to be done.
- 11.5 This final chapter summarises key findings from the evaluation of the Act and presents a series of recommendations based upon these.

Summary of key findings

Impact and processes of the Act

- 11.6 There was unanimous support for the ethos and intent of the Act, from respondents to the local authority survey and among service providers. There is evidence of increased prevention activity and improved outcomes for service users. Similarly, 'reasonable steps' have been strategically embraced by local authorities and this has also resulted in better outcomes for people presenting as homeless/threatened with homelessness. The Act therefore, provides a framework within which it is possible to prevent and relieve homelessness for a wide range of people who would not have been included under the previous arrangements.
- 11.7 However, there is significant variation across Wales and also within local authority areas regarding the extent to which the ethos of the new Act has been adopted and the effectiveness of prevention and reasonable steps: this is a concern.
- 11.8 There is evidence of variation in the interpretation of intentionality and local connection. Intentional homelessness was seen by a minority of service providers as a means of

gatekeeping access to services; however, the majority felt it to be counter to the ethos of the Act and detrimental to achieving positive outcomes.

- 11.9 Successful implementation of the Act is contingent on a number of factors: the skills, expertise and behaviour of staff delivering the service (particularly frontline, first point of contact staff); and also upon structural factors, for example the availability and affordability of housing in a particular area.
- 11.10 Being responsive to local needs and individual circumstances needs to be balanced with ensuring a uniform interpretation of 'reasonable steps', in particular to avoid disadvantaging people with vulnerabilities and complex needs (this is discussed further below).
- 11.11 Of the 90 service user interviewees whose housing situation could be verified during the second wave of fieldwork, 50 had been successfully rehoused (33 in social housing, 17 in the PRS). However, a significant number remained in insecure housing six months after they presented as homeless (21) and nine people were rough sleeping.
- 11.12 Additionally, although 21 out of 22 local authorities confirm that they take steps to maintain contact with service users who miss appointments with Housing Solutions staff, a further concern is the 64 people whose housing circumstances could not be verified. In most instances cases had been closed by local authorities – often cited as 'failure to cooperate – but the reasons for this were not always clear.

Implementation and Administration

- 11.13 Most local authorities reported significant challenges in implementing the Act. Such challenges include an increased administrative burden; more bureaucratic working arrangements; and higher and more complex workloads for Housing Solutions staff. The issue of resources is also considered a significant challenge for the successful future implementation of the Act (discussed below).
- 11.14 The Code of Guidance is considered useful as a reference document (its intended purpose). However, there were some suggestions made regarding how it could be more user-friendly.
- 11.15 Some RSL and third sector service providers indicated that they had not received any training regarding the Act, and there was variation among local authority staff in terms of the timing, quality and amount of training received. The evaluation shows that service users valued being listened to and not judged, therefore, arguably, service providers now need additional skills – e.g. negotiation; empathic practice; and motivational interviewing –

than previously. Staff not being equipped with the requisite skills can negatively impact on the outcomes for service users and compromise the implementation of the Act.

- 11.16 It is apparent that for local authorities completing/submitted statistical returns, it is an onerous process. There are also issues regarding the quality of the data due to variation in recording practices across authorities. Significantly, the data does not always capture the work being undertaken, particularly around prevention.

Person-centred practice and culture change

- 11.17 The shift in culture to outcome focused person-centred practice from process driven assessment is a work in progress across Wales. The adoption of a new organisational culture and approach to tackling homelessness is also variable across Wales (and within authorities) and evidence suggests that there is resistance to change, particularly among staff who worked under the previous arrangements. This impacts on the outcomes for service users and it is clear that continued work is needed to properly embed the person-centred culture of the Act. It is evident that not all local authority staff have fully committed to the ethos of the new Act since gatekeeping and assessment persist in some areas.
- 11.18 Personal Housing Plans appear to be instrumental in promoting person-centred practice, and service providers were overwhelmingly positive about using them, despite the increased paperwork involved. PHPs appear to be instrumental for Housing Solutions Teams in embedding the person-centred ethos of the Act. However, PHPs do not seem to be benefiting service users, who report not finding them particularly useful, so more work is needed to optimise the benefits for service users.
- 11.19 Navigating new systems introduced by the Act poses challenges for some service users, and receiving multiple letters throughout the process can be confusing rather than helpful.

Partnership working

- 11.20 It is evident that there is strategic support for partnership working among local authorities across Wales. There is also evidence that partnership working has increased between and within local authorities, and with RSLs and third sector service providers. However, again, there is much variation within and between local authorities.
- 11.21 There are examples of positive partnership working arrangements with Social Services. However, successful partnership working between homelessness and health and mental health services in particular remains an area where significant improvements could be made.

- 11.22 In general, successful partnership working appears to develop as a result of individual relationships between service providers rather than strategically. There is significant evidence of successful partnership working among third sector organisations, but again this is often contingent upon individual relationships rather than being strategically driven.
- 11.23 Similarly, a legacy of poor relationships between individuals across sectors can perpetuate difficulties in working collaboratively.
- 11.24 Additional obstacles to developing and embedding partnership working include conflicting agendas/priorities. For example, local authority emphasis might be on preventing eviction, while RSLs may prioritise wider neighbourhood/community concerns.
- 11.25 The use of gateways/pathways is generally viewed positively at strategic level, although service providers and service users report challenges in navigating multiple systems.

The Private Rented Sector

- 11.26 Although respondents to the local authority survey and service provider participants in the research accepted the role of the PRS in addressing homelessness, there were significant misgivings about how this operates in practice. Concerns centre on: the lack of available affordable accommodation – one bed properties in particular; insecurity of tenure; the poor condition of some properties; and the unwillingness of some private landlords to rehouse people in receipt of welfare benefits.
- 11.27 The welfare system also impacts on the use of the PRS. There are fears about the future impact of Universal Credit, levels of benefit, and limits to local housing allowance, particularly for people under 35 years of age.
- 11.28 In addition there are obstacles to people accessing the private sector as a result of lettings agency fees and unaffordability for those on low incomes.
- 11.29 Some concerns exist around the experience of private landlords in supporting vulnerable people and their willingness to rehouse people with multiple needs.
- 11.30 Social lettings agencies appear to be positive and useful to forge good relationships with private landlords.
- 11.31 There were mixed views with regard to Rent Smart Wales. It has established a regulatory framework for the PRS, but there is a perception that it may have discouraged some smaller private landlords from renting out properties. Additionally, it has not implemented a minimum standard for accommodation.

