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Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report

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Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014
Interim 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
RSL	Registered Social Landlord
PRS	Private rented sector
DVA	Domestic violence and abuse

1.   Introduction and Background to the Act

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 Act[1] aimed at focusing services on 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 underway.

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), and once completed, 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, through interim and final reporting, 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 comprises two waves of fieldwork, this interim report presents the findings from the first wave of fieldwork. The findings are presented in this report according to respondent group given the richness and detail of the responses received. As an interim report, no recommendations are provided within this report, but will form part of the final report.

1.5   The Interim report is structured as follows:

Chapter 1: Introduction and Background to Act
Chapter 2: Methodological approach to the evaluation
Chapter 3: Review of secondary data
Chapter 4: Findings from consultation with national stakeholders

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[1] Throughout the report this is referred to as the Act

Background and key detail of the Act

1.6   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 help 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 and the introduction of Personal Housing Plans to underpin a person-centred/partnership approach between local authorities and people who come forward for assistance.
- Increasing the length of time when people are considered to be threatened with homelessness from 28 days to 56 days.
- Changes in the application of priority need, intentionality and local connection provisions.
- Creating a new framework to involve housing associations and the private rented sector in alleviating homelessness.

1.7   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.

1.8   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.

1.9   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 no local connection. Within this stage local authorities are required to take 'reasonable steps' to prevent or relieve people from becoming homeless when they 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.

1.10   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.

1.11   Each of these duties are explained below[2].
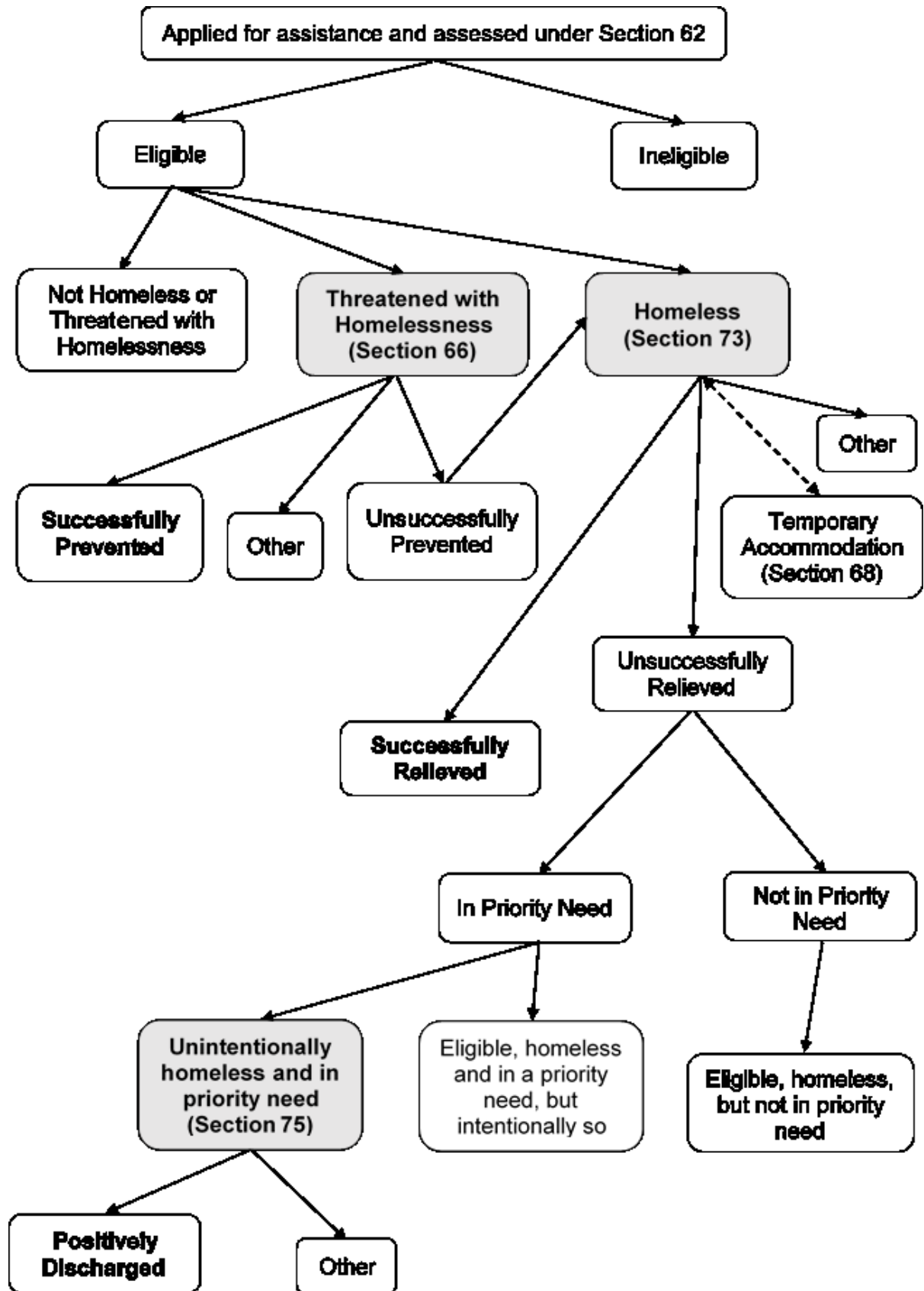
Source: Welsh Government (2016: 4)

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

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[2] This does not take account of the local connection test process

1.12   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.

1.13   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.

1.14   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.

1.15   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 and the final report will be produced in 2018. The evaluation itself involves qualitative and quantitative research methodologies and a number of complementary phases utilising a number of different research approaches. 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 the Welsh Government. To date the following activities have been completed:

- Quantitative analysis of secondary data.
- Survey and review of 22 local authorities [first wave: June–August 2016].
- 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].

To be completed:

- Case Study: Engagement and consultation with service providers.
- Survey and review of 22 local authorities.
- Quantitative analysis of secondary data.
- Case Study: Engagement and consultation with service users.
- Collation and review of existing information: policy and literature review.

Secondary analysis of homelessness statistics

2.2   The homelessness statistics collected by the Welsh Government on a quarterly basis from local authorities were examined. All of this data were taken from the publicly available Statistics for Wales (Stats Wales) website. The analysis can be found in Chapter 3.

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. The findings of those interviews are reported in Chapter 4.

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). The findings are presented in Chapter 5.

Selection of case studies

2.7   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. 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 Cymru[3] and the Wales Audit Office[4] were also taken into account, although this did not necessarily preclude inclusion. The location of case studies is not revealed in the interim or final report.

Case Study: Engagement and consultation with service users
[first wave: October 2016–January 2017]

2.8   One of the key components of this evaluation is 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 has been undertaken with people who have accessed homelessness services in each of the case study areas.

2.9   The project team worked in partnership with the 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.

2.10   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 6-8 month period. In total, 154

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[3] In Cardiff, Vale of Glamorgan, Ceredigion, Flintshire, Conwy and Rhondda Cynon Taf
[4] In Bridgend, Carmarthenshire, Denbighshire, Merthyr Tydfil and Swansea

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 staff and conducted at local authority offices, or held at 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 highly urbanised 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.

2.11   The purpose of collecting data from service users was to gather data on 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).

2.12   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 the research participants. As such, interviews in wave 1 were fairly structured and short, and designed to take no more than around 15 minutes.

2.13   The interviews focused primarily on four key themes:

- Reasons for accessing support from the homelessness team (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.

2.14   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 receive. 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.

2.15   After the completion of a wave 1 interview, participants were asked for their permission to be re-contacted in between 6–8 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 will be re-contacted and invited to attend a second interview. Wave 2 will involve an in-depth examination of the impact of the support they have received with their housing situations. The interviews in this wave are therefore likely to be much longer than in wave 1 (around 45 minutes). The findings from the service user interviews can be found in Chapter 6.

3. Review of Secondary Data

3.1   This chapter examines the homeless statistics which the Welsh Government collects on a quarterly basis from local authorities. All data is taken from the publicly available Statistics for Wales website. For the most part, direct comparisons of Pre- and Post-Act data are not possible due to changes in ways of working and collecting data. For example, prevention activities were not recorded prior to implementation of the Act, and under the new legislation the priority need category is only applied in the latter stages. Pre-Act data are first of all examined, before turning to Post-Act data. Where practicable, data are broken down by local authority in order to compare performance among the 22 local authorities.

3.2   Unless otherwise stated, all figures used here are for April 2014-March 2015 for pre-Act and April 2015-March 2016 for post-Act data. This represents the latest available full year of data. While data for rough sleepers is collected in the form of single night snapshots, this is not analysed in this chapter due to the data being presented as experimental statistics and changes in methodology (Welsh Government, 2017).

3.3   It should be noted, that as the post-Act data have only recently begun to be collected, there may be variations in the way data are collected[5]. Given concerns over the quality of data returned to the Welsh Government under the Act, the statistics have been temporarily de-designated as National Statistics[6].

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[5] The StatsWales website (https://statswales.gov.wales/Catalogue/Housing/Homelessness/) states that factors impacting on the quality and accuracy of the data collected *'are mainly due to the legislative changes introduced in April 2015 and the time needed for the local authority data providers to fully absorb the impact of these changes and to adjust their internal systems and processes accordingly'*.

[6] The StatsWales website explains this as follows: *'Whilst we have worked closely with local authorities to improve the quality of the data there is a limit to the improvements that can be made retrospectively to the 2015-16 data and some concerns over the quality and accuracy of the data remain. Although the pre-April 2015 statutory homelessness statistics were designated as National Statistics, given the concerns over data quality, a temporary de-designation of the Homelessness Statistics data for 2015-16 has been agreed with the UK Statistics Authority. The 2015-16 data as published on Stats Wales and within the accompanying release are therefore not classified as National Statistics'*.

3.4   In addition, there are a number of other data limitations. In particular, for confidentiality reasons, raw data were unavailable, which means that (1) exact figures are replaced by asterisks when there is a total of three or fewer for a particular category for the post-Act data (five or fewer for the pre-Act data); (2) all other data are rounded to the nearest three (five for the pre-Act data). The data are collected in the form of a series of aggregate tables (i.e., not individual record data). This 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[7]. Moreover, the use of asterisks means that the totals do not always tally. In order to maximise the use of raw figures and minimise the use of estimates which could skew the findings, asterisks were treated as 0 for the purpose of the analysis.

3.5   As the Act came into force three weeks into the data collection quarter (27th April 27th 2015), there was a period of overlap during which some cases were managed under the old legislation and some under the new. During this time, local authorities were asked to record cases from before the 27th April using a best fit approach. The Welsh Government believes that this may have impacted upon the accuracy of statistics in the first quarter of the post-Act data in 2015-16 (Welsh Government, 2016).

3.6   An issue raised by Shelter Cymru was that some people were receiving interventions from partner agencies that did not show up in the official statistics due to the support that they received not being recorded as reasonable steps (Shelter Cymru, 2016). This might include unplanned interventions by hostel staff, for example. The implication for the data is that the number of interventions may be underestimated, and thereby the extent to which homelessness is an issue in Wales and the amount of related work that is taking place and the funds that this requires, may also be underestimated. It should therefore be recognised that this is a potential limitation to the data, which needs to be interpreted with caution.

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[7] These asterisks are recognised as non-numerical data by statistical software packages and would therefore need to be replaced with numerical data. This means using estimates that could skew the results, particularly when comparing local authorities with smaller homeless populations.

The housing context

3.7   The population of Wales was estimated to be 3,099,100 in mid-2015, up 35,600 from the 2011 census, at which time the Black and Minority Ethnic (BME) population was 4.4% of the overall population (Office for National Statistics, 2012a, 2012b, 2016). In total, in 2015 there were 1,332,359 households across the 22 local authorities. There is considerable variation among the populations of local authority areas in Wales. Almost a third of households are concentrated in three areas: Cardiff, Swansea and Rhondda Cynon Taf with over 100,000 households in each area. In contrast, Merthyr Tydfil, Isle of Anglesey and Blaenau Gwent have just over 86,000 households between them.

3.8   All local authorities in Wales contain a mixture of rural and urban geographies, however nine local authorities are generally considered to be rural (Welsh Assembly Government, 2008), and this includes authorities in Mid, North and South Wales. In terms of housing stock, 11 out of 22 local authorities have retained ownership. Of these 11 local authorities, Caerphilly, Flintshire, Swansea, Wrexham and the Vale of Glamorgan have all voted against stock transfer, while Cardiff, Carmarthenshire, Denbighshire, Pembrokeshire and Powys are working towards meeting the Welsh Housing Quality Standard (WHQS) for their housing stock (Welsh Local Government Association, 2017).

Structure of this chapter

3.9   This chapter discusses secondary data under the following headings:

Pre-Act Data

- Households accepted as homeless.
- Decisions taken by local authority.
- Priority need by household type.
- Demographics of those in priority need.
- Temporary accommodation.
- Positive discharge.

Post-Act Data

- Households threatened with/accepted as homeless.
- Households in priority need by household type.
- Actions taken by local authority.
- Types of action taken.
- Temporary accommodation.

- Demographic characteristics.
- Positive discharge.

Pre-Act Data

Households accepted as homeless

3.10   In the years prior to the implementation of the Act, the overall homeless figures for Wales decreased from 6,515 in 2011-12, to 5,070 in 2014-15, with the most common reasons being breakdown of relationship with partner (1,165 households in 2014-15); parents/other relatives or friends no longer being able or willing to accommodate (1,125 households in 2014-15); and loss of rented or tied accommodation (1,070 households in 2014-15).

Decisions taken by local authority

3.11   When examining the decisions taken by each local authority, the authorities with the highest reported numbers of those who are eligible, unintentionally homeless and in priority need in 2014-15 were Cardiff (820 households), Swansea (795 households) and Carmarthenshire (445 households). These are also the three local authorities with the highest numbers of households presenting as homeless. On the other hand, few households were found to be eligible, unintentionally homeless and in priority need in Merthyr Tydfil (35) and the Isle of Anglesey (45).

3.12   When viewed as a proportion of overall reported cases, Vale of Glamorgan was the local authority with the highest percentage of households who were eligible, unintentionally homeless and in priority need, followed by Conwy and Powys. On the other hand, Isle of Anglesey, Cardiff and Pembrokeshire had the lowest proportion of eligible, unintentionally homeless and priority need households. There was considerable variation among local authorities, which is significant, as only those found to be eligible, unintentionally homeless and in priority need were owed a duty by the local authority. While information and advice will have been presented to these households along with varying degrees of support, data were not submitted to the Welsh Government as there was no statutory requirement for relief.

Figure 3.1: Decisions taken by local authority, 2014-15
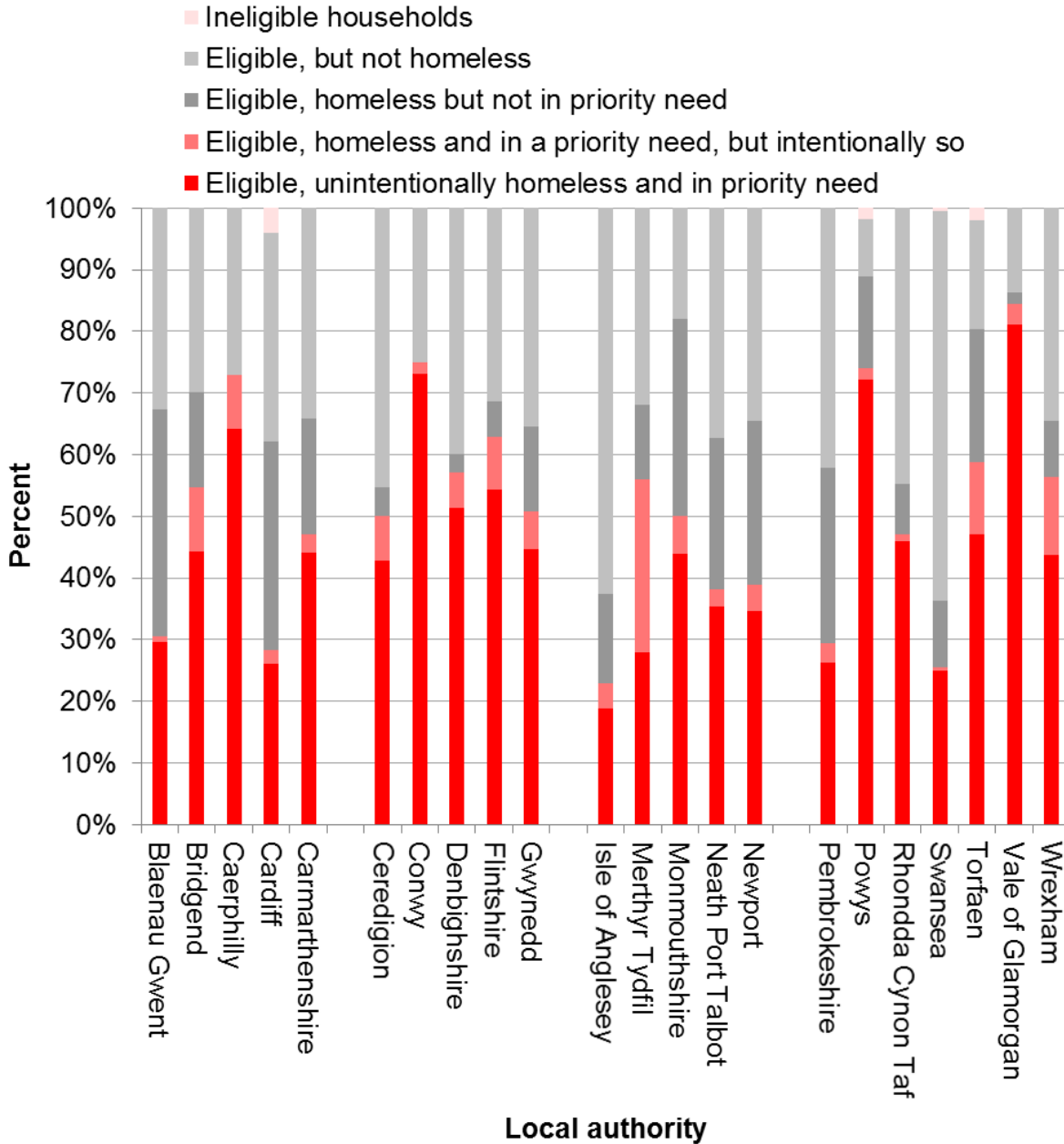
Source: Adapted from StatsWales (2015a)

Priority need by household type

3.13   Among those households accepted as homeless, when examined by priority need and household type, single person male applicants were the most common (1,640 households), followed by single parent households with dependent children (1,590 households). Single female applicants (1,085 households) and couples with dependent children (490 households), others (265 households) make up the rest.

3.14   Almost all of the single male households were assessed as vulnerable for reasons including leaving prison (780 households), physical disability, mental illness, learning disability or learning difficulties (485 households) among others. Almost all

of the single female households were pregnant (195 households) or vulnerable. The main reasons for female households to be classed as vulnerable were due to fleeing domestic violence or threatened with domestic violence (375 households), along with physical disability, mental illness, learning disability or learning difficulties (220 households).

Demographics of those in priority need

3.15   When it comes to examining demographic characteristics, more women (3,015) than men (1,995) were in priority need. For both genders, the majority were aged 25 and over. Almost 9% were from BME backgrounds (450/5,070), which is approximately double the 4.4% of the Welsh population recorded as having BME backgrounds in the 2011 census.

Table 3.1: Priority need demographics (2014-15)

Gender and age groups		N
Female	Age 16-17	125
3015	Age 18-24	945
(59%)	Age 25 and over	1945
	Female total	3015
Male	Age 16-17	95
1995	Age 18-24	455
(39%)	Age 25 and over	1445
	Male total	1995
Total Female, Male and Unknown*		5070

Ethnicity		
White	British	4255
4345	Irish	15
(86%)	Any other white background	70
	Gypsy or Irish Traveller	5
	White total	4345
BME	Mixed	60
450	Asian or Asian British	125
(9%)	Black or Black British	185
	Other ethnic group	80
	BME total	450
Total White, BME and Unknown*		5070

Note: *There were 60 cases of unknown age and gender and 275 cases of unknown ethnic origin.

Source: Adapted from StatsWales (2015b)

Temporary accommodation

3.16   In 2014-15, a total of 2,050 households were accommodated temporarily across Wales, with the majority of these households (855) in private sector accommodation of some form (in the majority of cases leased by the local authority or RSLs), and a further 475 households in hostels and women's refuges, and 440 households housed in temporary public sector accommodation. Others were in bed and breakfast (195 households) or homeless at home (85 households).

3.17   Over half of those in temporary accommodation were single person households (1,170), with those with dependent children (765 households) and other household groups (110) making up the rest. Almost three-quarters of households (1,475) had been in temporary accommodation for less than six months. However, 360 households had been in temporary accommodation for six to 12 months, and 215 households for more than a year.

Figure 3.2: Temporary accommodation length and type by household (2014-15, Jan-Mar)
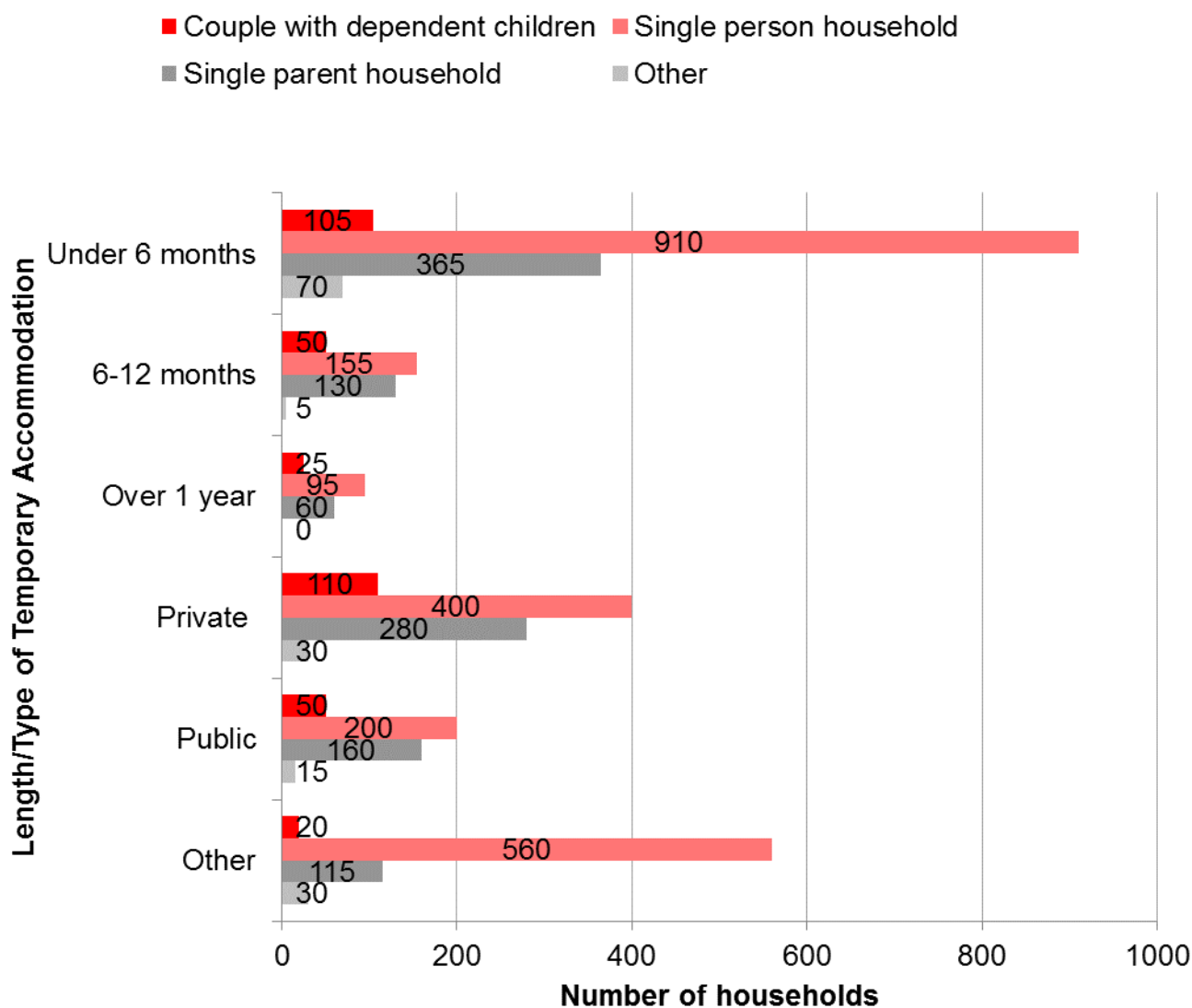
Source: Adapted from StatsWales (2015c; 2015d)

Positive discharge

3.18 Positive discharge does not necessarily mean that those households have been found accommodation by the local authority. As the table below reveals, around two-thirds of households in priority need in 2014-15 accepted an offer of accommodation, either through the allocation scheme (2,210 households) or through the private rented sector (330 households), while the remainder voluntarily ceased to occupy accommodation (760 households), were found to have become homeless intentionally (330 households), refused an offer through the allocation scheme (100 households), or ceased to be eligible (95 households).

Table 3.2: Households leaving temporary accommodation by reason for leaving and year

	2010-11	2011-12	2012-13	2013-14	2014-15
Accepted an offer of accommodation through the allocation scheme	2425	2735	2240	2090	2210
Discharged to the private sector	240	255	265	240	330
Voluntarily ceased to occupy accommodation	1175	1175	965	920	760
Became homeless intentionally	295	300	315	385	330
Refused an offer of accommodation through the allocation scheme	155	175	95	120	100
Ceased to be eligible	190	175	215	155	95
Total	4480	4810	4100	3910	3830

Source: Adapted from StatsWales (2015e)

3.19 Local authorities discharged their duties to the majority of those in priority need through allocation scheme accommodation. However, the figures also show an overall increase in the numbers discharged to the private sector over time. The figures show a reduction in the number of households for which local authorities discharged their duties. This is broadly in line with the lower numbers of applicants considered to be priority need over time.

Post-Act Data

Households threatened with/accepted as homeless

3.20   Looking at the whole of Wales, the main reasons for homelessness are now measured very differently than prior to the Act, due to preventative work being recorded, but also as intentionality may now be disregarded. Data collection is outcomes-based, and each household could have up to three outcomes: prevention under s66; help to secure accommodation under s73 (relief); duty to secure accommodation under s75 (discharge). Unsuccessful prevention should subsequently be assessed as homelessness (duty to help to secure accommodation), and unsuccessful relief may then be assessed as priority need (duty to secure accommodation). This partly explains why the total number of applications is higher than before the Act (when decisions were made at a single stage).

3.21   The figures reveal that more preventativethan relief work is taking place (in terms of the number of households), with the main reason why households are threatened with homelessness being loss of rented or tied accommodation (2,481 households), parent no longer willing or able to accommodate (1,011 households), and breakdown of relationship with partner (960 households). For those households assessed as homeless under s73 (duty to help secure accommodation), the most common reasons are breakdown of relationship with partner (1,452 households), followed by loss of rented or tied accommodation (1,251 households), and parent no longer willing or able to accommodate (1,089 households).

3.22   The number of those assessed as in priority need has decreased considerably since the Act, due to earlier action taken under the duty to prevent and duty to help to secure (only those who have been unsuccessfully relieved are counted here). The main reasons those in priority need are homeless are broadly similar to previously. This includes: breakdown of relationship with partner (336 households), loss of rented or tied accommodation (336 households), and parent no longer willing or able to accommodate (261 households).

Table 3.3: Main reason for homelessness (2015-16)

	Threatened with homelessness (s66)	Assessed as homeless (s73)	In priority need (s75)
Parent no longer willing or able to accommodate	1011	1089	261
Other relatives or friends no longer willing or able to accommodate	657	813	204
Breakdown of relationship with partner (Total)	960	1452	336
Non-violent	594	723	90
Violent	366	729	249
Violence and harassment	111	141	63
Racially motivated	*	9	3
Due to religion/belief	*	*	*
Due to gender reassignment (gender identity)	*	*	*
Due to sexual identity/orientation	*	*	*
Due to disability	6	*	*
Due to another reason	99	123	57
Mortgage arrears (repossession or other loss of home)	138	48	15
Rent arrears on social sector dwellings	288	96	9
Rent arrears on private sector dwellings	390	129	27
Loss of rented or tied accommodation	2481	1251	336
Current property unaffordable	213	60	3
Current property unsuitable	321	246	63
Prison Leaver	99	921	99
Leaving institution or care (e.g. hospital, residential home, army etc.)	246	237	93
Other (e.g. homeless in emergency, returned from abroad, etc)	213	408	54
Total households	7128	6891	1563

Source: Adapted from StatsWales (2016g; 2016h; 2016i)

Priority need by household type

3.23   When examining households in priority need by household type, it can be seen that there are slightly more single person households (771) than households with dependent children (705). The proportion of single person households has fallen following the Act, however, which suggests that this group may be fairing better at accessing support due to changes to priority need/intentionality.

3.24   The reasons for being in priority need are similar to before the Act. For single men, it is due to being vulnerable due to old age/poor health, followed by leaving prison, and risk of violence/abuse. For women, it is due to being at risk of violence/abuse followed by being vulnerable due to old age/poor health, and being pregnant.

Figure 3.3: Households in priority need (Section 75) by household type (2015-16)
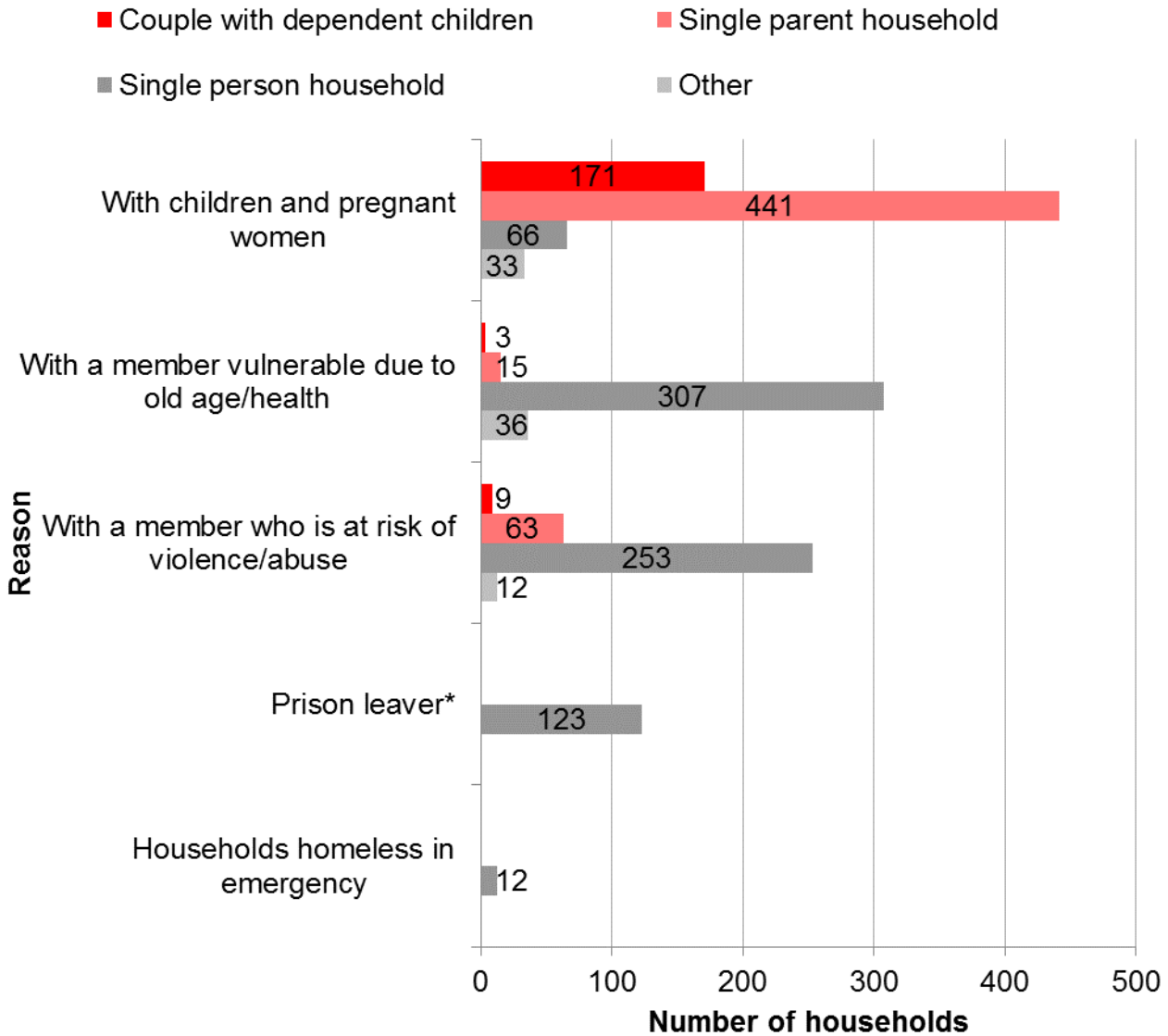
Source: Adapted from StatsWales (2016f)

Figure note: * '*Prison leaver*' refers to a former prisoner who after being released from custody has no accommodation to return to.

Actions taken by local authority

3.25　Across Wales the proportion of prevention cases that were successful was 64.5%. When it comes to relief, the proportion of successful cases dips to 45.1%, before rising again to 79.7% for positive discharge. Overall, this suggests that there is a considerable emphasis on preventative work. This is significant as local authorities no longer have the option of not developing preventative services, although the extent of provision continues to differ among local authorities.

3.26　Several local authorities stand out due to the extent of preventative work reported in their statistics. Areas which have reported the most successful preventions are Gwynedd, Caerphilly, Swansea, Flintshire and Monmouthshire. On the one hand, the data may suggest that there are a number of local authorities that could be doing more preventative work so that solutions are found for households before the relief and discharge stages. However, the statistics do not tell us about the types of cases that local authorities get and resources that they have available for preventative work, nor about other pressures that they may face. The data also does not tell us about the work undertaken under s60 (duty to provide information, advice and assistance), nor the work undertaken which results in some 'not homeless' decisions.

3.27　Interestingly though, local authorities that report higher levels of successful preventions include areas with both relatively high and low numbers of households, as well as both urban and rural authorities, and areas that have transferred and retained their stock. In other words, there are no obvious immediate commonalities between the local authorities that report higher levels of successful preventions.

Table 3.4: Positive action taken, by local authority (2015-16)

Per cent

	Successful prevention (Section 66)	Successful relief (Section 73)	Positive discharge (Section 75)
Wales average	64.5	45.1	79.7
Blaenau Gwent	58.6	63.2	100.0
Bridgend	64.2	40.3	62.5
Caerphilly	78.2	62.4	78.2
Cardiff	70.6	35.1	88.4
Carmarthenshire	53.1	43.3	85.5
Ceredigion	69.3	49.4	76.8
Conwy	70.0	39.7	70.6
Denbighshire	55.1	29.0	80.0
Flintshire	75.9	53.6	100.0
Gwynedd	84.6	64.0	94.1
Isle of Anglesey	60.1	61.1	100.0
Merthyr Tydfil	44.4	41.1	62.5
Monmouthshire	73.8	41.1	68.4
Neath Port Talbot	52.2	45.7	54.5
Newport	64.5	45.1	79.7
Pembrokeshire	68.8	59.1	87.5
Powys	71.0	48.6	75.8
Rhondda Cynon Taf	48.7	40.7	93.4
Swansea	75.4	58.2	68.8
Torfaen	64.2	32.7	68.1
Vale of Glamorgan	53.9	39.5	72.9
Wrexham	59.4	52.6	100.0

Source: Welsh Government (2016: 18)

Types of actions taken

3.28　The statistics suggest that preventative work has involved many more cases of obtaining alternative accommodation (3,534 households) than supporting people to remain in their existing homes. In terms of accommodation, large numbers of households have obtained PRS accommodation through landlord incentive schemes (819 households) and without incentives (903 households). The majority of others have gone into social housing through local authorities (705 households) and RSLs (648 households). Of those given support to remain in their own homes, in the majority of cases (594 households), this is non-financial support.

3.29   In terms of relief, the highest numbers of actions are again to the PRS, including those with landlord incentive schemes (579 households) and those without incentive schemes (498 households), this is followed by social housing, through both RSLs (513 households) and local authority housing (426 households).

Table 3.5: Actions taken to prevent and relieve (2015-16)

Remain in existing home	Prevented	Relieved
Financial support		
– Mortgage arrears interventions or mortgage rescue	21	
– Resolving rent or service charge arrears	129	
– Resolving Housing and Welfare Benefit problems	153	
– Financial payments	96	
– Debt and Financial Advice	72	
Subtotal	471	
Non-financial support		
– Mediation and conciliation	171	
– Negotiation or legal advocacy to ensure that someone can remain in accommodation in the private rented sector	237	
– Measure to prevent domestic abuse	9	
– Providing other assistance or specialist support for problems	177	
Subtotal	594	
Total: Remain in existing home	1,065	
Obtain alternative accommodation		
Accommodation arranged with friends, relatives or returning home	156	240
Social Housing - Local Authority	705	426
Social Housing - RSL	648	513
Private rented sector accommodation with landlord incentive scheme1	819	579
Private rented sector accommodation without landlord incentive scheme	903	498
Self-contained supported accommodation	168	225
Any form of non- self-contained supported accommodation	105	399
Low cost home ownership scheme, low cost market housing solution*	-	3
Other assistance or support	30	225
Total: Obtain alternative accommodation	3,534	3,108
Overall total	4,599	3,108

Note: *For example, cashless bond, finder's fee, deposit payment, rent in advance, landlord insurance payment.

Source: Adapted from StatsWales (2016a)

Temporary accommodation

3.30   In March 2016, a total of 1875 households were accommodated temporarily, which
marks a reduction from before the Act[8]. Again, the majority were in private rented
accommodation (801 households). It is still the case that single person households
are most likely to be temporarily accommodated, followed by single parents and
couples with dependent children. There are also similar trends to before the Act 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.

Figure 3.4: Temporary accommodation length and type by household (2015-16, Jan-Mar)
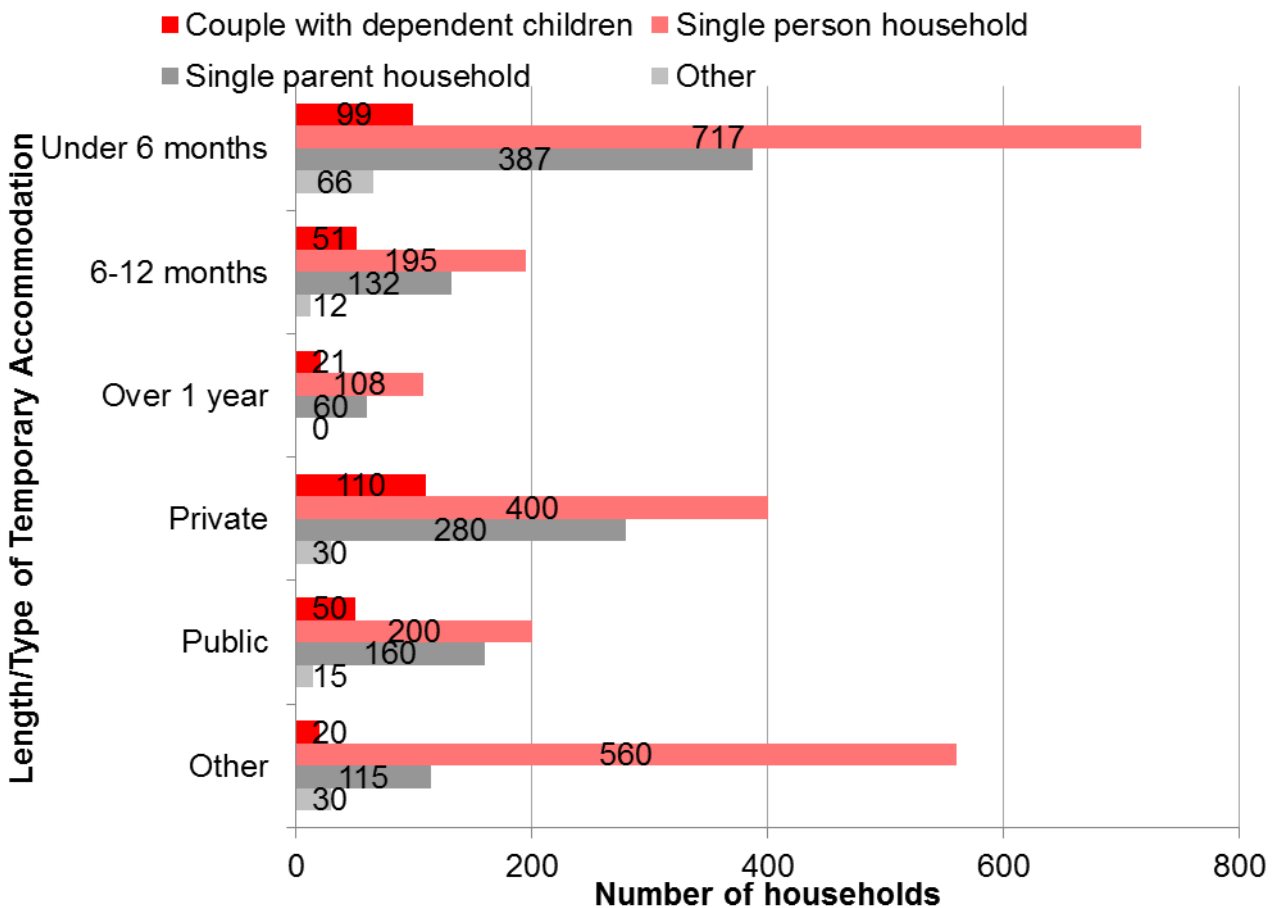
Source: Adapted from StatsWales (2016b)

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[8] The latest figures from StatsWales reveal that 1923 households were temporarily accommodated in September 2016.
These figures have not been used here as the data cannot be broken down by length of time in temporary
accommodation.

Demographic characteristics

3.31   When examining outcomes by gender, of those receiving a positive outcome at the prevention and discharge stages, the majority were women. More specifically, the female totals were 2703 for prevention and 840 for positive discharge (59% and 67% of the respective totals). The majority of those receiving a positive outcome at the relief stage were male. At the relief stage, 1677 of those receiving a positive outcome were male (54% of the total).

3.32   The numbers of BME households receiving positive outcomes at the prevention and relief stages are 294 and 207. This is 6% and 7% of cases at the respective stages, which is higher than the 4.4% of the general population of Wales from BME backgrounds. When it comes to positive discharge, the figures for the BME population (189) rise to 15% of cases.