Vulnerable Groups

- 11.32 Single people experienced poor outcomes under the previous legislation. It is important to note however, that under the new Act, that the outcomes for single people are still poor as they often remain without a solution after all stages. This can partly be attributed to a lack of affordable appropriate accommodation and the increasing complexity of people's needs.
- 11.33 The number of young people presenting as homeless/threatened with homelessness appears to be increasing, and often their housing needs are also compounded by the co-existence of other issues, e.g. poor mental health and substance misuse.
- 11.34 Restricted financial support for people under 35 years of age is also a potential obstacle to resolving young people's homelessness. Placing people with complex needs in shared accommodation poses additional challenges.
- 11.35 Poor mental health affected the majority of service users who participated in the study. Many people had pre-existing conditions, while others reported a deterioration in their mental health as a result of experiencing homelessness or a precarious housing situation. Significantly, securing accommodation for people with mental health problems was reported as the biggest challenge facing service providers. Clearly this is an issue which requires attention.
- 11.36 It is evident that people with undiagnosed mental health conditions experience challenges in accessing support services. Additionally, those people who are not deemed to meet a threshold by mental health services struggle to access support. People with more severe mental health services also face challenges if there is insufficient support. Housing Solutions teams are not specialist mental health professionals and also need support to effectively assess people's needs.
- 11.37 As indicated above, partnership working between homeless and mental health services is often lacking, which negatively impacts on service user outcomes.
- 11.38 It is clear that previous experiences of the care system can endure and have longer term impacts on people's housing stability.
- 11.39 In addition, challenges remain with regard to service provision for people fleeing Domestic Violence and Abuse; outcomes appear to be contingent upon location, with some local authority areas being more responsive at the first point of contact than others.

- 11.40 The National Prisoner Pathway appears to work much more effectively where a motivated and dynamic Prison Resettlement Officer (sometimes funded through Welsh Government transitional funding) is in place.
- 11.41 Since the introduction of the Act, rough sleeping has increased across Wales. In stark terms, people who are rough sleeping, cannot have their homelessness prevented and often do not meet the vulnerability threshold to be considered as being in priority need. Therefore, they do not receive a rehousing duty at the final stage of the legislation. Additionally, often people have entrenched problems (mental health issues and substance misuse). Again, shortage of suitable accommodation compounds these issues.
- 11.42 There is a lack of robust monitoring across authorities in Wales, and there is evidence of a lack of clarity regarding responsibility for equalities monitoring under the 2010 Equalities Act.

Structural Challenges

- 11.43 There are a number of significant structural challenges which will impact on the successful implementation of the Act.
- 11.44 It is clear that local authorities are preventing homelessness on an individual basis and reacting to homelessness and the problems it causes; however, the structural causes of homelessness remain unaddressed by the Act. Increased demand for services since the introduction of the Act is also challenging, compounded by a lack of available accommodation for people to move people to. This impacts on local authorities' ability to effectively prevent and relieve homelessness.
- 11.45 The work of Welsh Government and local authorities is shaped by social policies established by UK Government, particularly in relation to welfare benefits.
- 11.46 Welfare Reform in particular is problematic and undermines the prevention/person-centred ethos of the Act. In practical terms Welfare Reform will reduce the resources available to low income households in Wales and impact on their ability to afford private sector rents. This is a significant concern, as the successful implementation of the Act is contingent on local authorities' ability to discharge homelessness duties through the PRS.
- 11.47 Additionally, the roll out of Universal Credit is expected to exacerbate challenges to tackling homelessness. Often people do not have the experience or skills to budget/manage money and increases in debt/rent arrears are likely to lead to eviction and increase homelessness.

- 11.48 The complexity of the welfare system is likely to confuse people and also potentially negatively impact on their income levels.
- 11.49 The deficit between benefit payments and rent levels will also impact on affordability in the PRS.
- 11.50 Although local authorities have received extra funding to implement the legislation, and levels of, Supporting People funding has remained relatively stable, the main local authority settlement has reduced. Such reductions to local authority budgets have also resulted in reductions in support services - e.g. tenancy support – which again will negatively impact on levels of homelessness. In addition, the short-term funding for third sector providers poses a further challenge.
- 11.51 The impact of the Bedroom Tax and the lack of single person accommodation also negatively impacts on single people.
- 11.52 The variable geography and demographics of Wales means that there is no uniform picture and each local authority area (rural/coastal/urban) faces different challenges. In particular, delivering face-to-face services in rural areas can be problematic.

12. Recommendations

12.1 The recommendations are presented below in order of priority, with some designated as for immediate action (priority recommendations), others as medium-long term recommendations and the remainder as future considerations.

Priority recommendations

Priority recommendations to optimise the outcomes for service users

- 12.2 Local authorities should conduct holistic assessments, which go beyond housing need to uncover any additional unmet needs.
- 12.3 Personal Housing Plans are useful for staff and have been instrumental in changing the culture in Housing Solutions Teams; however, since they appear to be less useful for service users, more collaboration between Housing Solutions and service users is needed in setting priorities to ensure that the PHP is tailored to the circumstances of each individual. A strategic steer should be provided by Welsh Government in the Code of Guidance and outcomes should be better monitored by local authorities.
- 12.4 Homelessness services need to be physically accessible: face to face contact is the most person centred. Rural authorities should consider providing 'floating' mobile advice surgeries.
- 12.5 Local authorities should streamline communication processes with service users and maintain regular communication with them. There should be requirements in place to maintain contact (within data protection regulations), for example by weekly text as a minimum. Local authorities should monitor this.
- 12.6 There needs to be more flexibility for people with vulnerabilities with regard to the interpretation of reasonable steps – reasonable steps need to be tailored to the individual rather than standardised across all clients; full account needs to be taken of capacity. There needs to be more robust monitoring by local authorities of individual cases, and efforts made to maintain contact with people who present as homeless. There also needs to be closer monitoring around failure to cooperate as so many people fall outside the system.
- 12.7 Welsh Government should continue to develop the Welsh Housing First Approach.. As this develops, mental health, substance misuse services and the Police should be involved as key strategic partners

Priority recommendations to optimise the successful implementation of the Act

- 12.8 Since progress in implementing the Act is variable across Wales, sharing and embedding good practice across local authorities is needed. This should be done via the Homelessness Network³⁶ and included as a regular agenda item. Local authorities should consider establishing cross-local authority visits/shadowing/peer exchange to learn about how different problems are dealt with in different areas
- 12.9 The Welsh Government could make the Code of Guidance more accessible and user-friendly by indicating where amendments have been made (for example, through listing amendments in an annex), and including hyperlinks in the pdf document for ease of navigation. At the next redraft, for greater clarity, the Welsh Government should produce a 'Best Practice Guide' including scenarios as a separate document from the Code of Guidance.

Priority recommendations to improve partnership working

- 12.10 There needs to be a clear understanding of the nature and remit of partnerships across authorities in order to optimise the use of resources, avoid duplication of services and achieve the best outcomes for service users. Welsh Government should ensure that organisations they fund are working appropriately with local authorities. Local authorities should consider establishing service level agreements with their partners and set out clear standards regarding partnership working. Contracts should also be closely monitored by local authorities. Local authorities should introduce information sharing protocols between health and housing services, and between Housing Benefit and Housing Solutions, drawing on established service level agreements.
- 12.11 Local authorities should work with RSLs to prevent evictions and increase tenancy sustainability, for example, by conducting joint interviews before court hearings. It would be useful if RSLs could profile tenants at risk of eviction to establish support. Support packages should be flexible and recognise that some service users need long-term, not time-bound support. Supporting People services should not automatically end when homelessness is addressed.