Table 3.6 Prevention, relief and positive discharge demographics (2015-16)

Gender and age groups		Prevention	Relief	Positive discharge	Total
Female	Age 16-17	69	69	30	168
4923 (55%)	Age 18-24	798	408	300	1506
	Age 25 and over	1836	903	510	3249
	Female total	2703	1380	840	4923
Male	Age 16-17	36	69	21	126
3879 (43%)	Age 18-24	345	357	99	801
	Age 25 and over	1416	1251	285	2952
	Male total	1797	1677	405	3879
Unknown gender/age		99	51	-	150
Total Female, Male and Unknown		4599	3108	1245	8952

Ethnicity					
White					
7299 (82%)		3714	2610	975	7299
BME	Mixed	39	27	24	90
690 (8%)	Asian or Asian British	96	48	45	189
	Black or Black British	96	72	66	234
	Other ethnic group	63	60	54	177
	BME total	294	207	189	690
Total White and BME		4008	2817	1164	7989
Unknown ethnicity		591	291	81	963
Total White, BME and Unknown		4599	3108	1245	8952

Source: Adapted from StatsWales (2016d; 2016e)

Positive discharge

3.33   As noted above, positive discharge does not necessarily mean that those households have found accommodation. A greater proportion of priority need households have accepted an offer of accommodation through the allocation scheme when discharged under the new Act (1041 out of 1563 households)[9]. However, as already noted, there are considerably fewer households making it to this stage now due to the emphasis on preventative work. In contrast to the increased use of the private sector at the prevention and relief stages, only a small minority accepted a private sector offer (144). Of those not offered accommodation, several of the reasons are the same as before: voluntarily ceased to occupy accommodation (114 households), became homeless intentionally (90 households),

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[9] 66.6% of households accepted an offer of accommodation in 2015-16, compared to 57.7% in 2014-15 (2210 out of 3830 households).

refused an offer through the allocation scheme (57 households), or ceased to be eligible (27 households). Other, new reasons include: withdrawal of application (42 households), mistake of fact (six households), refusal of an offer in the PRS (nine households), refusal of an offer in suitable interim accommodation (six households), and refusal to co-operate (33 households).

Table 3.7: Reasons for discharge of duty under section 75 (2015-16)

	N
Ceased to be eligible	27
Became homeless intentionally from accommodation provided under section 75	90
Accepted an offer of accommodation through the allocation scheme (Part VI 1996 Housing Act)	1041
Accepted a private sector offer	144
Voluntarily ceased to occupy accommodation made available under section 75	114
Refusal of an offer of accommodation through the allocation scheme (Part VI 1996 Housing Act)	57
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
Withdrawal of application	42
Mistake of fact	6
Total	1,521

Source: Adapted from StatsWales (2016j)

Summary

3.34   There are clearly large differences in what is measured in the data following the introduction of the Act, due to efforts to record processes and outcomes. Direct comparisons cannot be made due to these changes, and there are limitations in the quality of the data as local authorities adjust to the new ways of working. Despite these caveats, the data can help to inform our understanding of the Act to some degree.

3.35 A major difference in the Pre- and Post-Act statistics concerns the lower numbers of households now assessed as homeless. Preventative work is now recorded and this reveals that overall, the majority of work falls into this category (in terms of numbers of households receiving support from local authorities).

3.36 However, there is significant variation in the balance between preventative, relief and discharge between local authorities.. While this could be due to some local authorities placing greater emphasis on preventative work, this is far from the whole story as local authorities face different challenges in terms of numbers of households presenting, resources available, and have different contexts in terms of housing markets to name just a few factors. There are no obvious immediate commonalities between the local authorities that have taken a more preventative approach though, with local authorities with various numbers of households, geographies and types of housing stock among those that have taken this approach.

3.37 It is clear that the PRS is utilised to a large degree in preventative and relief work. Almost half of preventative work to help households obtain alternative accommodation involves the PRS, and more households who have been successfully prevented or relieved have obtained PRS accommodation when compared to social housing.

3.38 Less people are now recorded as being in priority need as this is only taken into consideration when prevention and relief have been unsuccessful. Still, the demographics are broadly similar to before the introduction of the Act, in the sense that there are more single person households than households with dependent children. However, the proportion of single person households has reduced overall, suggesting that this group may be benefiting from the changes introduced under the Act.

3.39 Overall, there has been a slight reduction in the numbers of families in temporary accommodation since the Act was introduced. Although this could be due to changes introduced in the Act, it is not possible to know for certain. Otherwise, trends for temporary accommodation are broadly similar in terms of demographics and length of time in temporary accommodation: single person households are most likely to be temporarily accommodated, followed by single parents and couples with dependent children, and over two-thirds of temporarily accommodated households stay there for under six months.

3.40   Due to data being collected on each of the prevention, relief and discharge stages, it is now possible to see at which stage households received support by demographic characteristics. This reveals that the proportion of BME households increases at each stage.

3.41   There are also a number of things that the statistics tell us less about. Most strikingly, there is no longer a single figure for homelessness. As the same household may be counted under one or more of the preventative, relief and duty to secure categories within a single year, the categories cannot be totalled together to ascertain an overall figure. While this may make the figures more difficult to interpret, it is understandable given the new ways of working under the Act. It should be noted however, that the Welsh Government have included a new data line for the 2016-17 annual return, which seeks to identify all s62 assessments and thereby provide information about the initial assessments of all households.

4. Findings from the Consultation with National Stakeholders

4.1 This chapter presents the findings from national stakeholders whose views were gathered on the processes involved in the implementation of the Act and its potential impacts. Consultation took place in October and November in 2016. Stakeholders were asked about their views on the implications of the Act for the people they represent. 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).

4.2 The chapter is organised around the following themes which emerged from the data:

- Strengths and key achievements of the Act.
- Outcomes for homeless people.
- Impact of the Act on local authority homelessness staff.
- Impact of the Act on Registered Social Landlords.
- Impact of the Act on the role of the Private Rented Sector.
- Impact of the Act on the use of temporary accommodation.
- The role of Supporting People.
- Impact of the Act on other policy areas and agendas.
- Impact of the Act on partnership working.
- Evidence and monitoring.
- Welsh Government's role in supporting the implementation of the Act.
- Areas to address.
- Summary.

Strengths and key achievements of the Act

4.3 In the main, national stakeholders were overwhelmingly positive about the implications of the Act and welcomed its introduction and implementation. In the words of one stakeholder '*It is a more positive approach to homelessness'.* Another commented '*My opinion of the Act is very positive'.* A further stakeholder noted: '*There has been positive progress for nearly all local authorities'.* A number of key strengths of the Act were identified. Stakeholders felt that the Act offered a clearer framework for local authorities and partners to work in; provided the opportunity for earlier interventions and strengthened the prevention focus; and engendered a change in the culture of local authority homelessness services.

4.4 Most stakeholders felt that the new Act created a clearer and more consistent framework for local authorities and partner organisations to work in, and formalised preventing homelessness activities. Implicit here is the suggestion that local authorities would have been informally preventing homelessness under (and outside of) the old system, but that this would not have been recorded:

> '*It allows local authorities to formalise work they had already been trying to pursue around prevention so there is much greater clarity'.*

4.5 Specific mention was made of how the Act provided a 'coherent' and 'user friendly' framework for local authorities and partner organisations, implicating the ways in which this consolidated existing partnerships and working arrangements but with the added benefit of enhancing these partnerships and encouraging creative inter-agency ways of approaching the prevention agenda. Additionally, stakeholders suggested that the new system offers clarity both in terms of prevention activities but also allows for such activities to be recorded and monitored.

4.6 The introduction of the Act was considered to have fundamentally changed the culture and approach to addressing homelessness from 'managing' to 'preventing' homelessness. This was considered to be particularly positive since it formalises homelessness prevention activities and places prevention at the core of local authorities' remit as a statutory duty.

4.7 Therefore, earlier interventions and a focus on prevention were highlighted as significant strengths of the Act and a number of stakeholders noted that such activities meant that services were more likely to forestall homelessness. Preventing homelessness was also considered to be particularly important given the shortage of housing and the demands on support services:

'The focus on prevention has changed the way that services operate and how people work – instead of being merely responsive there is a pre-emptive ethos'.

'It is very positive especially considering the pressure on housing supply and support services: prevention is the key thing'.

4.8 Two stakeholders commented that the new Act meant that people were more likely to avoid reaching crisis point, or actually becoming homeless due to earlier interventions, and that this meant that they were less likely to go through to the final stages of the legislation. In this way the statutory duty placed upon local authorities in terms of prevention, was deemed to be critical in terms of embedding an early help model which was effective and ultimately beneficial to service users (as well as having the additional value of reducing the burden of costs associated with crisis intervention and people who were homeless).

'It forces local authorities to deal with people pre-crisis stage'.

4.9 Stakeholders identified key prevention activities under the Act as:

- Budgeting and managing debt
- Benefits advice.
- Referral to floating support workers.
- Interaction with housing advice and people seeking support.
- Mediation/helping people manage relationships with landlords especially in the private sector.
- Rent deposits/bonds.
- Signposting to Housing Options.
- Digital education.

4.10 Such prevention activities can be broadly categorised as financial advice and support; general advice and assistance; and signposting to other support agencies.

4.11 Many stakeholders felt that the positive change in culture embedded in the Act meant that the emphasis had shifted towards people, adopting a person-centred approach rather than being simply process driven. Stakeholders felt such a culture shift resulted in people being treated with more respect and receiving more support. In the words of this respondents:

'There is meaningful assistance for all and it is person-centred'.

4.12   The shift to a preventative approach was also considered to place people at the centre of service delivery for local authorities and partner organisations, engendering a 'positive energy' and a shift in the culture of local authorities, rather than being process driven:

> *'The focus on prevention and moving away from eligibility means that we are treating people as people and not just as the object of an assessment exercise. It has refreshed the approach towards homelessness in Wales with positive energy across the Voluntary Sector as well as local authorities'.*

4.13   However, another respondent suggested that the term 'person-centred' was inappropriate since the emphasis is on Housing Options staff working in partnership with service users to find housing solutions: *'The label person-centred is misleading, I prefer "side by side" as it is more of a partnership between the customer as well as agencies'*[10]. Similarly, other stakeholders noted that at the core of the Act there is a focus on individuals exercising agency to help themselves rather than being merely recipients of services:

> *'The legislation has been successful since it's changed the relationship between local authorities and people who are homeless or threatened with homelessness. It's now more of a partnership…there is a more inclusive and positive atmosphere.'*

4.14   The above quotes highlighted a tension in the operationalisation of a person-centred model and the expectation that individuals become active agents when they approach services when at risk of, or when presenting as, homeless. For some service users (for example, those with additional vulnerabilities) being a more active 'partner' is not always straightforward, achievable or immediately recognisable to service providers.

4.15   However, overall the partnership approach and the emphasis on service users taking some responsibility for finding solutions to homelessness was considered to have more positive outcomes, specifically in terms of changing ways of working and reducing the 'revolving door' effect.

> *'The ethos here is on people taking ownership and responsibility and having a stake in proceedings. This has resulted in less of a 'revolving door' for clients, and in some authorities it is clear that there has been a change in structure and*

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[10] Chapter 6 explores service users' perspectives on the emphasis on person-centred versus partnership approaches in service delivery*).*

culture. It's reinforced the message of a culture shift from problem-solving to finding solutions. Some authorities report challenges, but there is a significant culture shift on the ground. So, all in all the Act has achieved a significant boost to prevention and also to partnership working for local authorities and customers'.

4.16   Additionally, stakeholders identified Personal Housing Plans as the mechanism which embeds a partnership and person-centred approach in addressing homelessness and improved relationships between local authority staff and service users:

'Personal Housing Plans run through the legislation. This has gone down well, people like the plan, it reinforces the partner approach and the customer is also seen as a partner.

4.17   However, stakeholders reported variation across local authorities in how the legislation is being implemented in relation to the extent that Personal Housing Plans had been introduced. It was also felt that some local authorities had made more progress than others and this needed to be acknowledged. One stakeholder noted that variability in progress was inevitable due to the varying contexts in which local authorities operate and the wide range of challenges that they face:

'There are 22 local authorities with different local contexts, different sets of experiences and capacities, so inevitably there has been some variation in the way that implementation has been progressed'.

'Using Personal Housing Plans is very positive; however, the quality is variable since some local authorities take short cuts'.

4.18   The last quote suggests that there is a differing level of commitment to the introduction of the Personal Housing Plans across the 22 local authorities yet these are an essential tool within the context of a person-centred approach.

4.19   Additionally, a further two respondents explained that there was still work to be done in some authorities in other aspects of service delivery. The integration of housing benefit services in local authority homelessness teams was identified as being beneficial to implementation, while another noted that some authorities are still not working within the Act:

'Staff in the main have willingly embraced the focus, but we need to be cautious. Some local authorities have got a fair bit of work to do to maximise the prevention

focus. For example, some Housing Benefit teams are detached from the process and this could be a barrier to implementation'.

4.20   There seemed to be limited knowledge on behalf of stakeholders on the new right of review being exercised, with the majority being unable to comment. For those stakeholders who did comment, the general feeling (although this could not be evidenced) was that the numbers of reviews had reduced.

Outcomes for homeless people

4.21   An important part of the consultation with stakeholders involved focusing on the perceived and actual outcomes for homeless people since the introduction of the Act. This overarching theme is broken down into a number of sub-themes as follows:

- Increasing the levels and remit of assistance.
- The impact of increasing the length of time when people are considered to be threatened with homelessness.
- The use of Reasonable Steps.
- The use of intentionality.
- Relief.
- The use of local connection.
- The use of priority need and non-priority need.
- The impact on people with protected characteristics.
- The impact on excluded groups.
- Clarity of the pathways for homeless people with support needs.
- The new right of review being exercised.

Increasing the levels and remit of assistance

4.22   This was felt to be particularly significant for single people who, as one stakeholder commented, *'had a 'raw deal' from the previous legislation'*. Several felt that under the new legislation: *'there is increased help and support'.* Stakeholders indicated that many people who would not have received meaningful levels of assistance under the old system, were now much more likely to benefit, as the legislation widened the scope of who could be supported.

4.23   Therefore, stakeholders felt that the introduction of a prevention-orientated approach also created more positive outcomes for people who are homeless/affected by homelessness, primarily by broadening the remit of

assistance. This was thought to be evidenced by the demand for single person accommodation reported by local authorities:

'Under the new legislation - due to the focus on prevention - there are increasing numbers of single people who are receiving positive outcomes and having homelessness relieved. Local authorities and partners report a lack of single person accommodation so they must be seeing demand [from this cohort] under the new legislation'.

4.24   However, some stakeholders noted that although more people may be recorded as being assessed in the duty and offered assistance, they may in fact have received help previously [under the old system], although it may not have been officially recorded:

'More people are being assessed in the duty – but they may have been helped previously but not accounted for'.

'Doubling the period that applicants are considered to be threatened with homelessness'.

4.25   This highlights the difficulties in fully understanding the numbers of people helped under the Act.

4.26   Although two stakeholders felt unable to comment, there was overwhelming support from the remainder for doubling the period where applicants are considered to be homeless from 28 to 56 days. They felt it introduced a much stronger duty, gave local authorities more time to provide meaningful assistance as well as the opportunity to intervene earlier. Stakeholders believed that doubling the period would increase take-up of services and therefore be more effective in preventing homelessness. Additional benefits were thought to be reinforcing the framework for all authorities to operate in, embedding positive practice across Wales and reducing areas of poor practice. Respondents suggested that this strengthened the duty and allowed the time for much earlier interventions which facilitated more effective homelessness prevention:

'This is a much stronger duty; the 28 day duty was very limited, it gives local authorities the opportunity to intervene earlier so more can be done. It makes prevention more effective and provides an opportunity to intervene… so it has increased the culture of prevention'.

4.27   In this way, stakeholders reflected the potential of the 56 day duty as an enabler for the person-centred ethos of the Act in terms of giving more time for addressing individual need and for producing more holistic and coherent Personal Housing Plans.

4.28   Others suggested that it firmly established and reinforced the preventing homelessness agenda. However, a small number of stakeholders indicated that they had some concerns, particularly around the levels of awareness of services among service users, and around limiting support to 56 days. As such, two stakeholders supported extending the 56 days rule even further:

> *'We have concerns about aspects of the legislation, six months would be ideal for prevention work. People wouldn't be at crisis point for intervention which would minimise the traumatic experience for people and also costs for services'.*

4.29   One respondent expressed a concern that information needed to be widely publicised to have the best effect, and that information-sharing between services and across agendas is necessary for the preventing homelessness approach to be implemented fully:

> *'Do people know that they can approach their local authority? We need to ensure that the 56 day rule is communicated. We also need to know whether people are being supported by other programmes and how referrals are taking place'.*

4.30   In essence, the 56 day duty was viewed positively but there were still some uncertainties in terms of how this was being communicated across the sector and with service users in order to ensure a coherent and effective partnership approach within this timeframe.

> *'The reasonable steps required to be taken by local authorities to prevent and relieve homelessness'.*

4.31   When asked for their views on the reasonable steps required to be taken by local authorities to prevent and relieve homelessness, six stakeholders indicated that they could not comment. The other 11 suggested that the introduction of reasonable steps (duty to help to prevent/duty to help to secure) *should* be beneficial to everybody approaching the local authority for assistance:

> *'Reasonable steps would have been used previously but now they are a duty; this should increase pressure on services that people approach'.*

4.32   However, some stakeholders expressed a number of concerns about the interpretation and application of what 'reasonable steps' means and how it is applied: *'Until it is challenged it is difficult to say what is reasonable'*:

4.33   One stakeholder suggested that there should be more clarity and specification of what constitutes 'reasonable steps', since lack of clarity meant that local authorities interpreted and applied this differently. This was thought to potentially have adverse consequences for some groups of people:

> *'I would prefer a list of steps which should be taken. At the moment there is too much leeway for local authorities, and some groups are not sufficiently catered for, for example single homeless, rough sleepers, and those who experience 'multiple exclusions'.*

4.34   However, another stakeholder suggested that being overly prescriptive in defining what 'reasonable steps' are, may counter the person-centred ethos of the legalisation, as it undermines the ability to be flexible to the needs of individuals.

4.35   There were conflicting views on the willingness of local authorities in maintaining support. One stakeholder felt that 'reasonable steps' applied to those receiving support as well as the local authority, in that the individual had to show that they were taking action and if not, the concern was that local authorities would use this as a reason to withdraw support, citing 'unreasonably refusing to co-operate'.

> *'The use of reasonable steps' involves asking people to account for their time spent looking for accommodation. This is like Job Seekers Allowance and if people don't do it then they are found to be 'unreasonably refusing to co-operate'.*

4.36   However, another stakeholder pointed to the number of live cases as evidence that local authorities were in fact reluctant to withdraw help, thus contradicting the point made above:

> *'Local authorities are reluctant to bring services to an end. This is positive since it indicates that they are not using the legislation to opt out of helping. They are reluctant to close down cases which means that there are a high number of live cases'.*

The importance of intentionality (as outlined in s78 of the Housing (Wales) Act 2014)

4.37   Stakeholders were generally very positive about the flexible use of intentionality, particularly as it is not present in the prevention and relief stages. Although three stakeholders did not feel able to comment, several suggested that local authorities are now able to remove categories of 'deserving and undeserving' as the following comments illustrate:

> *'There is a diminished focus on intentionality and there's an understanding that local authorities have got choices about how they treat intentionality and a growing confidence that authorities can exercise some of the choice around that'.*

> *'The legislation is … intentionality 'blind' which is a significant feature. The intention was not to split resources into deserving and non-deserving categories'.*

4.38   However, some stakeholders felt that intentionality should be removed altogether:

> *'Since intentionality is only considered at the last stage - duty to secure - it should be removed as the intentionality numbers are low'.*

4.39   Another stakeholder suggested that it should be retained as a 'safety net' for local authorities, as a way of managing tenancy sustainability or to act as a disincentive for people to breach tenancies:

> *'I see a number of individuals who intentionally make themselves homeless and would be wary of getting rid of intentionality although I know there are calls for this. I'd be very nervous about when talking about consequences … we've got to start driving home that there are consequences for not living in the property properly'.*

4.40   While another stakeholder made a similar point but felt it had a negative impact:

> *'It feels like a left over from the Poor Law: deserving and non-deserving. Its continued existence is a concern as it may turn some people away. As long as it's in [the legislation] somewhere it may still be used as a kind of threat or a 'stick' to engage'.*

Introducing the duty to help relieve issues with homelessness

4.41   Four stakeholders indicated that they were unable to comment on the introduction of the duty to relieve issues with homelessness. The general feeling from those stakeholders who did respond was that this was a welcome move and they supported it since again it creates and enhances a more positive environment and framework for local authorities to operate in. They also suggested that it increases the numbers of people receiving assistance:

> *'This is having an impact; it is a more positive environment for everybody involved. It involves motivational interviewing by staff and more people are getting help as a result'.*

4.42   Other stakeholders however, felt that there may be further work to be done by some authorities regarding the duty to relieve, both in terms of variable performance across local authorities and the numbers of people being assisted at this stage of the legislation:

> *'I think that this has been positively embraced in every area although there may be individual examples where some local authorities could have done better, but this would be down to individual case circumstances, not through a lack of desire [on behalf of local authorities] to fulfil those ambitions'.*

4.43   One stakeholder commented that introducing this duty increased demand for homelessness services:

> *'More people are being helped who would have been found non-priority need which has created an increase in demand for housing options. This does create demand which has resource implications'.*

4.44   So, whilst the overall benefit of this duty was acknowledged, as the capacity to support more people, the implication in terms of resources was recognised too.

The impact of the legislation on services provided to people who have no local connection

4.45 When asked about their views on the impact of the legislation on services provided to people who have no local connection, eight stakeholders indicated that they were unable to comment. Some stakeholders suggested that local authority responses to providing services to people with no local connection depend largely on demand:

> *'Local authority responses depend on the numbers of people coming from the outside of the area. Where there are higher numbers, then the local authority will be more restrictive'.*

4.46 One stakeholder (erroneously) suggested that there is a caveat in the Code of Guidance which allows authorities not to assist people with no local connection if they have insufficient resources to do so:

> *'In terms of services offered to people with no local connection, local authorities can make a decision not to assist people with no local connection "within resources"'.*

4.47 However, this is a misinterpretation of the Code of Guidance which actually allows the prioritisation of those with a local connection 'provided they continue to meet their statutory duties to all applicants'.

4.48 A number of stakeholders suggested that people may be attracted to certain areas and that *'Local connection needs to be tightened up'.*

4.49 Cardiff in particular was identified as an area which was affected by high levels of demand and homelessness presentations from people with no local connection, although it was felt to be an issue within other urban areas. As a result of the pressures this places on temporary accommodation, two stakeholders noted that measures to re-establish local connection with place of origin has been developed in some areas.

The impact of the Act on those in priority need and those not in priority need

4.50   When asked about the impact of the Act on those in priority need and those not in priority need, three stakeholders indicated that they felt unable to comment. Two stakeholders felt the terms themselves were unhelpful:

> *'I am frustrated by these categories as there is always a need'.*

> *'I understand why they did this, and it's one way they can work in the way they have done. Eventually there should be an intention that stops [priority need] being taken into account. Once prevention beds in and demand falls, priority need should be immaterial.'*

4.51   The impact of the Act was generally felt to be very positive for those people in non-priority need since they should receive a much better service and more help than they would have done under the previous legislation. This was thought to lead to better outcomes for more people:

> *'Non-priority need are now getting significantly greater support and service than they would have done prior to implementation. Local authorities are not looking at whether or not people are in priority need on day one as was previously the case. This will lead to positive outcomes in many more cases than previously'.*

4.52   However, some stakeholders raised concerns regarding whether people who would have been priority need under the old system would lose out under the new legislation, although others perceived no change: *'There has been a positive impact on non-priority need but I am not so sure about priority need'.*

4.53   Therefore there was consensus among stakeholders that people who were not considered to be in priority need had significantly better outcomes than under the previous legislation; it was less clear whether people who were priority need were any better or worse off under the new Act. Nevertheless, overall this was viewed positively for people as well as for services; the latter having been enabled to adopt more flexible and creative approaches to individuals in need.

> *'People in priority need have the same beneficial impact on as those not in priority need: there are more bespoke and imaginative solutions being developed for households whether or not in priority need. Services are much more flexible and adaptable'.*

The impact of the Act on people with protected characteristics

4.54   When asked about their views on the impact of the Act on people with protected characteristics, five stakeholders indicated that they were unable to comment. Other stakeholders reported that there were high levels of variability in the impact on people with protected characteristics across authorities in Wales. This variation was thought to be as a result of the differences in how partnership working operates and how resources are deployed:

> *'There are varied approaches across Wales. Where support and statutory services are aligned, it is a good service. Where there is a less strategic approach, it is a work in progress'.*

4.55   Stakeholders also felt that there was variation regarding the nature of a person's impact on people with protected characteristics, with people with physical disabilities apparently being perceived as faring better than those with mental health issues who may lack capacity and find it difficult to navigate systems. It was also felt that there could be a lack of awareness of how to address such issues among local authority staff:

> *'Local authorities are good at picking up people with obvious disabilities but where it is not so obvious, for example anxiety and depression housing options don't always have an awareness of the issues'.*

4.56   Two stakeholders also indicated that the definition of vulnerability could preclude some people receiving support, and that the threshold was perhaps too low. The implication was that vulnerable people may not receive the outcomes they should:

> *'There have been some impacts of the vulnerability definition, it has a lower threshold than it should. We should have left off the definition of vulnerability, this has been criticised by the Supreme Court judges when comparing this to the English cases'.*

4.57   Some stakeholders highlighted ex-offenders' experiences of homelessness as an ongoing area of concern, in terms of the mechanisms for assessing housing need while in prison and clarity of pathways, and the potential for continued use of priority need categorisation:

> *'Prison leavers don't have their homelessness assessed while in prison. They present to Housing Options when released and find that they are nobody's priority'.*

Clarity of the pathways for homeless people with support needs

4.58   When asked for their views on the clarity of the pathways for homeless people with support needs and whether these could be improved, four stakeholders indicated that they could not comment. The remainder were positive about the use of pathways:

'The gateway process is useful and should be rolled out'.

4.59   A further stakeholder commented that the establishment of pathways could help in forging links between different agencies:

'There needs to be stronger links [between agencies] before people get into Housing Options and pathways could help here'.

4.60   One respondent explained that although it is not a legal requirement, the Code of Guidance recommends the use of pathways for people with support needs, and that the time involved in establishing these is worthwhile to achieve positive outcomes:

'It isn't a statutory requirement to have a pathway plan, but it is recommended in the guidance. Although it takes a fair amount of time to produce these, having them is positive'.

Impact of the legislation on local authority homelessness staff

4.61   An issue raised by a number of stakeholders was the impact of the Act on local authority homelessness staff. Responses centred on three key areas: increased workload; increased bureaucracy; and changes to working practices.

4.62   Several stakeholders explained that as demand for services increased, and a greater number of people were able to access assistance under the new legislation, there were associated increases in the workloads of local authority staff:

'There is much more work involved now due to increased demand as there has been an increase in demand for services'.

4.63   However, in spite of increased workloads for local authority staff, one stakeholder noted that in addition to more people receiving help, they were also achieving better outcomes:

'There has been a significant increase in amount of work in achieving those solutions, but they are achieving better solutions for more people'.

4.64 Related to this were concerns regarding the levels of paperwork and bureaucracy for housing options staff under the new Act and new systems:

'There are higher caseloads for staff and also increased bureaucracy. There are three lots of communication when moving from section 66 to 73 so it has added extra layers of bureaucracy'.

4.65 However, it was generally felt that successful implementation of the Act has created improvements in the way that local authority housing teams work in terms of a more positive approach to addressing homelessness and working practices. Many stakeholders felt that there have been positive changes for staff as a result of a shift to a person-centred approach and responded very positively in this respect.

'Implementation so far has been pretty successful, it has involved big changes in terms of both practice and culture, for example, Housing Options teams now work in a very different way. There have been changes in processes, approach and culture'.

4.66 It was generally felt that there was now more flexibility for staff, and that they are no longer constrained by the gatekeeping processes of the previous legislation. Now they are able to provide more person-focused housing solutions and they are not restricted in the type of people that they are able to assist, with the implication that staff now have more job satisfaction:

'Staff feel that they are providing a more person-centred service, helping more people, and different types of people than before. So, moving away from priority needs categories has been positive in terms of being able to shape solutions for individuals and households'.

4.67 However, some commented that the shift in organisation culture to a preventative, solutions-focused approach to homelessness had proved challenging for some frontline staff who were used to the old process-driven system. Some stakeholders indicated that for some frontline staff, the challenges were such that they have left their posts which has resulted in high staff turnover for some local authorities. Although stakeholders acknowledged that high staff turnover would represent a challenge for local authorities in terms of implementing services, some felt that this was an opportunity for new staff to join teams, and that this was positive:

'There has been quite a bit of pressure being felt in Housing Options teams, there has been some turnover in staff brought about by additional pressure and a

change in culture. Some people [working for a number of years under the old system] have found it difficult to adapt, but new people coming has helped to refresh the approach being taken.'

4.68   The turnover of staff, however, could be seen as inevitable and not unusual in the circumstances of significant change but as one stakeholder suggests, it may have raised some issues about continuity for some local authorities particularly if it is more experienced Housing Options staff who have left. Alternatively, this may be viewed positively if replacement staff are trained in the new Act only and do not have prior knowledge and experience of working under the outdated legislation.

Registered Social Landlords (RSLs)

4.69   Stakeholders were asked about their views on the contributions made by RSLs to preventing and tackling homelessness. Three felt unable to comment, while the majority felt that the contribution made by RSLs remained unchanged and that they were already playing a significant role in preventing and tackling homelessness. In the words of these stakeholders:

'I think it was already high and remains so'.

'There is no evidence to suggest it's changed positively or negatively'.

4.70   Stakeholders identified a range of key activities implemented by RSLs which work to prevent homelessness including: tenancy sustainment, working with local authorities to discharge homeless duties; and rehousing households through choice-based lettings. One stakeholder noted how:

'RSLs work very hard on tenancy sustainment which obviously limits homelessness itself'.

4.71   However, some respondents suggested that the new legislation provided a clearer framework to establish a role for RSLs in preventing and tackling homelessness, in terms of increasing co-operation between RSLs and local authorities; in providing greater clarity in what the relationship between RSLs and local authorities should be taken forward; and in how RSLs can contribute to the prevention agenda:

'It has helped to make prevention clearer. It's helped to work out where providers can step in and where they are needed… at first it wasn't clear where providers fit in with RSLs or vice versa. As the months have gone on … it has settled down into a general understanding'.

4.72   A small number of stakeholders felt that the relationship between local authorities and RSLs was *'generally collaborative, but there are some worrying anecdotes',* with some RSLs considered to work better than others. Areas of concern were highlighted as being related to people with previous breaches of tenancy agreements or households which were considered 'problematic' This was felt to be a challenge in the relationships with local authorities and RSLs, possibly indicating where the local authority interests (discharging their duties under the legislation and resolving homelessness) were counter-balanced by the priorities of RSLs in sustaining communities and limiting potential anti-social behaviour:

> *'There is generally a reasonably positive picture but some RSLs are being difficult with marginalised people in terms of issues with their behaviour, income and failings in tenancy record. So, there is still some work yet to be done. Some local authorities are not being robust enough in challenging RSLs'.*

4.73   Several stakeholders gave specific examples of where such priorities could conflict, although it was felt to be less problematic for those authorities which had retained their housing stock as they can effectively discharge duties 'in house', but for transfer authorities, there could be issues with nominations.

The Private Rented Sector

4.74   Three stakeholders felt unable to comment on the use of the private rented sector. In general, the remainder felt that the private rented sector had been used much more extensively since the introduction of the Act, and that this was positive:

> *'Local authorities are exercising the ability to discharge into the private rented sector and this is a very positive step'.*

> *'Using the private sector increases the options available for people'.*

4.75   However, some also acknowledged that there were limited alternative options for local authorities to discharge their duties:

> *'There is no option really although the private sector is a mixed bag, some good and some bad. It is sometimes more affordable than some RSLs.'*

4.76   Some stakeholders also noted there was variation in availability of private rented accommodation across local authority areas, and that it created difficulties if such stock was scarce. While others suggested that the circumstances of certain areas, where there is high demand for private rented accommodation could lead to issues of affordability:

'There has been substantial use of the private sector, it really depends on the nature of the local stock and it is easier for some areas than others. It may be the only stock available in some areas'.

4.77   Some stakeholders expressed concerns about the (relatively low) level of security of tenure in privately rented accommodation:

'We need to remember that people only get six months tenancies and question how sustainable are these tenancies.'

4.78   Some highlighted concerns about the lack of regulation of the private rented sector and suggested that the introduction of Part 1 of the 2014 Act, and the registration scheme 'Rent Smart Wales' should have a positive effect.

4.79   Stakeholders also suggested that there were variations in how the private rented sector worked with local authorities and that it appears to operate more successfully where mediation services and incentives were in place. Incentives were also felt to be key in encouraging landlords to house vulnerable tenants.

'There are different patterns of working with the private rented sector and we should be identifying best practice. This works better in some areas than others where services like mediation and incentives exist'.

4.80   One stakeholder suggested that increasing the length of assured shorthold tenancies should be considered, but that this needs to be balanced with the interests of private landlords. While some stakeholders raised concerns about the difficulties in accessing support services for tenants in the private rented sector, compared to local authority tenants:

'Tenancy support should work with people in social housing. But in the private rented sector you're on your own, you're not sure what's out there and how you get help... Private rented sector tenants don't get information about the support services available, for example support to sustain tenancies, debt advice, what to do if have problems and general rights et cetera, while council tenants get told about these things'.

4.81   Others highlighted the perceived unwillingness of private landlords to accommodate vulnerable people who may have complex needs and suggested that private landlords lacked the experience and expertise to provide support to vulnerable people in the sector. Some advocated increased support being provided to landlords to enable them to help their tenants.

> *'It is very hard for landlords to access support or signpost individuals. Local authorities and RSLs have access to support networks but they don't ... So, if private landlords had information about who to contact that would help sustain tenancies and prevent homelessness. So, if landlords take more high risk tenants, what can local authorities do to support landlords? And if landlords have high risk tenants where can they signpost to support?'*

4.82   However, another stakeholder suggested that there were examples of successful arrangements in place with Supporting People and the private rented sector:

> *'We know some local authorities are using Supporting People initiatives to use money to support vulnerable people in the private rented sector.'*

4.83   Other stakeholders raised the issue of the impact on resources of using the private rented sector, both in terms of the housing benefit bill and the provision of deposits and rent guarantees:

> *'The housing benefit bill will increase through using private landlords to discharge'.*

Temporary Accommodation

4.84   Stakeholders were asked for their views on the use of temporary accommodation. Four indicated that they could not comment, while the remainder suggested that the use of temporary accommodation had reduced, in part due to the use of the private rented sector:

> *'The use of bed and breakfast has reduced and the number of people helped has increased'.*

4.85   However, some stakeholders commented that although there had been a reduction in the use of temporary accommodation, there would always be a need for it, particularly for people with support needs, and for those people whose homelessness was difficult to resolve.

4.86   Temporary accommodation was also thought to be necessary for ex-offenders, and
        large families:

> 'It's clear there's been a decrease in temporary accommodation and B&B use,
> but prisoners are the caveat'.

The role of Supporting People

4.87   When asked about how effectively Supporting People services are enabling the
        implementation of the Act, three stakeholders indicated that they could not
        comment. Some stakeholders acknowledged that Supporting People played a
        significant preventative role prior to the introduction of the Act, with the majority
        emphasising that *'without Supporting People it would have been difficult to
        implement the act'*.

4.88   However, a number of stakeholders indicated that there was variability across local
        authority areas in the way that Supporting People services were implementing the
        legislation:

> 'There are some very close relationships but this varies across authorities and
> sometimes monitoring isn't adequate'.

4.89   Such variation across local authorities was thought to depend on the characteristics
        of a particular area and the relationships between different sectors. It was
        suggested that where there were gateways/pathways to services that this worked
        best, and that also more progress has been made in urban areas. However, one
        stakeholder felt that there was variation in how local authorities used pathways, and
        also the ways that pathways worked in particular areas. In other words, the
        existence of a gateway did not necessarily mean that access to services was
        straightforward as some worked better than others:

> 'It is better in some areas than others, some gateways are positive but some are
> not'.

4.90   Additionally, some stakeholders suggested that partnership with Supporting People
        and other agencies were not always positive and that again, these varied across
        authorities.

Impact on other policy areas and agendas

4.91   Some stakeholders were very clear about how the different agendas fitted together, and two explained how successfully preventing homelessness positively contributed to the implementation of other policy areas:

> *'It's part of a suite of preventative approaches across a range of services, for example, Social Services and Well-Being Act, Future Generations Act [in all of these] there is an emphasis on preventative services and longer-term protection around people's ability to help themselves. So there's a suite of legislative levers and frameworks that work in a complimentary way along the homelessness legislation'.*

> *'If someone's housing situation deteriorates, this will have an impact on how they use other services'.*

4.92   One stakeholder explained in detail why there needs to be better working across all agendas to optimise the success of all four pieces of legislation:

> *'The Welsh Government have passed four Acts and each focused on prevention. These include Violence against Women; Future Generations; Housing Act; Social Services and Well-being. Some local authorities are getting the Housing Act and Social Services and Well-being to work in conjunction and commissioning to make sure both Acts are responded to properly. Our concern though is how local authorities get the other two folded in … to ensure prevention. For example, you could have someone being supported via the Housing Act because they are homeless, but could they have been supported earlier through one of the other three acts? The four acts together could be revolutionary if everyone worked together across the four sectors, but we get the sense there is a real opportunity being missed'.*

4.93   Others explained that it would take time for all of the agendas to be properly embedded:

> *'On a good day, it all fits together very well but it's hard work making connections between different parts of local authorities dealing with significant pieces of legislation, especially for practitioners'.*

4.94   In the main, stakeholders talked about the impact of the Act on other agendas in positive terms, in the words of one stakeholder '*There has been a positive impact'*, although another noted:

> '*It is hard to measure impact of people not becoming homeless'.*

4.95   Stakeholders identified a number of examples of positive impacts on other agendas, for example health and social care, in terms of improved partnership working and also cost savings:

> '*In social care, we're starting to see some of these partnerships and impacts'.*

4.96   Another stakeholder noted that since Supporting People services are instrumental in implementing the Act, this results in positive impacts on health and social care:

> '*Supporting People in general goes hand in hand with Part 2 [of the Act], then good impacts on health, social care should follow'.*

4.97   Positive examples were also highlighted in relation to young people and care leaver gateways and the partnership working taking place between domestic violence and abuse services, but also in terms of how well these agendas are linked:

> '*There is a link between domestic violence and abuse and homelessness agendas. There is evidence of working in partnership with domestic violence and abuse support organisations'.*

4.98   One stakeholder suggested that there was a need for more flexibility in the way that support was provided:

> '*Is it right for homeless people to keep moving from different forms of accommodation with new sets of support staff? The hostel experience may not be a positive one…Stats for Supporting People suggest that 50% is floating support and 50% accommodation-based services. The balance in services should change to reflect the preventative agenda'.*

4.99   However, some stakeholders noted that there remained a need for the homelessness agenda to be better integrated with other agendas and that wider factors affecting homelessness and the implementation of the Act need to be taken into account, for example changes to the benefit system:

> '*The impact of wider pressures in Wales and the UK will be critical to the success of the Act. For example, the Local Housing Allowance cap may cause issues'.*

4.100   This stakeholder implicates the ways in which the Act interacts with other agendas in Wales, but also within the wider UK context. Moreover, this stakeholder also raised the issue of existing challenges, but by implication there is also some awareness of the challenges to come: for instance, in relation to the oncoming changes to the UK benefits system and the introduction of Universal Credit.

Impact on partnership working

4.101   All stakeholders were clear about the need for partnership working in order to successfully implement the Act: *'It is absolutely essential'.* This was presented both in terms of local authorities needing the services of other providers, and because homelessness usually involves other forms of exclusion, therefore solutions require input from other agencies and services (for example drug and alcohol support, counselling services and employment support:

> *'For many people, homelessness does not come as a single item, for example, job loss, family breakdown, bereavement, drug and alcohol dependency and mental health'.*

4.102   It was generally felt by all stakeholders that partnership working across a number of agencies and sectors had increased under the Act, due to the fact that the Act and Code of Guidance were developed in conjunction with key partners, so partnership working was embedded at the very beginning:

> *'It wasn't a piece of legislation that dropped out of the sky, it was something that was jointly developed between local authorities, Welsh Government, Shelter Cymru and a range of stakeholders who went through a fairly lengthy process in developing ideas, shaping the White Paper, progressing with the bill, scrutiny, and then the final Act. So, there was quite a track record and back story of people working together to try and get ready for this'.*

4.103   Stakeholders indicated a number of examples where partnerships were working well, such as work with third sector organisations and on topics such as mental health and domestic abuse. One stakeholder explained that partnership working with Shelter Cymru, third sector organisations, in particular mental health services had improved where services were embedded in local authority homeless teams:

> *'Local authorities seem to be working more collaboratively with third sector organisations and Shelter is embedded in teams in local authorities. Mental*

health services are also embedded in some local authorities, so much more effort is going into this'.

4.104 Other stakeholders commented on the more positive relationship between local authorities and Shelter Cymru – an important partner - suggesting that the relationship is now less 'confrontational' and 'combative', and instead more supportive and problem-solving:

'Shelter and local authorities work much better together; the relationship is much less confrontational and is problem-solving instead'.

4.105 While other respondents noted that relationships between local authorities and registered social landlords had improved, in part due to increased clarity around how they should work together:

'There is now a clearer set of relationships being defined on the ground, for example between local authority and RSL partners.'

'There are some good examples of local authorities and RSLs working well together'.

4.106 However, opinion was split on the effectiveness of relationships between different local authority services. Some stakeholders felt that these were beginning to work well, but most felt more work was required to establish cross-service working, especially in health, mental health, social services and Supporting People:

'It is working in some places, there is greater understanding about how things are linking together but more work needs to be done… The thread around prevention creates an environment which encourages joint working, but this is perhaps not working as well as it could do'.

Evidence and monitoring

4.107   Stakeholders were asked for their views on the way that data are collected, recorded and presented on the StatsWales website. They commented on the usefulness of the data and the processes involved in data collection and also offered views on whether they felt the data reflect the work that is being done across Wales. However, there appeared to be mixed views among respondents about the way the statistics are presented and their accessibility. Some felt the statistics were clear, while others felt that they were difficult for 'non-housing experts' to understand. Some specific issues with the statistics were mentioned, for example:

'The total number of people assisted needs to be clearer'.

'The figures of co-operation/non- co-operation and loss of contact are also very high and Shelter has also picked up on this. If people move et cetera it should be recorded as loss of contact rather than non- co-operation. Withdrawn by the applicant and local authority withdrawal on behalf of applicant needs to be redefined in the guidance and statistics. The approach taken in the stats doesn't give a true reflection of the entire needs of an area as outcomes and quantitative capture on an annual basis for example, 166 people had s66 discharged but we don't know that truly'.

'It is difficult to draw conclusions from aggregate data and it would be good to crosstab by age'.

4.108   Looking beyond the way that the statistics are presented, some stakeholders were very positive about the progress and achievements so far under the new legislation and felt this was reflected in the statistics:

'The level of preventative work is positive and data seems to support the narrative of a positive impact of the legislation'.

4.109   However, for one stakeholder, the statistics raised concerns about the outcomes among the BME population:

'Reported figures on ethnicity are concerning because section 75 discharge shows a 15% BME is hugely over-represented and is much higher than previous years, needs to be researched especially given it's only 6-7% at prevention and relief'.