³⁶ The Homelessness Network is now managed by Newport City Council on behalf of the 21 other local authorities in Wales

Priority recommendations for developing local authority services

- 12.12 The information available for service users should be improved. It needs to be up to date and in an accessible format. Local authorities should update information on websites as a priority. This information should be monitored by local authorities and reviewed by the Homelessness Network. The bureaucracy working group should be re-established to explore communication processes.
- 12.13 All local authorities should appoint a Prison Resettlement Officer and ensure that the person appointed to the role has the requisite skills and support and receives appropriate training.
- 12.14 There is a need for more and ongoing training for staff, not just focusing on the technical detail/provisions of the Act but on its ethos and impacts on practice. The skill set required to successfully implement the Act - motivational interviewing; customer service; empathy; mediation; problem solving; liaison; person-centred practice; counselling; mental health awareness - also needs to form the basis of training. Training also needs to be rolled out to non-statutory partners. The Welsh Government should work with the Homelessness Network and local authorities to evaluate how training needs could best be met.
- 12.15 Mentoring for staff in housing teams should also be considered by local authorities. This should be available to all staff, including those with a number of years of experience so that staff at all levels receive ongoing support and are able to develop. Appropriate line management support – and clinical support where appropriate - should also be available to ensure the well-being of frontline staff.
- 12.16 In order to mitigate the impacts of Welfare Reform, local authorities need to be more aware of the impacts of Universal Credit and how to manage delays in the system. Learning from authorities who have implemented Universal Credit should be shared via the Homelessness Network. Local authorities should use discretionary housing payments to facilitate homelessness prevention.
- 12.17 Budgeting and money management should form part of new tenant training. Service users should be signposted to employability and skills training as part of the implementation of reasonable steps. Each local authority should appoint a Welfare Reform Officer to focus on increasing income and reducing expenditure for service users.
- 12.18 The use of private rented sector officers and social lettings agencies should be rolled out across authorities and a standardised approach should be adopted by local authorities. This could be developed through the Homelessness Network.

Priority recommendations to optimise the role of the Private Rented Sector and provide support for private sector tenants

- 12.19 The Welsh Government should explore how they can support private landlords and private sector tenancies to ensure consistency of services with RSL provision.
- 12.20 Local authorities should continue to work with private landlords to provide support (financial) and increase tenancy management support, particularly for tenants with vulnerabilities. More incentives should be in place for private landlords, including paying for repairs/rent arrears and using LA contractors to conduct repairs
- 12.21 Local authorities should provide more support for private landlords regarding tenants claiming Universal Credit Local authorities should consider establishing a Landlord Support Service in their area to ensure that they stay in the sector

Priority recommendations for changes in monitoring

- 12.22 Keeping full records of reviews and appeals would help to provide a more accurate picture of local authority and service-user interpretations of the legislation and any differences between the two. It would also allow more accurate monitoring in general and help the Welsh Government to identify areas where more guidance is needed.
- 12.23 IT infrastructures should support monitoring and tracking of individual cases. This should involve changing current data collection methods so that individual record data is collected (rather than aggregate tables). Along with helping local authorities better track individual cases, this would also allow for deeper analysis of the statistical data by researchers to better understand the situation of homeless households/those threatened with homelessness in Wales over time. Further guidance is needed on this from the Welsh Government.
- 12.24 Improved equalities monitoring by local authorities is required, with evidence needed of how such monitoring informs future practice. This should be reiterated and clarified further in the Code of Guidance by the Welsh Government.

Priority recommendations to address structural challenges

- 12.25 In order to meet homelessness strategies, local authorities should work with RSLs to increase the availability of appropriate accommodation through using Social Housing Grant funds. A suite of options should be considered – addressing the need for one and two bedroom properties to satisfy demand. This should be informed by an evidence base in each local authority area.

Medium-long term recommendations

Medium-long term recommendations for legislative changes

- 12.26 The Welsh Government has taken the first step of removing intentionality as households with children will be given 'a second chance' from 2019. Welsh Government should give all priority need households 'a second chance' and work towards removing intentionality for all households deemed to be in priority need.
- 12.27 Non-priority need homeless people should be accommodated in temporary accommodation for a period of up to 21 days to prevent rough sleeping. The Welsh Government should provide discretionary funds to local authorities to facilitate this. The Welsh Government should explore including rough sleeping as a priority need category.
- 12.28 There is a need for further research around local connection with a view to establishing a national reconnection service across in Wales. This could be jointly commissioned by the Welsh Government and the Welsh Government Local Government Association. All 22 local authorities in Wales would need to sign up to the national reconnection service and outcomes would need to be carefully monitored by the Welsh Local Government Association.
- 12.29 In line with Scotland's Private Residential Tenancies Act (effective from January 2018), the Welsh Government should consider the introduction of rent caps in areas where rents are increasing rapidly.
- 12.30 Since 'vulnerability' is a highly subjective assessment, the Welsh Government should review the Code of Guidance with a view to establishing greater consistency and clarity, particularly with regard to age and mental health. There should be additional training for Housing Solutions staff regarding 'the other special reason' (vulnerability category) definition of priority need to ensure that people's needs are fully assessed and captured.

Medium-long term recommendations to optimise the outcomes for service users

- 12.31 In order to promote tenancy sustainability local authorities should work towards aligning homelessness and Supporting People services. Local authorities commission Supporting People services to work with Housing Solutions teams to promote tenancy sustainability and early support for service users. Support packages should include tenancy management, money advice, and employment and training advice and these should be regularly reviewed.

Medium-long term recommendations to optimise the successful implementation of the Act

- 12.32 Although significant financial investment has already been made, the Welsh Government needs to continue to provide funding to support local authorities post 2019/20. Funding will be needed to cover staff costs; skills training; and prevention. The Welsh Government should monitor homelessness levels and make adjustments to align resources to where the number of homeless presentations and rough sleeping has increased.
- 12.33 The Welsh Government should commission further research in order to understand how the use of gateways and the Homelessness Prevention Grant are influencing prevention, and best practice should be shared via a 'Best Practice Guide' as described above. The Homelessness Network should work with local authorities to take ownership of producing the Best Practice Guide.
- 12.34 The Hospital Discharge Protocol for Homelessness People³⁷ should be examined and its use reinvigorated to ensure that local authority housing teams are given sufficient notice to put arrangements in place for homeless people leaving hospital. Local authorities should consider establishing regional link workers to operate between hospitals and Housing Solutions Teams.

Medium-long term recommendations to improve partnership working

- 12.35 Better strategic alignment of agendas (homelessness/mental health/social services and well-being/RSL practice) is needed from the Welsh Government with the development of shared indicators capturing performance. Joint training regarding the underlying reasons of complex cases across local authorities, RSLs, third sector organisations and Shelter would be useful. Psychologically Informed Environment (PIE) training³⁸ would be appropriate to embed this. Strategic direction from Welsh Government is needed to ensure better engagement between housing services and mental health services. The Minister for Housing and Regeneration and the Cabinet Secretary for Health and Social Services should take joint responsibility for the rough sleeper strategy.
- 12.36 Evidence suggests that Supporting People services are more prevention focused when located in housing departments rather than social services. Local authorities should strengthen the commissioning and monitoring of Supporting People funding.

³⁷ Published by the Welsh Government and Public Health Wales in 2014.

³⁸ Funded by the Welsh Government and delivered by Cymorth, Psychologically Informed Environment training and aims to support the prevention of homelessness through trauma-informed approaches to meeting people's housing and support needs.