4.110 Some stakeholders suggested that although a positive picture is presented through the statistics, not all aspects of services are captured. It was felt the data do not reflect the true extent of work being undertaken:

'The current data gives 'a picture'. With Supporting People and Homeless Prevention Grant it appears that some outcomes are very positive, e.g. mediation delivered by the third sector or third parties mediation has been very positive particularly regarding young people, but the stats don't necessarily reflect this. So, there is a need to make sure that this is captured and detail of how referrals are made also needs to be evidenced'.

'We need to improve the quality of the data collection methods. Stats don't reflect the work on the ground and more attention to detail required'.

'According to the stats [in one local authority] there are less than nine [domestic violence and abuse] cases but we know it is much more than this. In other words, more has been done than is recorded so we need to get this recorded in the framework'.

4.111 More specifically, other stakeholders raised concerns about whether the full extent of the work by agencies other than local government was being recorded:

'There are good levels of prevention going on but there are outliers there, for example only 23% of people are supported to remain in their own home. We need to question whether they are they getting a service before they approach Housing Options? We don't know the detail behind the stats'.

'The number of not homeless/threatened with homelessness decisions were disproportionately high. Does it show that mediation has taken place? Some quantitative figures don't necessarily reflect what's happening'.

Welsh Government's role in supporting implementation of the Act

4.112   A number of stakeholders identified the ways that Welsh Government had provided support for local authorities and partner organisations in implementing the Act. This support was considered to centre on three key areas:

- The Code of Guidance to local authorities on the allocation of accommodation and homelessness (2016).
- Resources.
- Training.

The Code of Guidance to local authorities on the allocation of accommodation and homelessness (2016)

4.113   When talking about the Welsh Government Code of Guidance, all stakeholders (apart from three who were unable to comment) felt that it was a very useful document, and made positive mention of the fact it had been developed collaboratively with the sector. Whereas some welcomed the detail of the document, others felt it was 'cumbersome' and could be streamlined.   One stakeholder pointed out the difficulty in the Guidance striking the right balance:

> *'I think the Code fell victim to the tension between the need for loads of detail so people know what they need to do, and too much detail which overwhelms. Personally, I felt it was very long and technical, but actually on balance it has worked well in terms of breaking down the individual sections of what the Act should do'.*

4.114   Another stakeholder suggested that the Code of Guidance, although a 'good document' is not often used by local authorities, leaving them vulnerable to challenges:

> *'It's a good document but often not used. Shelter challenges are often when local authorities haven't read it'.*

4.115   Two stakeholders commented that due to the working of the guidance, there is no case law, and that the phrase 'due regard' also allows room for flexible interpretation of the Guidance:

> *'Another issue is that there is no binding case law as yet and the likelihood of case law being made is unlikely due to the wording of 'due regard', which gives local authorities the option to opt out as it is non-binding'.*

4.116 A further respondent also highlighted an area where the Code of Guidance appears to contradict the Act, suggesting that in areas of high housing demand (like Cardiff) that local connection would be more likely to be used. However to clarify, the Code of Guidance (in paragraph 15.26) states that local authorities may prioritise people with a local connection when undertaking reasonable steps – for example, issuing bonds, providing rent in advance, and the use of prevention funds – they cannot refuse to accept a duty based on local connection:

'Local connection is being used in Cardiff, a contradiction is that the Guidance allows this but the legislation doesn't so this is an example of where they are at odds'.

Resources

4.117 Stakeholders highlighted the crucial role of transitional funding in implementing the Act. They generally felt that it had been used appropriately, but expressed concerns about the availability of resources once transitional funding ended:

'Transitional funding is broadly speaking used well, but there is a concern about when it's gone. Some areas need effective mediation services'.

'The impact on the profession of transitional funding is a positive thing but there are concerns about what will happen when this stops and also what will happen if people refuse or don't get help'.

4.118 Acknowledging the extra demands on local authorities, and the need for sustainable budgets, one stakeholder noted: *'Local authorities need greater certainty about budgets at a far earlier stage'.* Several stakeholders called for an extension of transitional funding and also the introduction of longer term funding to support the continued implementation of the Act. Some respondents highlighted the importance of making resources available to support the relationships between the private rented sector and local authorities, either through the provision of incentives or in the recouping of bonds. There was suggestion that resources should continue to be prioritised for Supporting People services, but also conversely that Supporting People resources could be used to better effect to support the legislation.

Training

4.119 All stakeholders indicated that the training provided so far by Welsh Government had been very useful, although while two noted that the timescale was short and very close to the introduction of the legislation, another felt sufficient opportunity

was provided for local authorities to engage. Several stakeholders emphasised the importance of continued training in order to further embedding the prevention as well as to ensure new staff were fully informed. There were calls to repeat the original training provided by Welsh Government.

'We are conscious of staff turnover, so there is always the need for refresher and reinforcement of good practice and sharing across local authorities is important'.

4.120   Another stakeholder mentioned the need for increasing awareness of the specific provisions of the Act among the population of Wales, and again resources were highlighted:

'Some local authorities have asked for more shadowing the implementation [being put] into practice with frontline staff and customers. This was part of the training programme where those who were working under the new legislation observed interactions between frontline staff and customers and learned the way some authorities operated. Some have asked for the training programme again - however this is costly and the money could be invested in rehousing'.

4.121   Stakeholders indicated that specific areas requiring training including training in relation to the interpretation of local connection; how to support people who are experiencing multiple exclusion; how to support people with protected characteristics; appropriate use of pathways; and Welfare Reform.

4.122   Some suggested that training is needed to establish how the homelessness agenda fits with other agendas, and to promote consistency across authorities:

'We need to be clear about how Part 2 [of the Act] fits into other agendas, for example floating support schemes and local authority commissioning bodies, so there needs to be a shared understanding, so training would help'.

Areas to address

4.123   Some stakeholders highlighted the need for Welsh Government to take an ongoing strategic lead in implementing the Act. This was felt to be particularly important in relation to integrating homelessness with other agendas, addressing the use of 'failure to co-operate', and being responsive to any flaws in the legislation:

'Welsh Government should carry on trying to give a lead in terms of the integration of the various strands of preventative services e.g. around social services, tackling poverty programmes. They can demonstrate leadership in making that happen…and can continue to promote leadership'.

The need for temporary and long-term accommodation

4.124 Two stakeholders commented that structural issues were not addressed by the Act; in other words, there is still a shortage of homes (in spite of using the private sector) and that rough sleeping continues to be a significant problem in Wales.

4.125 While others suggested that the removal of the right to a social tenancy may deter people from engaging with the system, and that there are less secure outcomes at the end of the Act when duty can be discharged through the private rented sector:

> *'Now there is no automatic right to a social tenancy some [people] might drop out of the system'.*

> *'There are less secure outcomes at the end, for example a private rented sector tenancy: the intention of the act was to provide a solution and not a sticking plaster'.*

4.126 Stakeholders suggested that some groups of people potentially experienced poor outcomes, in particular, single men and those experiencing multiple exclusion:

> *'Single homeless and multiply excluded are not being helped so they are currently being failed by the system'.*

Increasing the accessibility of information and advice

4.127 Stakeholders suggested that improvements to implementing the person-centred ethos could be achieved by making information and advice services more accessible, as well as monitoring outcomes of engaging with services.

Summary of key points from national stakeholder interviews

4.128 Overall, stakeholders were very positive about the introduction and implementation of the Act, commenting that it provides a clearer framework for all parties to operate within, broadens the remit of assistance and increases the numbers of people receiving meaningful help and tailored support. The Act was also thought to have embedded a change in culture and an emphasis on people rather than processes, which has facilitated earlier interventions. Stakeholders suggested that although implementation of the prevention-orientated approach varied across local authorities, overall there have been improvements to working practices and better outcomes for people who are homeless/threatened with homelessness. However, they cautioned that some gaps in knowledge remain and there is a continued need to raise awareness to prevent homelessness. Stakeholders were very positive

about the use of Personal Housing Plans in achieving person-centred support. However, some felt that these should be compulsory as people's experiences varied across authorities, while others raised concerns about increased workloads for local authority staff and the need for performance standards and monitoring.

4.129   There was support for the changes which have doubled the period where applicants are considered to be homeless from 28 to 56 days since this was thought to have several benefits: allowing for much earlier interventions; strengthening the homelessness duty; facilitating more effective prevention; increasing take-up of services; increasing good practice; and establishing and reinforce the prevention agenda. With regard to the reasonable steps required to be taken by local authorities to prevent and relieve homelessness, some stakeholders suggested that the introduction of reasonable steps (duty to prevent/duty to relieve; help to prevent and help to secure *should* be beneficial to everybody approaching the local authority for assistance, however, others expressed concerns about the variable interpretation, application and recording of 'reasonable steps'. Stakeholders were generally very positive about the flexible use of intentionality, particularly as it is not present in the prevention and relief stages, although some felt that intentionality should be removed altogether. Stakeholders appeared to have limited knowledge of the extent to which the new right of review has been exercised; some suggested that the number of reviews had reduced since the introduction of the Act, but that more information was needed on this. When asked about the use of temporary accommodation, the majority of stakeholders suggested that this had reduced, but others acknowledged that there would always be a need for temporary accommodation, for example for ex-offenders, people with support needs and large families. With regard to the introduction of the duty to help relieve issues with homelessness, the general feeling was that this was a positive move. In general, stakeholders felt that using the private sector was positive. Some highlighted concerns about the lack of regulation, variability in standards and limited security of the private sector. The majority of stakeholders felt that the contribution made by RSLs remained unchanged and that they were already playing a significant role in preventing and tackling homelessness.

4.130   Some stakeholders suggested that local authority responses to providing services to people with no local connection varied across authorities and depended largely on demand. Others highlighted the potential negative implications of a caveat in the Code of Guidance which allows authorities not to assist people with no local

connection if they have insufficient resources. It was generally felt by all stakeholders that partnership working across a number of agencies and sectors had improved under the legislation, and they agreed that partnership working was essential to successfully implementing the legislation. Stakeholders were mainly positive about the impact of the legislation on other agendas, while some indicated that it would take time for all of the agendas to be properly embedded. Some stakeholders acknowledged that Supporting People played a preventative role prior to the introduction of the legislation and all emphasised that Supporting People services were integral to the Act being successfully implemented and for the prevention of homelessness. However, a number of participants indicated that there was variability across local authority areas in the way that Supporting People services were implementing the legislation. This was seen as being related to local characteristics of services and relationships between different providers.

4.131   Stakeholders were generally positive about the pathways; however, it was felt that while there are areas of good practice, there are also areas where improvements could be made. The impact of the Act was generally felt to be very positive for those people in non-priority need. Still, some concerns were raised regarding whether people who would have been priority need under the old system may lose out under the new Act. Stakeholders reported that there were high levels of variability in the impact on people with protected characteristics across authorities in Wales. People with physical disabilities were thought to fare better than those with mental health issues who may lack capacity. All stakeholders indicated that the training was useful and also identified the need for it to be ongoing. In addition, the majority of stakeholders mentioned the need for retaining transitional funding and securing more sustainable funding in order to secure the successful long-term implementation of the Act. Practically all stakeholders indicated that the Welsh Government Code of Guidance was a very useful, albeit rather unwieldy document.

4.132   Several stakeholders felt that the statistics were not reflective of the work being done across Wales since there were discrepancies in the ways that local authorities recorded information. This was felt to be particularly significant in recording DVA; people designated not homeless/threatened with homelessness; and non- co-operation. Of those who expressed concerns about the Act, the following issues were raised: reservations about the use of the private rented sector; the provisions of the Act, particularly the use of intentionality, local connection and non- co-operation; potentially poor outcomes for excluded groups, for example those

experiencing multiple exclusion, single men and young people; the potential impact of other agendas; the future of funding; and the move to using digital technology. Key prevention activities were identified as: budgeting and managing debt; benefits advice; referral to floating support workers; interaction with housing advice and people seeking support; mediation/helping people manage relationships with landlords, especially in the private sector; rent deposits/bonds; signposting to housing options; and digital education and benefit advice.

4.133　Stakeholders suggested that unintended consequences of introducing the Act included: the impact on staff in housing advice/options teams; low numbers of people remaining in their original home; lack of case law; use of 'reasonable steps' and 'unreasonably refusing to co-operate'; variable use of Personal Housing Plans; private landlords increasing lettings fees; the use of transitional funding to support ex-offenders; and some authorities still operating outside of the legislation. Stakeholders indicated that the Welsh Government could further support implementation of the Act by monitoring effectively: continuing financial support; and providing more training for staff and awareness-raising for the general public. Finally, stakeholders indicated that rough sleeping is still an issue in Wales and there is a need for more accommodation, particularly for single men.

5. Findings from the local authority survey

5.1   This chapter outlines the results of an online survey of all 22 local authorities in Wales. Both qualitative and quantitative information was gathered relating to the different stages outlined in the Act. The purpose was to gather information about post-implementation perspectives on the Act from across Wales. 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 other local authorities. 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. Subsequent reminder emails were sent by the research team and the Welsh Government until a response had been received from each local authority.

5.2   The questionnaire, which can be found at Annex A, contained a combination of closed and open-ended questions, thereby generating both qualitative and quantitative data. Where possible, qualitative responses have been categorised and the number of similar responses quantified in order to attempt to understand the breadth of views in relation to particular parts of the Act. However, this has not always been practicable due to the sheer diversity of responses, as well as the ambiguity of some responses.

5.3   Overall, the findings presented here suggest that the preventative approach is working, although local authorities feel that there has been an increase in demand, cases are open for longer, and there are more administrative duties. There has been no dramatic increase in numbers of people presenting from other local authorities/cross border. No local authority has yet changed its position in regard to maintaining intentionality, though views are divided on whether they will maintain their positions in future. On the whole, local authorities appear to be in favour of the changes and believe that they have had positive effects.

5.4 The structure of the chapter broadly follows the stages outlined in the Act and is divided into the following sections:

- Code of Guidance.
- Information and Assessment.
- Prevention.
- Priority Need.
- Help to Secure Accommodation.
- Duty to Secure.
- Intentionality.
- Local Connection.
- Reviews and Appeals.
- Partnership Working.
- Referral Processes.
- Monitoring.
- Local Authorities' Assessment of the Effects of the Act.
- Summary and Concluding Comments.

Code of Guidance

5.5 Almost all of the local authorities have found the '*Code of Guidance*' very useful (13) or quite useful (8), while the remaining local authority found it neither useful nor not useful. Reasons given include it facilitating understanding of the Act and thereby compliance, it being comprehensive and concise, including flow charts, and being updated regularly:

> *'The Code of Guidance is very comprehensive and provides Welsh Government's understanding of the law and relevant Court Cases, therefore it is a very useful tool for Local Authorities. It also assists in developing a strategic approach to meeting housing needs and inform day-to-day operational practice'.*

> *'The revised Code of Guidance is a big improvement on the guidance issued in 2015. There is less duplication and the list of contents mirror each section'.*

5.6   A delay in receiving the Code of Guidance was commented on by four local
       authorities, particularly as it was felt that it could have informed the remodelling of
       services that took place in response to the Act. For example:

       *'There was a delay in received the Code of Guidance which resulted in the Act
       being implemented but nothing to refer to'.*

       *'We remodelled the service in readiness for the new Act before the CoG [Code of
       Guidance] was available, however it does help to focus on key aspects of the Act
       when discharging duty'.*

5.7   It was also suggested that scenarios or case studies could be included to give
       guidance on issues that frontline officers are likely to face.

       *'It would have been helpful if the guidance had given some scenarios (within the
       appendix). These would have helped officers to identify when duties were
       triggered, what notifications to send (and timescales), when to assess suitability
       etc'.*

Information and Assessment

Channels for information, advice and assistance

5.8   Local authorities were asked '*What channels does your Local Authority use to
       provide information, advice and assistance regarding accessing help for people who
       are homeless/at risk of becoming homeless under s60 of the Act?*' and could select
       more than one answer. The results show that all local authorities use face-to-face
       and telephone communication, while 17 also use web-based channels. Nine local
       authorities reported that they use other channels, including other types of telephone
       or web-based media, with single mentions being made of prison telephone
       conferencing or prison video link, SMS texts, and emails. Two local authorities also
       mentioned using fact sheets and promotional information.

Changes to information and advice services

5.9   All 22 local authorities reported that they have changed their information and advice
       service to address the needs of particular groups under s60 (4) of the Act. The
       responses varied, however, according to particular groups.

People leaving prison or youth detention accommodation:

5.10   The most common change to information and advice services was the introduction
       of a link from custody to community. This takes the form of a Prison Leaver

Pathway and involves a '*prep*' officer and/or pre-assessment model. Through engaging with the prison service, information and advice can be adapted for particular prisoners. The intention is for local authorities to get 66 days' notice ahead of release (56 days threatened with homelessness plus 10 extra days, as a result of the 10-day time target in which to make a decision on whether a duty is owed).

5.11   One local authority pointed out that there can be issues when the prisons being liaised with are in England (where the Act and the prisoner leaver pathways do not apply). Other difficulties include:

> *'The resettlement plans can sometimes be difficult to obtain within a good timeframe, the information can lack "release dates" and up-to-date risk assessments which is vital for our service. There is also still a reluctance on the part of some resettlement services to accept that not all prisoners will be treated as priority need'.*

5.12   Two other local authorities reported that they are currently reviewing systems and processes, or developing a pre-assessment model.

Young people leaving care

5.13   Around half of local authorities stated that there had been no significant changes in this area as services were already in place and well established, as were relationships with children's services. Four local authorities stated that joint work was strengthening and that they had established or were in the process of establishing a Young Person's Gateway. Another local authority stated that they were in the process of setting up multi-disciplinary working to improve local authority offers to young people. In some local authorities however, joined-upworking in this area preceded the Act coming into force. In another, structural changes within the local authority may affect this work:

> *'Our duties remain the same however social services previously employed a specialist accommodation officer within the leaving care team who had a good knowledge of legislation from both social services and housing and was able to advocate on behalf of young people. This post has now been discontinued'.*

People leaving the Regular Armed Forces of the Crown

5.14   When it comes to offering information and advice to people leaving the regular Armed Forces of the Crown, the most common response from local authorities was '*no change*' due to services already being in place[11]. It was stated by three local authorities that those in this category would be prioritised in the allocations scheme. Two other local authorities reported having very few veterans reporting but noted that they do follow the Act, for example mandatory questions on the Armed Forces are included in their housing assessment. Five authorities stated that their local authorities had signed up to the Armed Forces Covenant. This has supported initiatives including '*additional preference*' for ex-Forces personnel, along with the implementation of a Veterans Clinical Mental Health Network within the local health board and a supported housing pilot. It was not clear, however, whether this was a change following the Act. One local authority stated that it has updated its housing website following the Act, '*which service personnel are able to access in advance of discharge*', while another is in the process of developing a pre-assessment as part of the registration for housing where it will aim to give appropriate advice and assistance to people leaving the Forces.

People leaving hospital after medical treatment for mental disorder as an inpatient

5.15   Seven local authorities reported no change in this area. This is due to systems already being in place, for example partnerships with community mental health, local hospitals, health boards, and Gofal Cymru. In other local authorities it appears as if this is starting to change, or services are being reviewed. One local authority is currently developing links with the Health Board, and two others are in the process of setting up a hospital discharge protocol and pre-assessment model respectively. In one local authority, it was reported that restructuring services so that the housing and Supporting People teams are working alongside each other, has helped to improve practices in this area and they are further developing discharge meetings to help ensure accommodation options are discussed prior to discharge where possible.

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[11] The responses were received prior to the launch of the National Housing Pathway for Ex-Service Personnel in November 2016. This pathway seeks to clarify and increase the consistency of housing advice and support for the ArmedForces community in Wales.

People receiving mental health services in the community

5.16   Local authorities also reported little change in their work with people receiving mental health services in the community, due to services already being in place. However, seven local authorities emphasised that they have made or are seeking to make, changes in order to help prevent homelessness for this group. For example, one local authority highlighted the range of work that they do:

> *'Homelessness can be threatened for a number of reasons including disrepair and neighbour dispute. We have developed working protocol with Housing Enforcement and will signpost any tenant in the private rented sector with disrepair issues to them - in doing so we would highlight mental health issues and the distress disrepair is causing'.*

5.17   Still, some difficulties in offering services to people receiving mental health services in the community were noted. One local authority made the case for more specialist support for this group:

> *'There is difficulty around applicants receiving a service from the various mental health teams when they do not have an address or care of address. Many homeless applicants have mental health issues. There needs to be more specialist mental health temporary/supported accommodation'.*

Single people

5.18   Most responses stressed that information and advice services are now wider and more inclusive for single people, compared to the limited assistance which was available under the previous Act, and sought to emphasise that information and advice services are universal. Generally, this means more assistance with finding accommodation and engagement with supported housing partners. However, one local authority has launched a Single Persons Gateway that '*brought together all the individual referral processes into Supported Accommodation under one system*'.

5.19   For other local authorities, the change appears to be less dramatic. In local authorities which were undertaking preventative work before the Act, there is also a sense of little or no change. For example, one local authority stated that '*There has been no change to the procedures. We would use the Local Lettings Agency, Mediation, and carry out a full assessment and homeless prevention*'.

Rough sleepers

5.20   Just over half (12) local authorities reported that they have experienced particular issues relating to securing accommodation for rough sleepers. Some improvements have been noted since the Act, including the introduction of a solutions worker for the area and landlord incentives, both funded by the Welsh Government, as well as improved partnership working with Outreach and Resettlement. One local authority reported being better able to identify rough sleepers through Streetlink and internal reporting procedures. One local authority has undertaken several initiatives to improve services for rough sleepers:

> *'We have developed a new leaflet to advise clients of their options and also to provide general advice whilst rough sleeping. In addition to our existing provision such as hostels and other supported accommodation, we have looked to increase the options available, e.g. a Rough Sleepers Project which provides a direct placement into independent accommodation following the principles of "Housing First Model"'.*

5.21   Two local authorities considered there to have been less change in this area, due to continuing the systems in place.

People with 'protected characteristics'

5.22   Responses were divided on the extent to which information and advice services have changed to meet the needs of people with '*protected characteristics*'. Seven local authorities stated that there has been no change. Two of these went further and explained that the Equalities Act pre-dates the changes to the Act; the implication being that they were already paying due attention to the needs of people with protected characteristics. For example:

> *'We have always adhered to the Equality Act and have been trained to deal with applicants who have a protected characteristic'.*

5.23   The 15 remaining local authorities all reported some form of change, although the extent of the change was not always clear. For example, one local authority commented that services are now set up to be more inclusive and accessible, but they did not offer further detail on the specifics of this. One local authority now provides '*information on where to look for private rented sector housing options, hard to let council properties and contact details for Bond schemes*'. In another, a Gateway Referral Officer has been appointed, which it's suggested '*means more detailed information is now available and therefore better referrals can be made to the most appropriate support service*'. In two of the 15 local authorities, change was planned or in process.

People from other local authorities/cross border

5.24   The local authorities mostly stated that there had been no dramatic change in the sense that advice would still be given to people from other authorities or from England. However, one border authority stated that they did not previously need to offer information, advice and assessments under the old legislation, and in this sense there has been a big change. Another (non-border authority), reported an increase in numbers coming from other local authorities in Wales and that they needed to change the advice offered:

> '*There has been an increase in cases across borders and as a result of the no local connection there has been more assistance offered and our advice has changed accordingly. There are more requests from other LAs to transfer their cases to us*'.

5.25   Two authorities reported being conscious of the complexity that can be involved in fulfilling their duties, particularly with people who are considered vulnerable or at risk, and so both attempt to take this into consideration when offering information and advice to people from other local authorities/cross border.

Processes to decide whether a homelessness assessment is applicable under s62 of the Act

5.26   In the survey, all local authorities reported that the process is broadly similar and involves phone or in-person contact with front-facing customer services staff. As much information is collected as possible in order to make a decision on the s62 assessment. Four local authorities described how an appointment is then booked with a housing officer before a decision is made. One of these local authorities also

stated that checks may be made with third parties before meeting with the applicant. Information is verified and further information taken in order to establish whether the person is homeless/at risk of becoming homeless. If there is reason to believe that the person is homeless/at risk of becoming homeless, then an appointment will usually be made the same day. If the person is found not to be homeless/at risk of becoming homeless, then information and advice is offered.

5.27   Other local authorities reported that all contact is with experienced officers from the Homelessness Service itself (one authority), or that referrals are made to a single assessment centre (although there is a separate centre for those aged under 21) and the decision to make a homeless assessment is made during the initial interview (one authority). Another local authority referred to a drop-in service for those who are currently homeless.

Personal housing plans

5.28   Twenty out of 22 local authorities indicated that they use personal housing plans when giving information and advice. Eighteen out of the 20 local authorities found personal housing plans useful.

Figure 5.1: Views on the usefulness of personal housing plans (N=20)
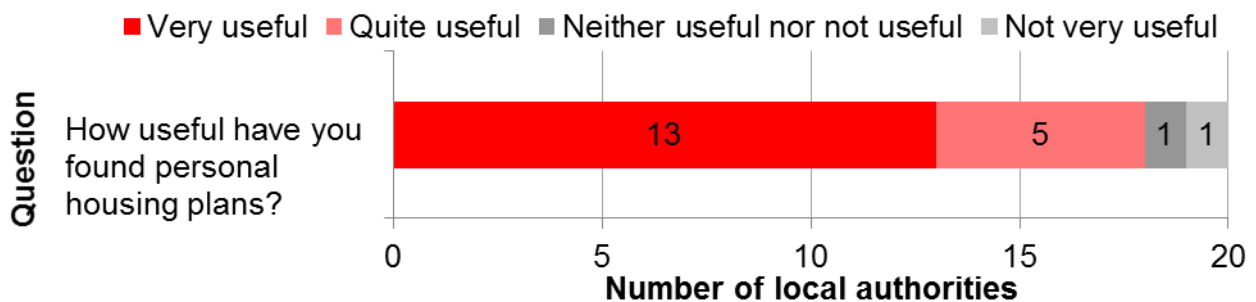
5.29   In response to the statement '*The Act has influenced your Local Authority to offer improved information, advice and assistance relating to homelessness*', 20 local authorities agreed (four strongly agreed, 16 agreed), while two local authorities gave a neutral response.

Prevention

5.30   This section focuses on the processes and activities associated with duties to prevent homelessness (s62 and s66).

5.31   Local authorities were asked about the types of preventative services they offer, whether they are provided by the local authority or other organisations, and whether there has been an increase in provision after the Act. As can be seen in the table below, most of the preventative services are offered across the local authorities. Mediation and advocacy or other representation is more likely to be offered by other organisations than in-house, as is outreach. The types of preventative activities that have been most frequently reported as having increased following the Act, are payments by way of grant or loan (which is largely provided in-house), support in managing debt, mortgage arrears or rent arrears, accommodation and information and advice.

Figure 5.2: 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

■ Local Authority Provision   ■ Non-Local Authority Provision

Service	Local Authority Provision	Non-Local Authority Provision
Outreach	12	18
Mediation	9	19
Payments by way of grant or loan	19	9
Guarantees that payments will be made	15	4
Support in managing debt, mortgage arrears or rent arrears	18	19
Security measures for applicants at risk of abuse	14	18
Advocacy or other representation	7	20
Other forms of tenancy support	16	19
Accommodation	17	19
Programmes to increase availability of affordable accommodation	15	12
Social housing lettings schemes	14	14
Information and advice	22	17
Other services, goods or facilities (Other 1)	9	6
Other services, goods or facilities (Other 2)	8	4
Other services, goods or facilities (Other 3)	6	3

Number of local authorities

Figure 5.3: Increase in provision of prevention services after the Act (N=22)

Please also indicate whether the provision of this service has increased since the Act

Service	Number of local authorities
Outreach	9
Mediation	10
Payments by way of grant or loan	18
Guarantees that payments will be made	9
Support in managing debt, mortgage arrears or rent arrears	15
Security measures for applicants at risk of abuse	8
Advocacy or other representation	7
Other forms of tenancy support	13
Accommodation	14
Programmes to increase availability of affordable accommodation	10
Social housing lettings schemes	9
Information and advice	14
Other services, goods or facilities (Other 1)	5
Other services, goods or facilities (Other 2)	4
Other services, goods or facilities (Other 3)	3

5.32   A number of the 'other services' stated could have fitted into the named categories in that they related to services such as support with rent arrears or advocacy. Those that appeared to differ included increased provision of furniture (two authorities), along with white goods and food parcels (one authority). One authority has increased the training around rights and duties of private landlords including Rent Smart Wales, and started an accessible housing register for applicants who need specific adaptations for health and disability reasons. Another authority has employed a full-time Private Rented Sector Procurement Officer, who has grown their private landlord portfolio.

Allocation of resources

5.33 Sixteen local authorities indicated that they have changed how they allocate resources in order to offer preventative services, as illustrated in the chart below. The most common change, mentioned by seven local authorities, is the more flexible use of prevention funds. There has also been some restructuring of services, as two local authorities reported setting up Gateway services, another two restructured services in other ways to utilise the private rented sector, while another local authority reported team mergers. Other changes include, an in-house CAB case worker linked to the housing service (secured through transitional funding); and moving experienced officers to the front-end of the service and creating generic roles.

Figure 5.4: Prevention resources (N=22)
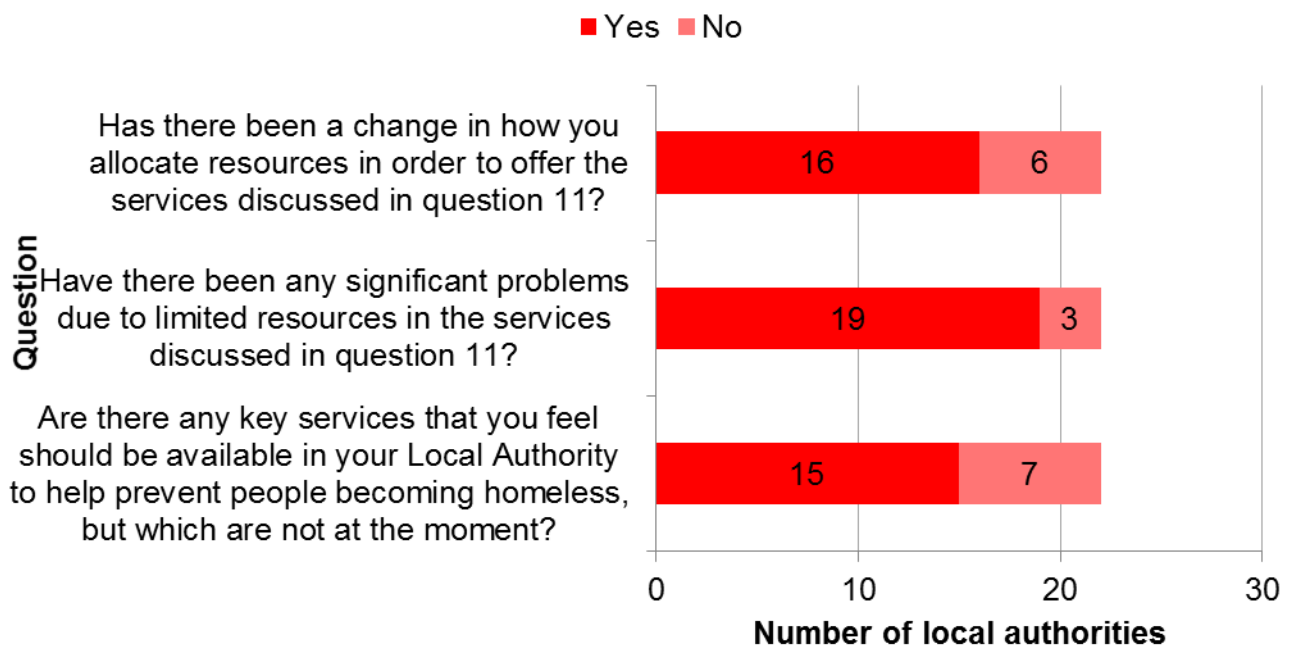
5.34　Nineteen local authorities indicated that there have been problems due to limited resources, however. Some authorities listed several problems. The most commonly stated problem related to difficulties in securing accommodation (10 authorities), primarily due to issues in attracting the private sector. Private sector issues include affordability for customers on housing benefit, paper bonds not being attractive to landlords, and lack of a guarantor service. One local authority raised a concern about a local social lettings agency:

> '*In practice this SLA* [social lettings agency] *operates more like a commercial organisation generating surpluses for the parent body. This means that many of our client group are excluded. The Council has a strategic objective to look at the pros and cons of different models of SLA* [social lettings agency] *and make a decision regarding development*'.

5.35　Five respondents referred to their concerns about transitional funding and the impact that reductions may have on assistance for deposits and preventative work. It is also felt that it has made it difficult to recruit staff due to the short-term nature of contracts:

> '*Year on year reduction in transition funding has made it difficult to recruit short-term staff placements who have the knowledge of the legislation. Training these officers has put pressure on the rest of the team*'.

5.36　Despite the changes already undertaken, 15 out of 22 responses indicated that one or more key preventative services are currently unavailable in their local authority. The most common response was a general lack of accommodation. Five local authorities reported a need for accommodation for young people and shared accommodation.

5.37　Two local authorities reported the absence of a social lettings agency. Another suggested that they require more affordable private rented sector accommodation. Specific accommodation needs were also identified by three further local authorities. These included more supported housing and direct hostels, a night stop facility for respite in cases of family breakdown, and a wet house[12], direct access hostel and accommodation for those with autism/Asperger syndrome.

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[12] A hostel where consumption of alcohol is permitted.

5.38   Three local authorities stated a need for more advocacy and mediation, since it was felt that Shelter and CAB were already working at full capacity. Other services discussed included: a need for more specialist advice agencies, for young people with mental health issues for example (one authority); the importance of '*Identifying the causes of homelessness and working specifically on these*' (one authority), and '*Programmes for perpetrators of domestic abuse*' (one authority).

5.39   One local authority felt that more generic training is required '*to deliver a programme in relation to pre-tenancy/tenancy management available to vulnerable households*'. Another local authority is in the process of developing a Homeless Prevention and Relief Service Hub which involves more integrated working across local authority departments and with partners, and a similar approach is favoured by the local authority who stated a need for '*More face-to-face, all support agencies under one roof*'.

5.40   When asked about the reasons why these services cannot be provided at the moment, 12 of the 15 local authorities that responded cited funding or financial resources and an associated lack of capacity. One authority highlighted the decisions that would need to be made in order to focus on preventative work:

   'The Council is looking at these areas of unmet need in its Housing/Homelessness Strategy. Invariably resources will be an issue and difficult decisions will be required regarding re-allocation of existing resources. The Council is looking how it can legitimately utilise Housing Revenue Account resources to work in partnership to help meet some areas of unmet need'.

5.41   Other local authorities reported facing specific issues; one local authority felt that registered social landlords were '*unwilling to change stock profile and develop*', and privatisation of a social lettings agency was an issue in another authority. Geography was an issue for one local authority who felt that the rural nature of the county made integration of services difficult as the largest towns are divided into the north and south of the county.

Processes before 56 days

5.42   All local authorities stated that they have preventative processes in place when the threat of homelessness is in more than 56 days. Local authorities described similar processes in the sense that circumstances are assessed and information and advice is given to anyone who presents. For some local authorities, services provided are similar to those for people at risk of homelessness: '*this is the same service but without the formal notification until there is a threat in 56 days*'. Three local authorities explicitly stated that they would take all reasonable steps to avoid homelessness and provide options to the applicants. Another local authority claimed '*We welcome the opportunity for early intervention*', while another conducted weekly follow-ups. In another local authority, a duty is accepted in some circumstances:

> '*If a customer presents as particularly vulnerable or it is likely there would be significant hurdles to prevent homelessness, a duty would be accepted and work would be undertaken*'.

5.43   A difference amongst the local authorities, however, depended on how long before the 56 days the applicant presented, and this typically depends on the type of risk. For example, one local authority refers cases which it sees as more difficult to prevent (release from prison/Armed Forces/hospital) to the housing choice or accessible housing registers; enquiries are accepted from prison leavers up to 84 days in advance of release.

Attitudes towards preventative work

5.44   As can be seen in the chart below, clear majorities felt that their local authorities were undertaking more preventative work, that this is more inclusive and effective, and increasing the period that applicants are considered to be threatened with homelessness to 56 days to have had a positive impact.

Figure 5.5: Views on preventative work (N=22)
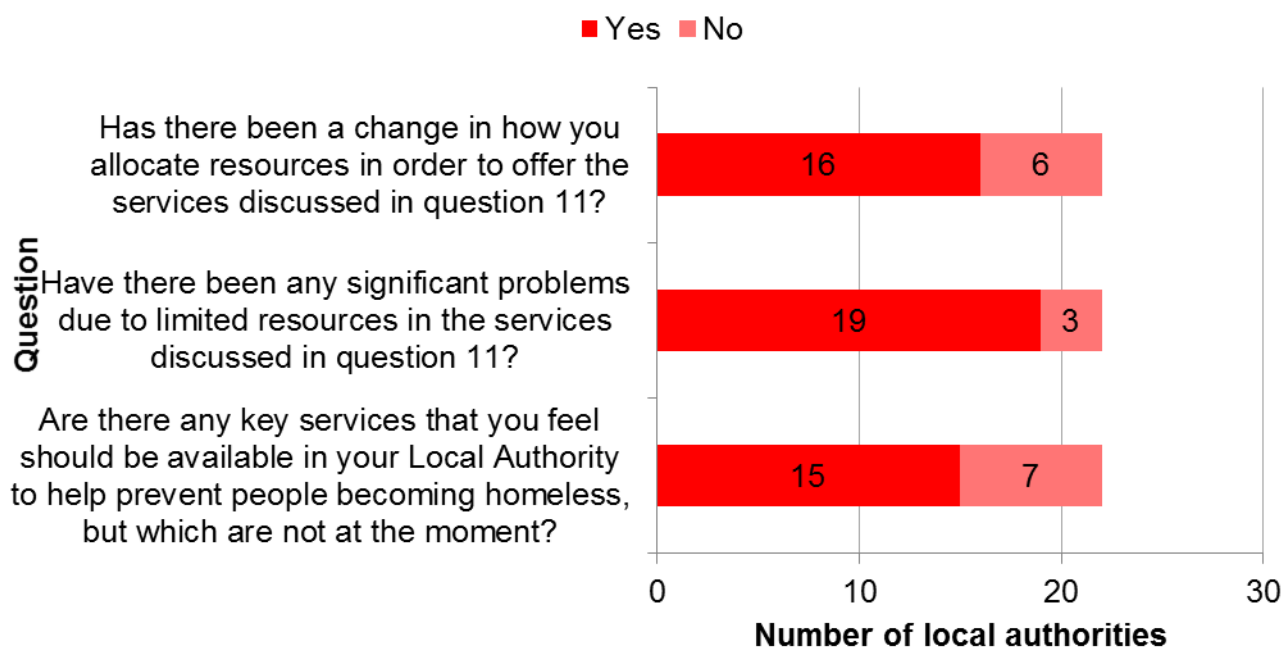
Priority Need

5.45 Twelve respondents indicated that their local authority has not changed its application of the vulnerability test under s71 since the Act came into effect[13]. Of those that have changed their application of the vulnerability test, five responses related to collecting new/more information to establish vulnerability, and five related to following guidance from the Welsh Government and updated case law.

5.46 As might be expected, following the introduction of the National Pathway for Homeless Services to Children, Young People and Adults in the Secure Estate, 21 of 22 local authorities have changed their approach to those leaving prison and/or youth custody. Most local authorities feel they have been more proactive in this area. For eight local authorities, this has involved the appointment of specific workers to link with prisons and regional prison link officers, as well as using the Prison Leaver Pathway. Five authorities stated that the type of assistance depends on whether the prison leavers are in priority need. On the other hand, one local authority indicated that they still provide temporary accommodation for all prison leavers.

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[13] S71 of the Act defines vulnerable in relation to s70 of the Act, which sets out who has priority need for accommodation.

Help to Secure

5.47   This section focuses on the processes and activities associated with the duties to secure accommodation (s73 and s75).

5.48   Local authorities were asked about the types of services provided to help secure accommodation for homeless applicants under s73 of the Act (duty to help secure accommodation), whether they are provided by the local authority or other organisations, and whether there has been an increase in provision after the Act. Again, as with the similar question asked at the prevention stage (see 5.27) the responses illustrate that most of the services are offered in each of the local authorities, although not always through in-house provision. The results mirror the responses provided to the same question under Prevention, namely that advocacy or other representation, mediation, and outreach services are the least likely to be offered by in-house provision. The types of helping to secure services most frequently reported as increasing following the Act, are similar to those identified under Prevention: payments by way of grant or loan (which is largely provided in-house); support in managing debt, mortgage arrears or rent arrears; accommodation; and information and advice.

Figure 5.6: 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 ■ Non-local

Question	Local	Non-local
Outreach	10	19
Mediation	9	19
Payments by way of grant or loan	20	6
Guarantees that payments will be made	14	4
Support in managing debt, mortgage arrears or rent arrears	14	15
Security measures for applicants at risk of abuse	11	16
Advocacy or other representation	6	19
Other forms of tenancy support	13	17
Accommodation	14	18
Programmes to increase availability of affordable accommodation	15	10
Social housing lettings schemes	11	13
Information and advice	21	12
Other services, goods or facilities (Other 1)	9	4
Other services, goods or facilities (Other 2)	4	2
Other services, goods or facilities (Other 3)	4	1

Number of local authorities

Figure 5.7: Increase in provision of help to secure accommodation after the Act (N=22)

Please also indicate whether the provision of this service has increased since the Act

Question	Number of local authorities
Outreach	8
Mediation	5
Payments by way of grant or loan	9
Guarantees that payments will be made	7
Support in managing debt, mortgage arrears or rent arrears	11
Security measures for applicants at risk of abuse	6
Advocacy or other representation	5
Other forms of tenancy support	7
Accommodation	11
Programmes to increase availability of affordable accommodation	7
Social housing lettings schemes	6
Information and advice	10
Other services, goods or facilities (Other 1)	2
Other services, goods or facilities (Other 2)	1
Other services, goods or facilities (Other 3)	1

5.49 Among the other services not already covered by the named categories were an increase in emergency housing provision (one local authority) and initiatives to put empty homes back to use (one local authority). One local authority has increased the white goods and furniture funds and food parcels. Food parcels have also been used by one local authority to '*enable clients' money to be used for rental costs*'. Other areas of increase included staffing in the form of a Private Rented Sector Procurement Officer (one local authority).

Allocation of resources under Help to Secure phase

5.50   As noted above, around half of local authorities reported increases in provision of help to secure services. Although resources were seen as an issue by fewer local authorities than at the prevention stage, 15 local authorities reported having experienced significant problems in help to secure services due to limited resources.

5.51   Among the local authorities, funding again proved the most commonly cited issue, including future reductions in Welsh Government Transition Funding, Supported People Funding and Welfare Reform. It was felt by eight local authorities that funding reductions would place restrictions on human resources and ultimately the range and volume of services on offer. The availability of accommodation was also an important issue, and linked to Welfare Reform: '*The lack of affordable housing for single young people can be problematic which will only worsen in the light of welfare reform*'. Along with general availability of private rented sector accommodation, individual local authorities also raised concerns over the availability of one-bedroom accommodation, supported housing for those with the most complex needs, and benefit-dependent families.