Medium-long term recommendations for developing local authority services

- 12.37 Local authorities should publish service standards detailing what service users can expect and these should be co-produced with service users, monitored by local authorities and audited by the Homelessness Network. Service standards should be written in user friendly language and an indication of timescales should be provided.
- 12.38 Appointing a mental health practitioner to work alongside Housing Solutions Teams would improve outcomes for people with mental health issues: this could operate in a similar way to the Prison Resettlement Officer. Housing needs assessments should include mental health assessments where appropriate to ensure that people receive support for mental health issues.
- 12.39 Local authorities should embed other services in Housing Solutions teams. For example, specialist mental health, debt advice and drug and alcohol co-ordinators should be included in Housing Solutions Teams/across authorities. The Welsh Government should also facilitate different services sharing their experiences of addressing homelessness and complex cases through funding PIEs training. Local authorities should take responsibility for staff attendance at such training to make sure that they are appropriately trained.
- 12.40 The first point of contact with services (i.e. frontline staff) is important. Local authorities could audit this by the use of 'mystery shoppers' and result in measures being put in place to support Housing Solutions staff. This could be facilitated by the Homelessness Network.
- 12.41 The Welsh Government should consider funding a bond scheme in each local authority area.

Medium-long term recommendations to optimise the role of the Private Rented Sector and provide support for private sector tenants

- 12.42 Local authorities should work with the PRS to explore whether longer tenancies (minimum of 12 months) would work for them in order to increase security of tenure for individuals.
- 12.43 The Welsh Government should explore the use of Section 21 notices with regard to the impact on tenants and housing supply for homeless households.

Medium-long term recommendations for changes in monitoring

- 12.44 In order to address current flaws in monitoring processes, greater standardisation among local authorities is necessary. The Welsh Government should review the existing guidance and provide more clarity regarding a standard approach to data collection

among local authorities that captures the full range of activity in each local authority area, including from partner agencies as far as possible.

Future considerations

- 12.45 The Welsh Government should establish a regulatory body to monitor performance and partnership working across sectors and authorities.

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Annex 1 Local Authority Survey – Wave 2

LA Survey Wave 2: Post-Implementation Evaluation of the Homelessness Part of the Housing (Wales) Act 2014

Introduction

Welcome to the follow up Local Authority Survey on the Post-Implementation Evaluation of the Homelessness Part of the Housing (Wales) Act 2014. We appreciate you taking the time to undertake the survey.

Similarly to last year, the survey is comprehensive, covering a number of areas of the legislation. However, the final question will allow you to make any comments that you feel are pertinent to the evaluation, that the survey has not been able to capture.

You may notice that some of the questions are the same or similar to those from last year. This is to ensure that we have the latest information from your Local Authority and can examine any changes that there might have been over the last year (since July/August 2016).

Any questions that you have about the survey can be addressed to m.a.wilding@salford.ac.uk

Thank you in advance for your participation.

1. Please complete the following information:

Name of Local Authority:	
Your role:	
Name:	
Contact Info (we will only contact you if clarification is required):	

Please answer the following questions in detail, and give reasons for your answers.

For questions that refer to the last year, this is the time since you last completed the survey in July/August 2016.

Regarding implementation of the Act

We are now going to ask you about the implementation of the Act in your Local Authority.

2. In the last year (since July/August 2016), has there been a change in how your Local Authority uses the 'Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness'?

Yes

No

2a. If yes, please explain?

3. How confident are you that you are fully compliant with the Act?

Very confident

Quite confident

Neither confident nor unconfident

Not very confident

Not confident at all

3a. Please explain your answer:

4. What would you say were the top 3 challenges your Local Authority faced in implementing Part 2 of the Act in the last year? *Please choose from the list below.*

Please don't select more than 1 answer(s) per row. Please select between 1 and 3 answers.

Please don't select more than 1 answer(s) in any single column.

	1	2	3
Administrative burden			
Availability of support services			
Customers' understanding of the Act			
Developing relationships with the private rented sector			
Financial resources			
Increase in case numbers			
Lack of affordable/suitable private rented sector accommodation			
Lack of affordable/suitable social housing			
Monitoring & data collection			
Partners' understanding of the Act			
Prisoner Pathway			
Restructuring/New ways of working			
Training			
Staffs' understanding of the Act			
Upgrading IT systems			
Welfare reform			
Other 1 (please specify below)			
Other 2 (please specify below)			
Other 3 (please specify below)			

Resources

We are now going to ask you about how changes associated with the Act have impacted upon resources in your Local Authority.

5. What has the impact of the Act been on demand for homelessness services in your Local Authority in the last year?

Substantial increase

Slight increase

No change

Slight reduction

Substantial reduction

5a. Please explain your answer:

6. How have you met this demand? Tick all that apply

Changes to IT systems

Closer relationships with the private rented sector

Closer relationships with other external partners

Closer relationships with Supporting People services

Closer relationships with other internal partners

Redeploying staff to customer facing roles

Remodelling of services

Staff training

Transitional funding

Other 1 (please specify below)

Other 2 (please specify below)

Other 3 (please specify below)

Duties under the Part 2 of the Act

We are now going to ask you about the information, advice and assistance in accessing help that your Local Authority provides.

Information & assessment

7. In the last year, has there been any change in the channels that your Local Authority uses to provide information, advice and assistance regarding accessing help for people who are homeless/at risk of becoming homeless under s60 of the Act?

Please don't select more than 1 answer(s) per row. Please select at least 1 answer(s).

	Substantial increase	Slight increase	No change	Slight reduction	Substantial reduction
Face-to-face					
Telephone					
Web-based					
Email					
SMS text message					
Teleconference/video link					
Other 1 (please specify below)					
Other 2 (please specify below)					
Other 3 (please specify below)					

8. In the last year, has your information and advice service changed to address the needs of the particular groups under s60(4) of the Act? In particular:

Yes **No** Please add any additional information in relation to question 8 here:

People leaving prison or youth detention accommodation:

Young people leaving care:

People leaving the regular armed forces of the Crown:

People leaving hospital after medical treatment for mental disorder as an inpatient:

People receiving mental health services in the community:

9. In the last year, has the information and advice service changed to address the needs of:

Yes **No** Please add any additional information in relation to question 9 here:

Single people

Rough sleepers

People with 'protected characteristics'

People from other local authorities/cross border

People receiving mental health services in the community

10. In the last year in your Local Authority, has there been a change in the process (at the point first contact is made by people who are homeless/at risk of becoming homeless) when you decide whether a homelessness assessment is applicable under s62 of the Act.

Yes

No

10a. If yes, please explain:

11. In the last year, has there been a change in how your Local Authority uses personal housing plans?

Yes

No

11a. If yes, please explain:

Prevention

We are now going to ask you about the work that your Local Authority does to help prevent an applicant from becoming homeless.

12. For each of the services listed below, to help prevent an applicant from becoming homeless under s66 of the Act, please indicate whether this is via Local Authority provision or non-Local Authority provision. Please also indicate whether the provision of this service has increased since the Act: Tick all that apply

	Local Authority Provision	Non-Local Authority Provision	Increase in provision in the last year
Outreach			
Mediation			
Payments by way of grant or loan			
Guarantees that payments will be made			
Support in managing debt, mortgage arrears or rent arrears			
Security measures for applicants at risk of abuse			
Advocacy or other representation			
Other forms of tenancy support			
Accommodation			
Programmes to increase availability of affordable accommodation			
Social housing lettings schemes			
Information and advice			
Negotiation with private/social landlords			
Other services, goods or facilities (please specify below)			
Other services, goods or facilities (please specify below)			
Other services, goods or facilities (please specify below)			

13. Has there been a change in the last year in the level of resources that your local authority has available to offer the services discussed in question 12?

Substantial increase

Slight increase

No change

Slight reduction

Substantial reduction

Other

13a. Please explain your answer:

14. Has there been a change in the last year in how you allocate resources in order to offer the services discussed in question 12?

Yes

No

14a. If yes, how?

15. Have there been any significant problems in the last year due to limited resources in the services discussed in question 12?

Yes

No

15a. If yes, please explain your answer and what steps you are taking to resolve these:

16. Has there been a change during the last year in how your Local Authority responds to people who are at risk of homelessness in more than 56 days?

Yes

No

16a. If yes, please explain:

17. Why, in your experience, does so much successful prevention activity result in sourcing alternative accommodation? For example, what barriers are there to helping to prevent the loss of the original accommodation?

Priority need

We are now going to ask you about Priority Need in your Local Authority.

18. Has your Local Authority changed its application of the vulnerability test under s71 in the last year?

Yes

No

18a. If yes, how?

19. Has your Local Authority changed its approach to those leaving prison and/or youth custody in the last year?

Yes

No

19a. If yes, how?

Help to secure accommodation

We are now going to ask about how you help to secure accommodation for homeless applicants in your Local Authority (i.e. the relief stage).

20. For each of the services listed below, to help secure accommodation for homeless applicants under s73 of the Act, please indicate whether they are provided via Local Authority or via non-Local Authority provision. Please also indicate whether the provision of this service has increased since the Act: Tick all that apply

	Local Authority Provision	Non-Local Authority Provision	Increase in provision in the last year
Outreach			
Mediation			
Payments by way of grant or loan			
Guarantees that payments will be made			
Support in managing debt, mortgage arrears or rent arrears			
Security measures for applicants at risk of abuse			
Advocacy or other representation			
Other forms of tenancy support			
Accommodation			
Programmes to increase availability of affordable accommodation			
Social housing lettings schemes			
Information and advice			
Negotiation with private/social landlords			
Other services, goods or facilities (please specify below)			
Other services, goods or facilities (please specify below)			
Other services, goods or facilities (please specify below)			

21. Has there been a change in the last year in the level of resources that your local authority has available for the services discussed in question 20?

Substantial increase

Slight increase

No change

Slight reduction

Substantial reduction

21a. Please explain:

22. In the last year, have there been any significant problems due to limited resources in the services discussed in question 20?

Yes

No

22a. Please explain your answer:

23. To what extent has there been a change in the use of the private rented sector in your Local Authority in the last year?

Substantial increase

Slight increase

No change

Slight reduction

Substantial reduction

23a. Please explain your answer:

24. To what extent do you feel there has there been a change in the use of hostels in your Local Authority in the last year?

Substantial increase

Slight increase

No change

Slight reduction

Substantial reduction

24a. Please explain your answer with reference to any changes in need, or changes in types of accommodation and length required:

25. To what extent do you feel there has there been a change in the use of temporary accommodation (other than hostels) in your Local Authority in the last year?

Substantial increase

Slight increase

No change

Slight reduction

Substantial reduction

25a. Please explain your answer with reference to any changes in need, or changes in types of accommodation and length required:

26. Has there been any change in the experiences of your Local Authority in the last year in relation to securing accommodation for:

Yes No Please explain

Single people

Rough sleepers

People with mental health issues

People with 'protected characteristics' (other than mental health)

People from other local authorities/cross border

Other 1 (please specify below)

Other 2 (please specify below)

Other 3 (please specify below)

Duty to Secure

We are now going to ask you about the Duty to Secure in your Local Authority.

27. Has there been a change in the last year in how your Local Authority has fulfilled its duty to secure accommodation for applicants in priority need (s75) when the duty in s73 ends?

Substantial	Slight	No	Slight	Substantial	Please explain
increase	increase	change	reduction	reduction	

Use of private rented sector

Use of social housing

Use of supported housing

Other (please specify below)

28. Does your Local Authority take steps to maintain contact with households who miss an appointment or who fail to follow up with requested information?

Yes

No

28a. Please explain:

29. Please outline the process of how your Local Authority determines that a household has refused to co-operate:

Intentionality

We are now going to ask you about regard to intentionality in your Local Authority.

30. Has your Local Authority disregarded intentionality for any of the purposes of s75 for any specific priority need groups?

Yes

No

30a. If yes, which categories and what impact has this had?

31. Have you made any changes to your original position on intentionality since July 2015?

Yes

No

31a. Please explain your answer:

Local connection

We are now going to ask you about local connection in your Local Authority.

32. How, do you think the absence of a local connection test in s66 and s73 (subject to s73 (2)) of the Act affected demand for homelessness assistance in your area?

Substantial increase in demand

Slight increase in demand

No change in demand

Slight reduction in demand

Substantial reduction in demand

33. Has there been a change in the last year in your Local Authority’s process for providing support for people seeking assistance without local connection in your Local Authority area?

Yes

No

33a. Please explain:

Reviews and appeals

We are now going to ask you about reviews and appeals in your Local Authority

34. How many reviews and appeals have been requested of your Local Authority decisions in the last year?

	Appeals	Reviews
--	---------	---------

Number of successful:

Number of unsuccessful

Total Number:

35. Has the number of requests for your Local Authority decisions to be reviewed/appealed increased or decreased in the last year?

Increased

Decreased

35a. Please explain your answer:

36. Has there been an increase or decrease in the number of successful reviews and appeals of your Local Authority decisions in the last year?

Increase

Decrease

36a. Please explain your answer:

Partnership Work and Government Agendas

We are now going to ask you about your Local Authority's work on partnerships and government agendas.

37. In the last year have there been any changes in partnership working:

For example, more partnerships with the private sector; organisations which support people with mental health needs, young people/ care leavers, and veterans.

37a. Within your Local Authority

Substantial increase	Slight increase	No change	Slight reduction	Substantial reduction	Please explain
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Children's social services

Adults' social services

Environmental health

Tenancy support

Other 1 (please specify below)

Other 2 (please specify below)

Other 3 (please specify below)

37b. With external partners

Substantial increase	Slight increase	No change	Slight reduction	Substantial reduction	Please explain
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Hospitals

Prisons/Youth Detention Centres

Private rented sector

Registered social landlords

Other local authorities

Other 1 (please specify below)

Other 2 (please specify below)

Other 3 (please specify below)

38. In the last year have you introduced:

			No, my Local Authority does not have one, but is planning on introducing one within the next 2 years	If yes, how does this work in practice?
	No, my Local Authority already had one	No, my Local Authority does not have one		
Yes				

- A gateway scheme for Supporting People services
- A formal referral process for Supporting People services

39. How are Supporting People resources targeted to support homelessness prevention? Tick all that apply

Yes No Please add any additional information in relation to question 39 here:

- Co-location of homelessness/SP services
- Direct pathways to the homelessness
- Floating support
- Fully integrated service
- Generic support service

40. Does the homelessness agenda inform the commissioning of Supporting People services?

- Yes
- No

40a. If yes, how? Tick all that apply

Joint commissioning of services

Joint forums held to inform decisions

Reduction in spending of other SP areas

Other 1 (please specify below)

Other 2 (please specify below)

Other 3 (please specify below)

Measuring Outcomes

We are now going to ask you about how outcomes are measured in your Local Authority.