Use of private sector accommodation

5.52   Ten local authorities reported a slight increase in the use of private sector accommodation following the Act coming into force, and a further eight reported a significant increase. Reasons for the increases included: meeting responsibilities under the Act and increased demand for services. This has entailed the use of grant money for deposits and appointment of officers to work with the private rented sector. For those who reported no change, this is due to maintaining pre-existing relationships with private landlords (one authority), no increase in private rented properties (one authority), along with the financial climate and the local housing market picking up (one authority). The implication of the last point is that it can be difficult to find properties where the rent is affordable.

5.53   Only one local authority reported a decrease. However, this was due to a lack of supply:

> *'Whilst we can now discharge our duty into the PRS [private rented sector] overall demand for the PRS has increased without the supply increasing in line with the demand. There is a lack of shared room accommodation in the county'.*

Figure 5.8: Extent of change in use of temporary accommodation/private rented sector (N=22)
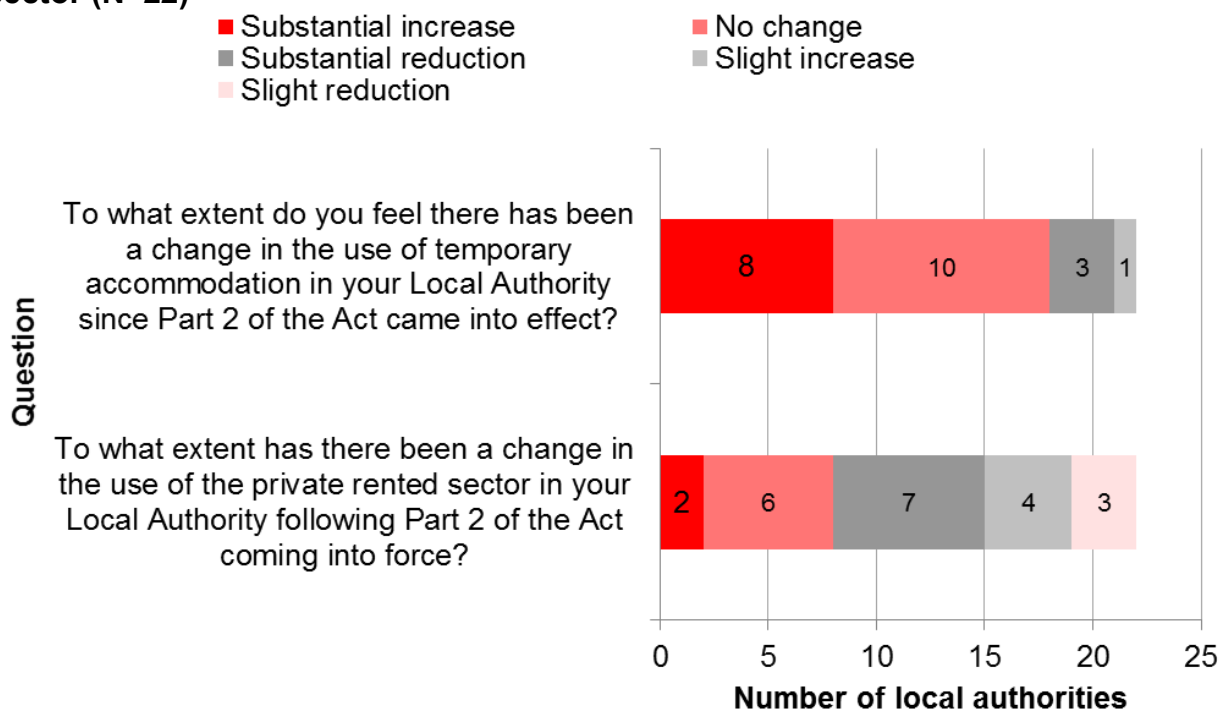
Use of temporary accommodation

5.54   Responses were quite evenly distributed when asked if there has been a change in the use of temporary accommodation since the Act came into effect. While seven respondents reported no change, eight reported some form of increase (when the slight and substantial increase categories are added together), and seven saw a decrease in their use of temporary accommodation.

5.55   Among the local authorities that reported an increase in the use of temporary accommodation, reasons include more single people requesting emergency housing assistance to prevent rough sleeping (one authority), the lack of move-on accommodation (one authority), and more competition for private rented housing which the local authority felt it meant landlords were strict in their tenant choice. (one authority). One local authority reported that although they saw no increase or decrease, they felt that people were staying in interim accommodation for longer due to barriers to the private rented sector. Another authority reported similar tendencies for single people, but felt that this had been offset by the drop in

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numbers of prison leavers as they no longer have automatic priority need. One local authority commented that the increase in preventative work means that they have '*not needed to increase the number of temporary accommodation units*'.

5.56   Of the seven local authorities who felt there had been a reduction, in two local authorities, this was attributed to undertaking more preventative work. In another authority, the shifting resources to more preventative front-end services meant the closure of a hostel. While another saw the ability to discharge into the private rented sector and removal of automatic priority for prisoners as reducing the need for temporary accommodation. Although a local authority (who saw an overall increase in their use of temporary accommodation) felt that the reduction in ex-offenders in accommodation had been counter-balanced by '*placements having to last for the 56-day duty if there is reason to believe they may be in priority need*'.

Issues relating to securing accommodation

Single people

6.52   Twenty-one of the local authorities reported experiencing issues relating to securing accommodation for single people. More specifically, there was a perceived lack of one-bedroom, shared accommodation and a lack of move on accommodation. Thirteen local authorities specifically referred to those under the age of 35:

> '*Affordability of PRS [private rented sector] accommodation for under 35 year olds has been exceptionally difficult. This has been exacerbated by the change to benefits for under 35 yr olds in social housing due to impact April 2018 and the willingness of RSLs [registered social landlords] to allocate to this age group*'.

5.57   Another authority had faced similar challenges, but reported more positive relations with the private rented sector:

> '*We do have significant challenges however we have been very successful to date in identifying housing solutions within the PRS* [private rented sector] *particularly for this category*'.

Rough sleepers

5.58　Responses were split on whether they had faced particular issues in securing accommodation for rough sleepers. In one local authority, a night shelter has helped them to meet demand. Nine local authorities felt that there have not been changes following the Act. For two of the nine local authorities, this was explained by relatively low numbers of rough sleepers in their area. Among the 12 local authorities who reported experiencing issues in securing accommodation for rough sleepers, it is not clear whether the issues are a direct consequence of the Act. Such issues include perceptions that landlords have the pick of the market, difficulties in getting rough sleepers to engage with support, and finding forms of ID which are acceptable to landlords, all of which will have been areas of difficulty before the Act.

People with 'protected characteristics'

5.59　Responses were also split as regards whether local authorities have faced particular issues securing housing for people with '*protected characteristics*' following the introduction of the Act. Eleven local authorities stated that this has not been an issue that they were not aware of particular changes since the Act. For the nine who felt there were issues, lack of suitable accommodation for people with physical disabilities was a particular issue. For example, one local authority responded that: '*It is a challenge to source-appropriate adapted accommodation in both the private rented sector and social housing*'. One local authority commented: '*Many landlords are not willing to allow adaptations to their properties, so the private rented sector can be unsuitable for people with physical health problems. Also, adaptations are often not allowed in blocks of flats in communal areas*'. While there have been challenges finding accommodation for people with physical disabilities in one local authority, they also stated that '*We have not experienced landlords be restrictive or discriminatory*'.

People from other local authorities/cross border

5.60   The majority of local authorities responded that securing accommodation for people from other local authorities/cross border had not been a particular issue or they were not aware of an increase in demand since the Act. While applicants from outside of the area might experience issues such as being placed in the lowest allocation band, '*they would still be given appropriate advice and support from the Housing Options team*'. Some local authorities, firstly attempt to reconnect those not in priority need with their local authority and have experienced only '*limited success in securing accommodation for this group*'. One local authority reported occasional issues '*due to restrictions with Bond Board and Allocation Policy*', and another stated that there had been an '*increase in the number of referrals from other LAs and also increase in presentations from out of county*'. One local authority cited a particular example, '*We did experience issues regarding referring a family back to an English local authority who were refusing to assist given the different legislation*'.

Other groups

5.61   Few local authorities mentioned issues with other groups. One local authority raised the issue of '*dual diagnosis*', however, which: '*has proved problematic in terms of providing appropriate support, resulting in difficulties in securing accommodation with landlords. We feel that Welsh Government advice is needed on EU migrant worker who cannot access Housing Benefit but can access housing. Some people have been caught by the rule changes relating to eligibility for HB since being placed*'.

Duty to Secure

5.62   Local authorities were asked '*What has been the main way in which your Local Authority has fulfilled its duty to secure accommodation for applicants in priority need (s75) when the duty in s73 ends?*' The responses reveal that social housing is the main way in which local authorities fulfil their final duties to those in priority need. Several local authorities gave more than one response, with 18 indicating social housing, nine private rented sector and two '*other*' (supported housing).

5.64   Among the local authorities selecting the social housing response, a key reason given was the lack of affordable private sector properties:

> *'The increased availability of social housing in comparison to the availability within the PRS [private rented sector] inevitably sees that social is used more'.*

> *'Private rented sector is not affordable and not sustainable for the most vulnerable homeless applicants'.*

5.65   Limited demand for social housing in some parts of the local authority area was also identified as a key reason:

> *'We primarily use the social housing sector to offer accommodation which is helped by us having limited demand in some valley areas. The use of Choice Based Lettings is another useful tool'.*

5.66   Two local authorities stated that they fulfil their duty through social housing due to the lower number of applicants now coming through to this stage and applicants' exhaustion of other options. However, only specific types of accommodation may be available:

> *'Overall families are likely to be accommodated in social housing, because we have access to much more family sized stock than for single persons'.*

5.67   For those stating private rented sector, this was mostly due to the limited stock of social housing. However, one local authority cited changes due to the Act:

> *'The PRS [private rented sector] has become more affordable for clients through the use of DHP [discretionary housing payments] and the bond scheme. It also gives clients a better chance of obtaining accommodation in the areas that they prefer to reside'.*

Intentionality

5.68   When asked if they have disregarded intentionality for any of the purposes of s75 for any specific priority need groups, five local authorities responded yes, and 17 selected no. For four of those answering yes, 16-17 year olds and care leavers had been disregarded, while for the other it was for '*persons who are or who have experienced domestic abuse*'. Only two local authorities commented on the impact, with one stating that: '*all young people are now able to access accommodation appropriate to their circumstances and needs via the Young Persons Gateway*'. In one of the five however, there has been no impact '*as the Authority did not find any*

young people in this Priority Need Group to be intentionally homeless in the previous five years'.

5.69   When asked if they have made any changes to their original position on intentionality since July 2015, all local authorities indicated that they had not. Two stated that they are reviewing their position, and two more stated that they are engaging with Shelter Cymru on this issue. Two other authorities indicated that they want more time to consider the issue when other changes arising from the Act have settled down:

> *'Although we are aware of Shelter Cymru's campaign to end intentionality for other groups ahead of 2019, we have decided to hold our current position. The Act is new, and we need to be sure of how things are bedding down before making additional changes'.*

5.70   Four local authorities were keen to maintain their position on intentionality due to the small number of cases, while three saw potential leverage to gain co-operation. One local authority reported a recent reduction in numbers of households found to have become homeless intentionally, which they attribute to more preventative work. The same local authority stressed that they continue to provide support when applying the test, as long as individuals engage with services. One local authority pointed out:

> *'There has been no evidence to suggest it needs reviewing. We haven't had any case studies where our position has detrimentally affected persons'.*

5.71   Similarly, in response to the statement '*Changing the intentionality test from a duty to a power has enabled more effective support to be offered*', the responses indicated that the change from duty to power is not widely perceived to have had any real effect. More specifically, one local authority strongly agreed, six agreed, 12 neither agreed nor disagreed, two disagreed and one strongly disagreed.

Local Connection

5.72   Local authorities were asked to outline their process for providing support for people seeking assistance without local connection. Seven local authorities stated that they continue to provide advice and support regardless of local connection, while two other local authorities prioritise reconnecting to previous local authorities. For the majority of local authorities (13), however, it is more of a combination. For example:

> *'We carry out an assessment, we provide advice and assistance on accommodation in the private sector (we do not provide deposits), we help people to return to their areas if they want to go back (pay train fares etc), if they are priority need we have accommodated a few, and referred them back to their LA as per section 82 HA 2014'.*

5.73   One local authority stated that unless there is a priority need, those people without local connection will be in a low priority category for support and housing allocation. Another pointed out that they consider local connection on a case by case basis. Similarly, a local authority outlined the ways in which they take a person's circumstances into consideration when considering how to support people without local connection:

> *'The authority understands that there may be grounds in exceptional circumstances to waiver a person's eligibility to access supported accommodation in [the local Authority] e.g. relating to extreme vulnerability or risk or to access a specialist provision not available in their local borough. Since the implementation of the Reconnection Service, we have supported 36 individuals in returning to their local borough and have also assisted an additional 19 people to find a suitable accommodation outcome in [our Authority], e.g. private rented sector'.*

5.74   In response to the question '*How do you think the absence of a local connection test in s66 and s73 (subject to s73 (2)) of the Act has affected demand for homelessness assistance in your area?*', 13local authorities perceived a slight increase in demand, while one indicated a substantial increase in demand, six reported no change, and two a slight reduction in demand.

5.75   Ten local authorities suggested that the introduction of the Act has made support more effective to those with no local connection. Ten local authorities gave a neutral response and two felt that support offered to homeless people/those at risk of becoming homeless is not more effective following the Act.

Reviews and Appeals

5.76   When asked whether the number of requests for local authority decisions to be reviewed/appealed has increased or decreased since the Act has come into force, a majority of local authorities (16) responded that both the number of requests and successful reviews and appeals have decreased, with the remaining six responding that they have increased.

5.77   The average number of reviews was 18.6 since the Act came into force. However, out of a total 391 reviews reported by 21 local authorities[14], one local authority accounts for almost two-thirds of the total (257). Of these reviews, more than half (144 reviews/56%) were successful, which is above the average for the local authorities (49%). Only four appeals were recorded among all the local authorities and these were evenly split between two authorities.

5.78   The local authority with the highest number of reviews commented that '*The increase has not been significant*' since the Act, but that there has been an increase in the number of successful reviews. They explained the increase as follows:

> '*Despite initial staff training additional investment was needed to fully understand the detail of the new legislation. This was particularly true during the transitional period when both sets of legislation were being applied*'.

5.79   Two of those who reported increased requests for local authority decisions to be reviewed/appealed recorded only a marginal rise. One local authority felt that there had been an increase in requests for decisions to be reviewed/appealed, but did not actually record figures. Others did not attempt to explain the increase.

5.80   Among those reporting that requests had decreased, this was felt to be due to more proactive work, or working outside of formal processes where possible: '*We have not had any formal review requests. If there are any issues, we deal with the situation outside of a formal process*'. Three authorities reported seeking feedback from Shelter Cymru on potentially contentious decisions.

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[14] Data for one local authority were excluded due to invalid responses.

5.81   There was a feeling among some local authorities that the decrease may only be temporary:

> *'Very few review requests so far, but it is still relatively early days and we envisage the numbers of review and appeals could increase as the legislation beds down and case law comes in'.*

> *'We assume that Shelter followed advice not to challenge in the early stages'.*

5.82   While 19 of the 22 local authorities reported that there had been a decrease in the number of successful reviews and appeals, the majority felt that there had been no real change in the reasons for reviews and appeals since the Act came into force. In one local authority, where there has been a decrease, suitability has replaced intentionality as the main reason for review.

5.83   Three authorities reported an increase. However, two of the three authorities stated that they do not keep records. Indeed, one local authority asked for their response to be disregarded for this reason. In one of the other two local authorities they attribute the increase to getting to grips with the Act.

Partnership Working

Changes to ways of working

5.84   The majority of responses (19) indicated that there had been a change in partnership working within their local authorities. Only three authorities reported no change. Among the local authorities reporting changed relationships, several reported improved relationships with adult and/or children's social services due to changes in working or restructuring of services in line with the Act as well as the Supporting People programme. Changes in one local authority illustrate how extensive the changes have been in some local authorities:

> *'Our SP [Supporting People] services have been remodelled in line with the aims of the Act and we work with other departments within the Authority to develop these i.e. Children's services, CMHT, Older persons. We have set up panel meetings with other departments such as complex case panels, young person accommodation panels etc. to meet the needs of vulnerable persons. Overall there has been stronger partnership working which continues to develop'.*

5.85   Relationships with environmental health officers were also perceived to have improved, as well as private rented sector teams (two local authorities). It is

important to note that there is still room for improvement, however. One authority suggested mental health as an area where more work is needed.

5.86   Of those that reported no change, only one authority offered a further explanationwhich focused on both strong and weak relationships:

> *'There was already a good working relationship with the private sector housing department-scheme to bring empty homes back in to use for homeless applicants. Relationship with Social Services remains the same. Still difficult to get assistance from the mental health team'.*

5.87   Relationships with various types of external partners were reported to have improved by 20 of 22 local authorities. Third sector relationships were singled out by several respondents as having improved since the Act. For example, one authority stated that '*Both statutory and third sector are working with a common goal in mind*'. The range of organisations is illustrated by a local authority who commented on the work they had done to adapt to the Act:

> *'Development of joint working protocols have been developed with: Local Hospitals, NACRO, CAB, Shelter Cymru, RSLs [registered social landlords], new and improved landlord forum. In anticipation of the Act, [our] Council developed our one stop shop and shared service model; [our] Housing Solutions, in partnership with [our] largest housing association. We have hosted away days with various public sector organisations'.*

5.88   Only two authorities indicated that there had not been a change in working with external partners. One reported this was because they have always had good working relationships, but the other identified difficulties with a mental health hospital '*contacting us on day of discharge with no prior warning*'.

Private Rented Sector

5.89   When asked how have relationships with the private rented sector developed since the Act, 16 local authorities felt relationships had improved, while two felt that they continued to be good. Not all responses explained the improvement, but the most common reason given was more contact and engagement (nine local authorities), which included landlord forums (three local authorities). As an example of this closer contact, one local authority stated that they have:

> *'Closer links to PR [private rented sector] landlords as we are continually negotiating in order to secure accommodation'.*

5.90   The next most frequent reason for an improved relationship was the employment of private rented sector development officers (six local authorities). Other reasons given include financial assistance, which has led to them 'being willing to accommodate more clients' (one local authority), and the Rent Smart Wales scheme (one authority). Three local authorities stated that relationships had not improved, all due to affordability. One local authority indicated that they were unsure whether there had been an improvement or not.

5.91   The chart below illustrates that 20 out of 21 local authorities responding to the question agreed that the Act has enabled more effective use of the private rented sector, both to prevent/relieve homelessness and to discharge homelessness duties; around a third of respondents strongly agreed with this statement. Although there were no local authorities that disagreed with either statement, there was one neutral response regarding the use of the private sector to prevent and relieve homelessness, and one missing response. There was one neutral response regarding the use of the private sector to discharge homelessness.

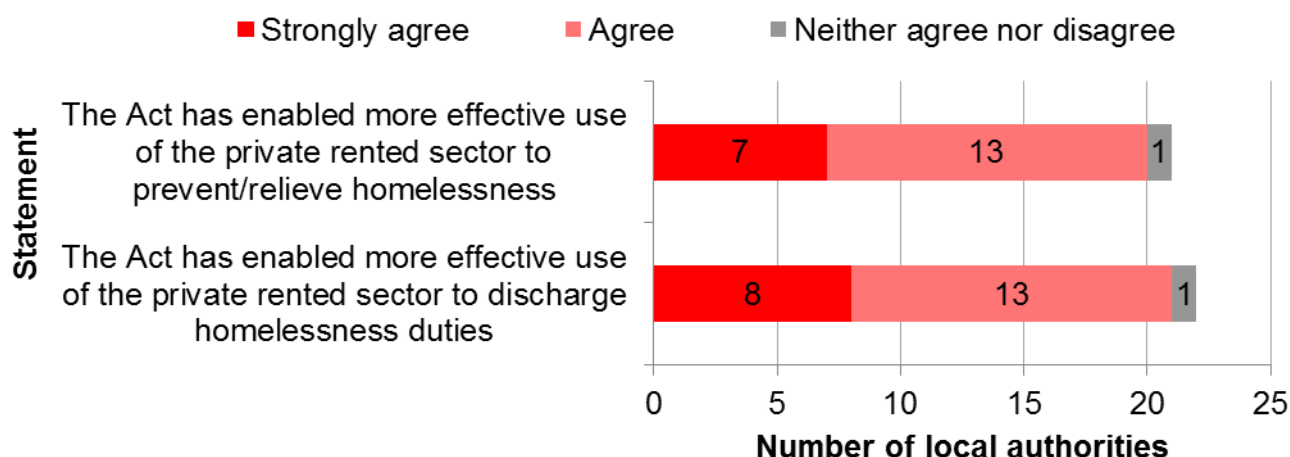**Figure 5.9: Use of the private rented sector (N=22)**

Figure note: One local authority did not respond to the first statement.

Registered Social Landlords

5.92   Responses were more evenly distributed as to whether the Act has enabled more
        effective co-operation with registered social landlords. Eight local authorities
        agreed, while nine neither agreed nor disagreed, and five disagreed.

5.93   Several qualitative responses were positive, and indicated that good relationships
        with registered social landlords had been maintained over time. Key changes in
        some authorities ranged from '*sharing more detailed info over acceptance numbers
        under each stage of the legislation*' to arranging steering groups for regular contact
        with registered social landlord partners and asking all registered social landlords to
        sign a comprehensive agreement committing them to preventing homelessness.
        There are also examples of co-location and delivery of services.