41. Has there been a change in the last year in how your Local Authority monitors the impact of the Act on service users (including single people, rough sleepers, people with 'protected characteristics', and people from other local authorities/cross border)?

Yes

No

41a. If yes, please explain:

42. In the last year, has there been a change in how your Local Authority uses the equalities monitoring data?

Yes

No

42a. If yes, please explain:

43. Are arrangements in place in your Local Authority to measure outcomes for people receiving help under Part 2 of the Act?

Yes

No

43a. If yes, please explain:

44. In the last year, has there been a change in how you use this outcomes data?

Yes

No

44a. If yes, please explain:

45. In the last year, has there been a change in how you analyse this outcome data?

Yes

No

45a. If yes, please explain:

Statement Ratings

46. Please rate how strongly you agree or disagree with the following statements.

	Strongly agree.	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Your Local Authority has not faced any significant challenges in implementing the Act from April 2015.					
There has been an increase in resources available within your Local Authority for preventing and tackling homelessness, aside from Welsh Government transitional funding.					
There has been a decrease in resources available within your Local Authority for preventing and tackling homelessness, aside from Welsh Government transitional funding.					
The Act has influenced your Local Authority to offer improved information, advice and assistance relating to homelessness.					
Your Local Authority is undertaking more preventative work.					
The preventative work is more inclusive.					
The preventative work is more effective.					
Increasing the period that applicants are considered to be threatened with homelessness to 56 days has had a positive impact on homelessness prevention					
Changing the intentionality test from a duty to a power has enabled more effective support to be offered to homeless people and those at risk of becoming homeless.					
The changes regarding local connection have required more effective support to be offered to homeless people and those at risk of becoming homeless who have no local connection.					
The Act has resulted in a stronger emphasis on cooperation between various Local Authority services and multi-agency working.					
The Act has enabled more effective use of the private rented sector to prevent/relieve homelessness					

	Strongly agree.	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The Act has enabled more effective use of the private rented sector to discharge homelessness duties.					
The Act has enabled more effective cooperation with Registered Social Landlords.					
Your Local Authority has processes in place to follow up withdrawn applications under Part 2 of the Act.					
Your Local Authority undertakes more equalities monitoring					
The equalities monitoring is more effective					
Your Local Authority uses equalities monitoring to inform its activities under Part 2 of the Act					
The Act has enabled a culture shift to a more person-centered approach.					
There are clear pathways in your Local Authority for homeless people with support needs to access housing support.					
Overall, the Act is having a positive effect in your Local Housing Authority for people in need of homelessness assistance.					

47. For any additional comments you would like to make about the impact of Part 2 of the Act in your Local Authority, please write in below:

We very much appreciate you taking the time to complete this survey and contribute to the Evaluation of the Homelessness Legislation

Annex 2 Interview schedule for heads of service

1. Tell us about your role in implementing the prevention orientated approach? Has it changed? How?
2. What implications has Part 2 of the Act had for your authority/organisation?
3. What are the key prevention activities in your authority? What works well/could work better?
4. How has the legislation made support person-centred in your authority? (probe for impacts of culture shift on staff/resources and how the culture within the team has changed, including reference to staff turnover.)
5. What impact has the legislation had on services provided to people who present as homeless in your authority who have no local connection? How do you interpret local connection?
6. What is your experience of partnership working under the Act? In particular:
 - * Has partnership working increased/decreased? And with who (other LAs, RSLs, Third Sector etc.)?
 - * Can you give any examples of good practice in your authority?
7. How is this legislation impacting on other agendas in your authority? (e.g. health, environmental health, social care and DVA agendas)?
8. How effectively are Supporting People services enabling the implementation of Part 2 of the Act in your authority?
9. How clear do you think the pathways for homeless people with support needs are in your authority? Could these be improved? How?
10. What impact has Part 2 of the Act had on those in priority need and those not in priority need in your authority?
11. What impact has Part 2 of the Act had on those with protected characteristics in your authority? (prompt: people receiving mental health services in the community) How do you ensure you comply with your duties under the Equalities Act 2010 in the context of the homelessness legislation?
12. Can you identify any training needs associated with implementation?
13. How can resources be most effectively used to help implementation of Part 2?
14. How useful do you think the 'Welsh Government Code of Guidance to local authorities on the allocation of accommodation and homelessness' (2015 and 2016) has been in facilitating effective implementation? Do you have any comments on how it could be strengthened?
15. Have you made any changes to the way that you keep records following the Act? If so, what changes have you made? Why? What have the effects been?
16. What are your views on the data required for the statistical return on homelessness to the Welsh Government? Do you find the statistics useful for benchmarking purposes? To what extent

does the data capture the work that you do? Has collecting this data had any impact on your resources? If so, what?

17. What do you think are the strengths of the Act?

18. Do you have any concerns regarding the Act?

20. Have there been any unintended/unanticipated consequences arising from implementation of Part 2?

21. What further actions could be taken by Welsh Government to support implementation of Part 2?

22. How do you ensure that those being supported by partners are offered support under Part 2 of the Housing (Wales) Act 2014?

24. What steps are you taking to both limit the bureaucratic burden on your staff as well as increase the understanding of paperwork within the client group?

25. What publicity arrangements took place prior to and post implementation with:

- * Third sector partners

- * Housing Associations

- * Service Users

- * General Public

- * Other partners (health, social services, etc)

26. Is there anything else you think we need to know?

Annex 3 Focus group questions for local authority frontline staff

1. What are the key homelessness prevention activities in your authority? (what works well/what could be better)
2. Can you tell us about how support is now 'person-centred'? How has the culture of your organisation changed? What has this meant for your role? (probe for length of time in role/pre and post act)
3. Has partnership working changed since the Act? (probe for increased/decreased and examples of good practice –probe SP/RSL/third sector partnership working and also experiences of RSLs/PRS in practice)
4. Are there any challenges for you/your role/your organisation?
5. Can you identify any outstanding training needs associated with implementation?
6. What provisions are there for young people/single people/people with protected characteristics? (probe for availability and use of temporary accommodation and for people with mental health issues)
7. Can you tell us how doubling the period that applicants are considered to be threatened with homelessness is working in practice in your authority?
8. How does your authority interpret/implement 'the reasonable steps' required to be taken to prevent and relieve homelessness?
9. How does your authority use: intentionality; priority need; local connection?
10. How do you apply the legislation in the context of rough sleepers, and what impact has this had?
11. How useful do you find the 'Welsh Government Code of Guidance to local authorities on the allocation of accommodation and homelessness' (2016)?
12. Overall – what are your views of the implications of Part 2 of the Housing Act (Wales) 2014 in your authority (probe for strengths/ weaknesses/ issues surrounding implementation etc)
13. Is there anything else you think we need to know?

Annex 4 Focus group questions for RSL/Third Sector frontline staff

1. What is your role in relation to homelessness? *(probe for length of time in role/pre and post act)?*
2. What are the key prevention activities in your area of operation? *(what works well/what could be better)?*
3. Can you tell us about how support is now 'person-centred'? How has the culture of your organisation changed in response? What has this meant for your role?
4. Has partnership working changed since the Act and if so how? *(probe for increased/decreased and examples of good practice –probe SP/LA/other third sector partnership working)?*
5. Do you have structured referral processes in place to ensure people are assisted under Part 2 of the Housing (Wales) Act 2014 where they are threatened with homelessness within 56 days or are homeless, even while you continue to support them?
6. How do you work with the local authority to ensure that where a person is threatened with eviction, either in your own housing or where you are helping them with their landlord, exhaustive steps are taken to prevent them becoming homeless?
7. Are there any challenges for you/your role/your organisation in supporting implementation of the legislation?
8. Can you identify any outstanding training needs associated with implementation?
9. What provisions are there for young people/single people/people with protected characteristics? *(probe for availability and use of temporary accommodation and for people with mental health issues)?*
10. Overall – what are your views of the implications of Part 2 of the Housing Act (Wales) 2014 in your authority (probe for strengths/ weaknesses/ issues surrounding implementation etc.)?
11. Is there anything else you think we need to know?

Annex 5 Service user interview schedule (Wave 2)

(brief recap of the previous interview)

1. Can you tell me about what's happened in the last 5/6 months in terms of your living situation?
 - Has it changed? For better or worse? If changed, who secured it? Is it temp or perm etc; how secure is the accommodation
 - Prompt for whether applying for housing in an area where they have a local connection
2. What is your situation now? Is there anything you would like to change?
3. Did you apply for rehousing in an area where you have a local connection?
4. What help have you received from the council?
 - Did you understand the documents you received from the council (PHP/discharge letters)
 - How do you feel that your situation has been dealt with by the council? What have you found the most helpful/least helpful?
 - What was the attitude of the local authority staff?
 - Looking back over the last few months do you think there are any gaps in services?
5. Did you have a personal housing plan?
 - If yes, were you involved in developing it? How useful was it in helping you to find housing?
 - What did you need to do as part of the plan?
 - Were you able to do this? If not why not?
6. What do you think the impact has been of the support you have received? (from homelessness services) What would have happened if you hadn't received this support?
7. Have you accessed any support services (apart from housing)? Do you think you need to? Which type etc.
 - Do you have any other needs (beyond accommodation)? Have these been addressed? Has the local authority helped you to access any support? If so - can you tell us about how this worked?
8. When we last spoke, you talked about hoping for xxxx to happen in the next 6 months – so this has/hasn't happened? How/why not?
9. What are your experiences/views of the private rented sector in your area?

10. What are your experiences/views of housing associations in your area?
11. What are your experiences/views of local authorities in your area?
12. Did the authority stop providing support claiming that you 'unreasonably failed to co-operate'?
If so,
 - a. What do you understand of the term unreasonably failing to co-operate?
 - b. How was it communicated if at all?
 - c. Was it used as a threat first?
 - d. Did you receive a written (or text) warning beforehand?
 - e. What were the grounds for discharge?
13. If an ex-offender, has this had an effect on finding / getting into housing?
14. Do you have anything else you'd like to add about your experience with the housing service?
15. Also need to establish family composition etc (complete demographic information sheet)

Annex 6 Service Provider consultation across case study areas

Case Study Site A1

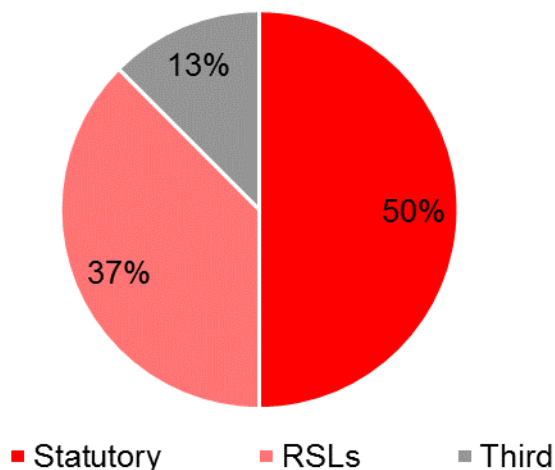
13.1 A total of 16 people were consulted: eight representing the statutory sector; six representing registered social landlords; and two from third sector providers. One head of service, six people occupying management positions and nine frontline staff members were included.

Table 9: Service Providers Interviewed in A1

Statutory sector	Interview: Housing Options Officer Interview: Housing Options (benefit support) officer Interview: Hostel warden Interview: Tenancy Support Officer Interview: Tenancy Support Officer Joint interview (two participants): Homelessness Officers Interview: Supporting People Lead
RSL	Joint interview (two participants): Supported Housing Manager and Hostel Manager (RSL 1) Interview: Services Manager (RSL 2) Focus group (three participants): Manager & Housing Officers
Third sector	Interview: Advice/Casework Manager Interview: Manager (domestic abuse agency)

Figure 37: Breakdown of participants by sector A1

Breakdown of participants by sector A1



Case Study Site A2

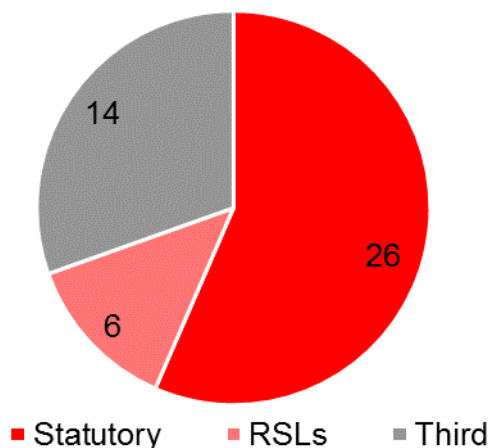
13.2 A total of 46 people were consulted: 26 representing the statutory sector; six representing registered social landlords; and 14 from third sector providers. Two Heads of service were consulted, seven people occupying management positions and 37 frontline staff members.

Table 10: Service providers interviewed in A2

Statutory sector	Interview: Supporting People Lead Interview: Hostels, temporary accommodation units & Rough Sleeping Outreach Services - Manager Interview: Housing Services Manager Interview: Head of Housing Interview: Housing Options Manager Focus Group (14 participants): Housing Options & Homelessness Services Focus Group (seven participants): hostel and homelessness frontline staff
RSL	Interview: Housing/Homelessness Officer Interview: Temporary Accommodation Manager Focus Group (four participants): hostel staff
Third sector	Interview: Public Affairs and Research Manager Interview: Advice Caseworker Focus Group (five participants): TA and hostel – frontline staff (Agency 1) Joint interview (two participants): TA and hostel – managers (agency 1) Focus group (three participants): hostel staff (agency 2) Focus group (two participants) hostel staff (agency 3)

Figure 38: Breakdown of participants by sector A2

Breakdown of participants by sector A2



Case Study Site A3

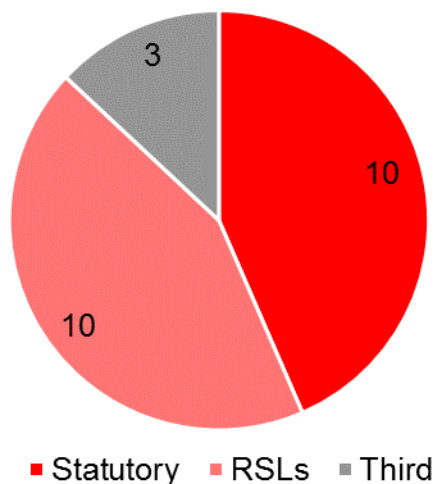
13.3 A total of 23 people were consulted: 10 representing the statutory sector; three representing registered social landlords; and 10 from third sector providers. Three Heads of service were consulted, two people occupying management positions and 18 frontline staff members.

Table 11: Service providers interviewed in A3

Statutory sector	Interviews (five participants): Housing Options staff Interview: PRS Officer Interview: Head of Service (Supporting People) Interview: Councillor (Portfolio for Supporting People, Social Care and Health) Interview: Housing Options Team Leader Interview: Housing Options Manager
RSL	Interview: Head of Housing Focus group (seven participants): Team Leader & tenancy/housing officers Joint interview (two participants): Housing Manager and Tenancy Management Officer
Third sector	Focus group (three participants): Hostel for young people frontline staff

Figure 39: Breakdown of participants by sector A3

Breakdown of participants by sector A3



Case Study Site A4

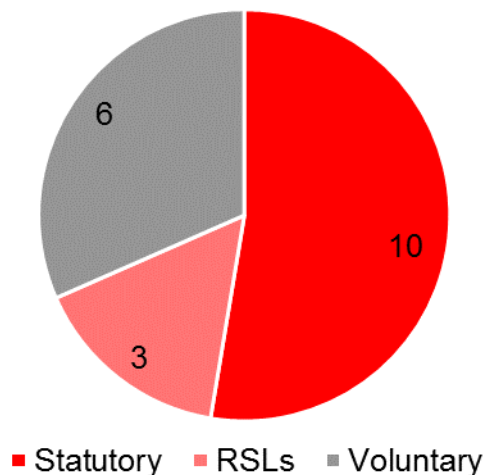
13.4 A total of 19 people were consulted: 10 representing the statutory sector; three representing registered social landlords; and six from third sector providers. One Head of service was consulted, eight people occupying management positions and 10 frontline staff members.

Table 12: Service providers interviewed in A4

Statutory sector	<p>Interview: Housing & Supporting People Lead</p> <p>Focus group (five participants): Housing Options Team Leader and Officers</p> <p>Focus group (four participants): Housing Standards Manager, Social Letting Agency Officer and 2 PRS Officers</p> <p>Interview: Supporting People Team Leader</p>
RSL	<p>Interview: Housing Services Manager (RSL 1)</p> <p>Interview: Housing Services Manager (RSL 2)</p> <p>Interview: Supporting People Services Manager (RSL 2)</p>
Voluntary sector	<p>Interview: Team Leader & Debt Advisor (advice agency)</p> <p>Focus group (5 participants): three managers of hostel providers, manager health agency, manager supported housing and support provider, frontline staff</p>

Figure 40: Breakdown of participants by sector A4

Breakdown of participants by sector A4



Case Study Site A5

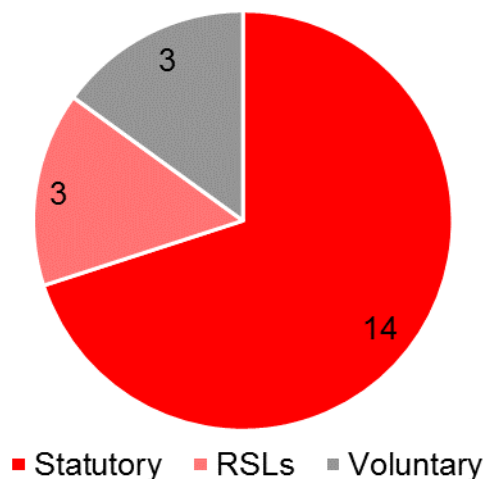
13.5 A total of 20 people were consulted: 14 representing the statutory sector; three representing registered social landlords; and three from third sector providers. Four Heads of service/Leads were consulted, six people occupying management positions and 11 frontline staff members.

Table 13: Service providers interviewed in A5

Statutory sector	<p>Interview: Service Manager (commissioning for social care and Supporting People)</p> <p>Focus group (seven participants): Housing Solutions Officers</p> <p>Interview: Development Manager/Supporting Housing (Mental Health), Health Authority</p> <p>Focus group (three participants): Councillor/Chair of regional committee & Supporting People, Housing Instruction Manager, Head Lifestyle Services (including. housing)</p> <p>Interview: Senior Homelessness & Housing Solutions Officer</p>
RSL	<p>Interview: Director of Customer Services (Housing)</p> <p>Joint interview (two participants): Director of Housing and Support, and Housing Manager</p>
Voluntary sector	<p>Interview: Project Manager (hostels – substance misuse, offenders)</p> <p>Joint interview (two participants): hostel night staff</p> <p>Interview: Manager of a night shelter</p>

Figure 41: Breakdown of participants by sector A5

Breakdown of participants by sector A5



Case Study Sites A6

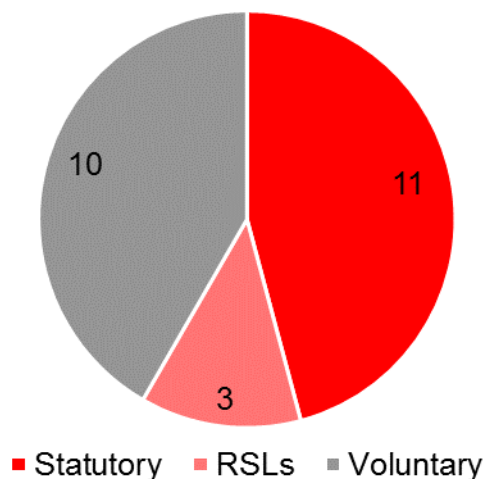
13.6 A total of 24 people were consulted: 11 representing the statutory sector; three representing registered social landlords; and 10 from third sector providers. One Head of service was consulted, 12 people occupying management positions and 11 frontline staff members.

Table 14: Service providers interviewed in A6

Statutory sector	Interview: Policy Lead (previously Gateway Referral Officer) Focus group (three participants): Housing Options Lead, Head of Housing, Housing Services Manager Focus group (seven participants): Housing Options and homelessness frontline staff
RSL	Focus group (four participants) 3 from a Homelessness prevention project (one manager, two case workers) and another*
Voluntary sector	Focus group (six participants): Supported Living Manager (one) and hostel managers (five) Interview: Manager – Tenancy Support Service (Mental Health Support) Interview: Manager (domestic abuse) Interview: Advice agency caseworker *Advice agency caseworker (attended focus group – see above)

Figure 42: Breakdown of participants by sector A6

Breakdown of participants by sector A6



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Disclaimer

Any views and errors in this report are the responsibility of the authors. The views expressed should not be assumed to be those of the Welsh Government.