5.94   It is important to note that issues do remain, however, particularly with '*difficult to
        house*' individuals as pointed out by three authorities. One of these stated that
        although they had some good working relationships, there was no common register,
        adding that the registered social landlords' '*allocation policies have not been
        affected by the Act*'. Further issues were highlighted by another local authority:

> '*Lack of engagement to prevent… increase in court action/evictions over the past
> few months… High payment demands. Pre-tenancy assessment very strict, no
> flexibility on income/expenditure... Demand one week's full rent in advance
> regardless of [whether] HB [housing benefit] payments will be made, undertaking
> "vetting" of applicants' criminal convictions'.*

Local Authority services and multi-agency working

5.95   Eighteen local authorities agreed that the Act has resulted in a stronger emphasis on co-operation between local authority services and multi-agency working, and a further two strongly agree. Only two neutral responses were received and no local authorities disagreed with this statement.

Referral Processes and Supporting People

5.96   Fifteen local authorities indicated that they have a gateway scheme for Supporting People services, with one local authority commenting that they '*will be implementing one soon*'. For all local authorities, this is a centralised referral point for requests for support, which are then allocated to a provider. One authority described how this takes the form of a centralised IT system:

> '*Applications for Supported Housing are completed through agencies placing a referral onto a centralised IT system. The system then matches individuals to suitable schemes and a lead scheme then assesses applicants for accommodation and this then determines the suitability for schemes. As a vacancy arises then applicants are contacted based on the assessment of need*'.

5.97   It was stated that this can take the form of a full-time officer, as in one local authority, where they are based in the Housing Options team. Different stages of development were reported in the gateway schemes, with one authority responding that it '*is in early development stages*'. Another local authority described operating three gateways for access to accommodation and floating support services: (i) the Single Persons Gateway and for families, for the Housing Options Team; (ii) the Floating Support Gateway for the Supporting People team; and (iii) the Young Persons Gateway, which is in a specific building for young people services, operated by Housing Options/Children's Services/a third sector organisation. In addition, they recently opened a gateway for domestic violence.

5.98   With the exception of the authority in the process of developing a gateway scheme, (which it will use for referrals to Supporting People services), all of the local authorities indicated that they have formal referral processes for Supporting People services. The most common way in which these work in practice is through centralised referral systems (reported by 11 local authorities). Referrals are then made to suitable schemes and assessments made. Those who meet criteria are then contacted as vacancies arise.

5.99   Separate routes for referral processes, depending on the services required, were reported by local authorities. In the authority with three gateway schemes, there are referral processes for each of the gateways. Another authority felt that '*The referral process and response times can be inconsistent*'.

5.100   Eighteen local authorities indicated that the homelessness agenda informs the commissioning of Supporting People services. In a number of local authorities this works in practice through Supporting People and housing being part of the same team. This takes varying forms; Supporting People sitting in housing, the Strategic Homelessness function being overseen by the Supporting People Commissioning Manager, or both Supporting People and housing forming one team or part of a wider team such as Community Services (six authorities). Two other local authorities indicated that services are jointly commissioned. The implication is that in all of these local authorities, Supporting People commissioners are informed about the homelessness agenda:

> '*We communicate and share information about service demands and needs in order to ensure we have services that will meet the needs of [our] Authority*'.

5.101   Other local authorities also stated that the homelessness agenda informs the commissioning of Supporting People services through the sharing of information. Statistical information is provided to Supporting People in one local authority, while Supporting People attend homelessness networks in another. In one authority, Supporting People complete need mapping forms with their clients.

Monitoring

Equalities monitoring

5.102   Local authorities were asked which equalities characteristics are captured in the data that they collect. As can be seen in the chart below, the results reveal great variation among the authorities. Significantly, there are no particular characteristics which are monitored by every local authority. Indeed, more than a quarter of local authorities (six) indicated that they do not collect any data on equalities monitoring. This is noteworthy as data on characteristics such as ethnicity and gender are required for the statistical return to the Welsh Government. A further potential limitation is that many people do not provide information on equalities characteristics to the local authorities as it is captured via self-disclosure.

5.103   Some local authorities were keen to point out that they record other characteristics, such as data on carers/parents/guardians, in Welsh or the preferred language. Other local authorities pointed out specific characteristics where they lack data. In one authority, they are not able to approach rough sleepers, while another commented that they '*do not specifically measure the impact of this regarding people from cross border/other LAs* [local authorities]'.

5.104   When it comes to using the data, responses were split about evenly between those that do not use it or are not sure how it is used on the one hand, and local authorities that use it to ensure compliance. In the case of the latter it may be influential through service mapping exercises, tailoring services to meet demand, and the commissioning of services.

Figure 5.10: Equalities characteristics captured in the data (N=22)

Which of the following equalities characteristics are captured in the data?

■Yes ■No

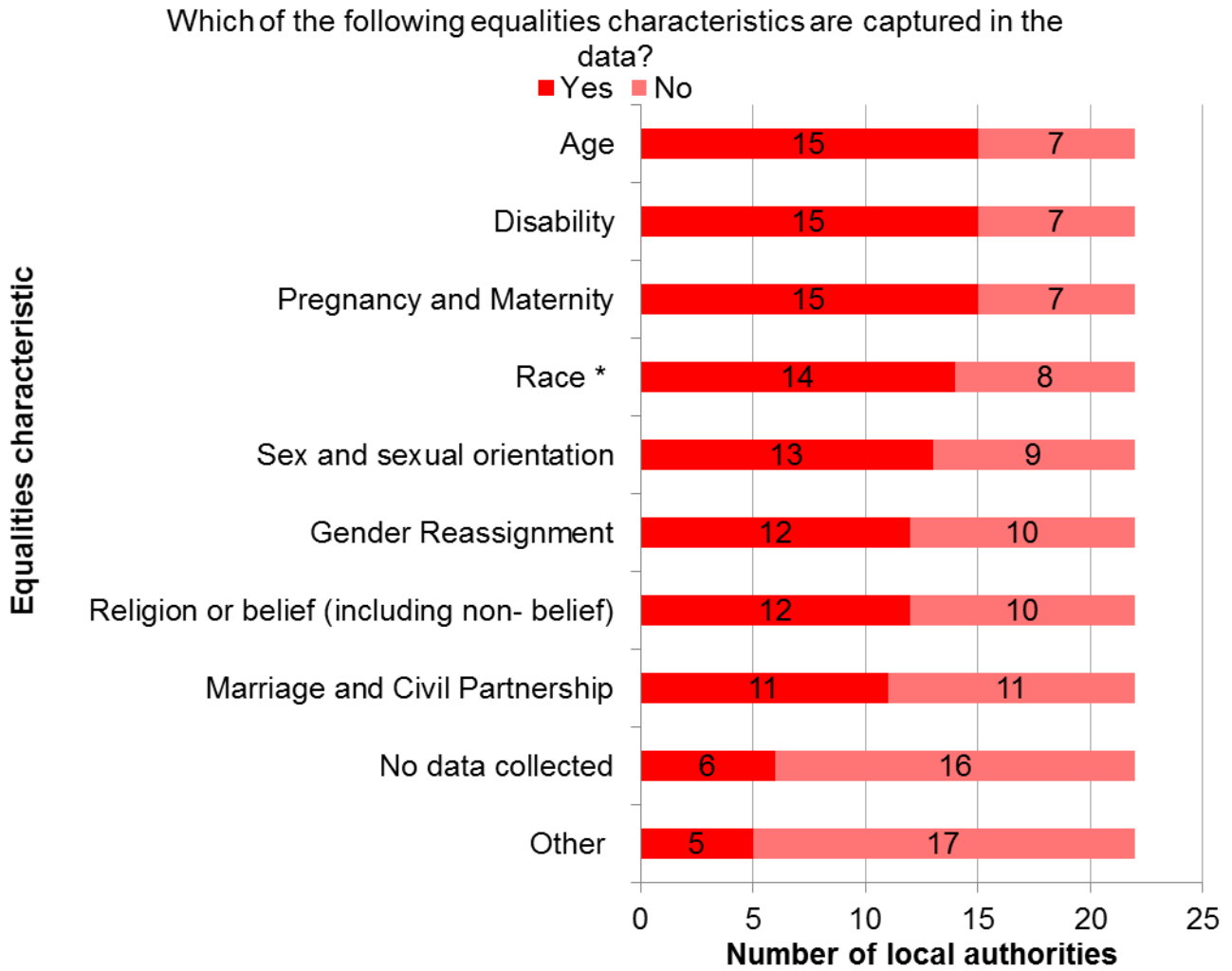| Equalities characteristic	Yes	No
Age	15	7
Disability	15	7
Pregnancy and Maternity	15	7
Race *	14	8
Sex and sexual orientation	13	9
Gender Reassignment	12	10
Religion or belief (including non- belief)	12	10
Marriage and Civil Partnership	11	11
No data collected	6	16
Other	5	17

Number of local authorities

Figure note: Race includes race, colour, and nationality (including citizenship, ethnic or national origins)

5.105   Only a minority of respondents indicated that their local authority undertakes more equalities monitoring since the Act came into effect or that the equalities monitoring is more effective.

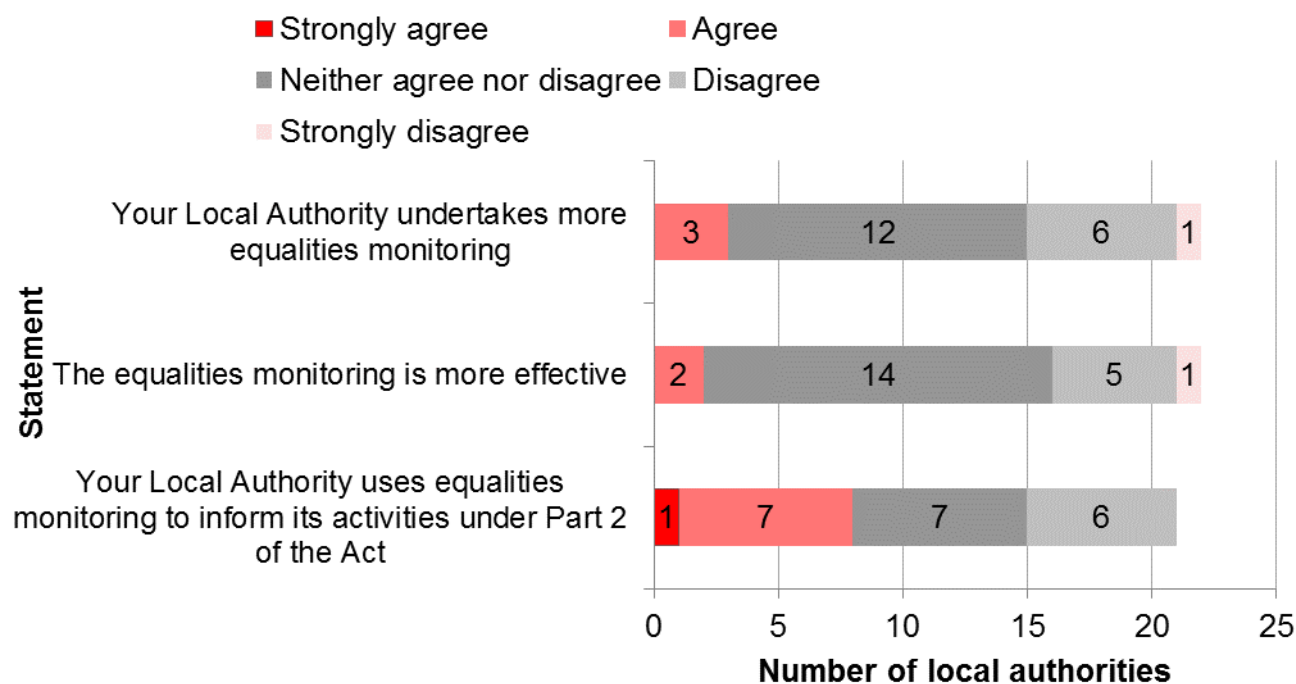**Figure 5.11: Views on equalities monitoring (N=22)**

Figure note: One local authority did not respond to the third statement

Outcomes monitoring

5.106 The majority of local authorities reported that they were able to measure outcomes for people receiving help under the Act through their statistical return to the Welsh Government. One local authority also produced weekly reports to management. Some referred to setting up new IT systems or a database to do so. In one authority, measuring outcomes appeared to be one reason behind a team merger: '*The Supporting People team have now merged with the Housing Options team, to allow for thorough interrogation of all collected data*'. Interestingly, one authority claimed not to measure outcomes unless they are for Supporting People Services.

5.107 Almost all of the local authorities stated that this data is collected quarterly. In one authority, they are '*collected daily and reported quarterly, six monthly and on an annual basis*', while in another, weekly and monthly reports are produced. Local authorities indicated that they used this data for performance measurement and review and commissioning of services.

5.108 An area where less monitoring appears to be taking place concerns withdrawn applications. Only one authority strongly agreed that they have processes in place to follow up withdrawn applications, while four authorities indicated that they agree, six offered neutral responses, nine disagreed, and two strongly disagreed. As such, less appears to be known about those who withdraw, whether they require further support and whether particular equalities characteristics are over represented or not.

5.109 Responses were split between those that analyse the outcomes data by equalities and those that do not. One authority reported undertaking an Equalities Impact Assessment. For other local authorities, the data is analysed only as required, or the data is only analysed at local authority level, not by the housing department. One authority identified this as an area that they are currently seeking to improve. On the whole, it appears as if there is relatively little analysis of outcomes by equalities characteristics.

Local Authorities' Assessment of the Effects of the Act

Demand for homelessness services and how to meet it

5.110 Thirteen local authorities reported increased demand, eight reported similar levels of demand, while one authority was alone in seeing a decrease. Among those local authorities that have reported increased demand for homelessness services, this is due to the preventative duty and people approaching housing services much earlier than before. This has created a shift in the type of work required:

> *'Increase in demand from non-priority clients. Increase in demand for deposits and rent in advance as we are reliant on the private rented sector to relieve homelessness'.*

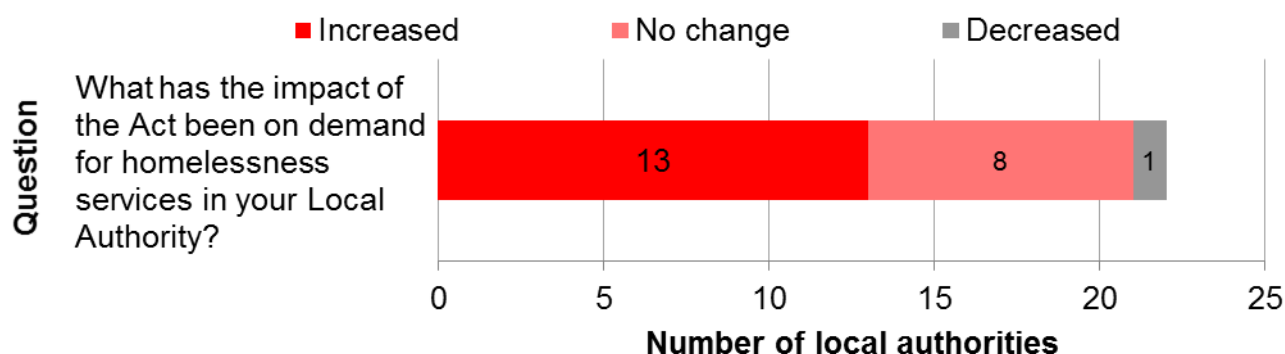**Figure 5.12: Impact of the Act on Demand for Homelessness services**

Figure note: This was an open question. Local authority responses were coded after data collection.

5.111   While local authorities reported that they have previously not recorded preventative work as well as they could have, there is a sense that cases are open for longer, meaning that housing officers' caseloads have increased, and that the partnership approach can be resource-intensive.

5.112   Three local authorities who reported similar demand commented that there was an initial increase but that this has now settled down. One local authority perceived that the increase in preventative work was offset by a reduction in final duty cases. However, the four local authorities who reported an overall similar level of demand also noted increased pressure to do more with each case, cases taking more time and housing officers carrying greater numbers of cases.

5.113   Local authorities that reported similar levels or increased demand noted increased pressures and workloads. However, in the majority of cases, they felt that this has not been matched by an increase in resources (with the exception of Welsh Government transitional funding). Fourteen local authorities disagreed that there has been an increase in resources, two neither agree nor disagree and six agreed.

5.114   Indeed, when asked more specifically about how they had met demand, Transitional Funding from the Welsh Government was the most common source of funding of preventative work, while Supporting People funding has also been used. Along with using funding for preventative work such as rent and deposit payments, local authorities have used it to create positions which can aid this preventative work such as Prisoner Resettlement Officer, Tenancy Support for the private rented sector, a private rented sector development officer (one authority), and environmental health officer and housing benefit officer (one authority). Training these staff has been an additional pressure (one authority). The reliance on transitional funds means that posts may be at risk in future:

> *'Remodelled service to include two posts funded through the transitional monies and one through Supporting People funding. This does mean all three posts are at risk if the funding should disappear'.*

5.115   One local authority outlined how they have used the transitional funding in more sustainable ways in order to restructure services:

> *'Transitional funding has allowed us to restructure our Housing Options Service and create a team whose main focus is on preventing tenancy failure and developing our housing options solutions. The latter is a package of services offered to landlords in the private rented sector to enable us to discharge our duty'.*

5.112   Other local authorities stated that meeting demand for increased prevention has been more about re-deploying staff to more generic or front-end services:

> *'Staff have been re-deployed from the previously resource-intensive temporary accommodation and support back-end of the service to the prevention and relief front-end'.*

> *'Upon implementation of the Act, the staffing structure was reviewed and all existing housing roles became generic, allowing all staff to be able to carry out homelessness assessments and assist with prevention measures'.*

5.113   Another approach outlined in responses was collaboration across local authorities. One authority engaged in a pilot scheme with another local authority where housing solutions and private rented sector teams were merged across the local authorities to increase the staffing levels to manage the increased workload and private rented sector development. However, the joint service will not be continued and the local authorities are currently in the process of splitting the service. A partnership in North Wales between several local authorities involving two regionally funded posts is also well underway. The posts are a Reviewing Officer and one concerned with prison resettlement and implementation of the Prisoner Pathway. According to one local authority, the Reviewing Officer post has met with more initial success:

> *'They have been proactive in reviewing cases where the local authority has been challenged, in providing advice and guidance to Housing Solutions Officers and in training staff on implementing the legislation'.*

5.114   Additionally, efforts to make changes to IT systems to help manage the demand were reported: *'the adoption of an integrated IT system that has reduced the inputting time for caseworkers (only use one database now to record casework)'.*

Another local authority described investing in a new IT system to make case management more efficient. While another has updated its website so that people threatened with homelessness can search for solutions online, installed PCs in the public area of their office and invested in a software package developed by Kirklees MBC '*Let's Help You*' which provides a tenant finding service. According to the authority, the latter initiative has had little success.

Challenges

5.115   When asked to respond to the statement '*Your Local Authority has not faced any significant challenges in implementing the Act from April 2015*', only three local authorities stated that they had not faced significant challenges, and two neither agreed nor disagreed. Eight local authorities strongly disagreed with this statement, while a further nine disagreed, so that a total of 17 local authorities reporting having faced significant challenges.

5.116   Local authorities were asked to outline the top three challenges that they have faced in implementing the Act. The most common response (12) has been categorised as administrative burden and includes paperwork, notification requirements, personal housing plans, and review of case work. Along with increasing workload, it was felt that the administrative effort took away from front-line work supporting customers:

> '*The data sets provided from the outset were not clear enough and [this] has led to issues over how cases were recorded and this added to strain on officers across the board. This could have been better developed in advance of implementation and would have aided caseworkers in their roles and perhaps then resulted in better outcomes for those at risk'.*

*'Not only have we seen an increase in case numbers, but workload on staff has
increased due to the tremendous amount of administration required in terms of
providing various notification letters and personal housing plans. These are very
time consuming to prepare and great caution has to be taken to ensure they are
not open to legal challenges'.*

5.117   Another commonly cited challenge was lack of suitable/affordable accommodation
        (nine). The exact nature of this challenge varies in each local authority, between
        private and social sector housing, or needs for specific types of accommodation:

*'Increased pressure on sourcing properties in the private rented sector to be able
to discharge homelessness duties. There is already a shortage of affordable
housing in the area, both in the social housing sector and private'.*

*'Lack of available housing, particular in the social sector, to enable the Council to
meet its legal duties as defined by Part 2 of the Housing (Wales) Act 2014'.*

5.118   Financial resources, noted in six responses, were another key challenge due to
        increased amounts of work and the shift to a preventative focus; concerns about the
        short-term nature of funding were included in this category:

*'Late confirmation of Transitional Funding amounts which led to delays in ability
to recruit additional staff and confirm priorities for spend'.*

5.119   It was also felt that welfare reform has not helped the financial situation (five
        responses), particularly the upcoming changes to housing benefit for those aged
        under 35 years:

*'Changes associated with Welfare reform have made it difficult to find suitable
solutions for single persons under the age of 35'.*

5.120   Another challenge included in six responses was restructuring or new ways of
        working in order to meet the demand (as discussed above) and associated training:

*'The new legislation and ways of working required staff to acquire a new set of
skills, and to adopt new ways of working/procedures which initially needed to run
alongside the old legislation. There was a requirement to completely retrain staff
and provide support on the changes which was very resource intensive'.*

5.121 When asked to give their views on whether the Act is having an overall positive effect in their local authority for people in need of homelessness assistance, 21 out of 22 local authorities either agreed (13 responses) or strongly agreed (eight responses) that this is the case. The remaining local authority neither agreed nor disagreed.

Summary

5.122 Overall, local authority responses have shown that they are in favour of the changes introduced under the Act, and they believe the legislative changes have had positive effects. At the same time, however, they perceive that demand has increased, cases are open longer and there has been an increase in their administrative burden. Local authorities feel that the preventative approach is working, and there has been no dramatic increase in numbers of people presenting from other local authorities/cross border. No authority has yet changed its position on intentionality, however, and while some are willing to review their approach, others are more cautious about altering the way they currently work or would prefer to maintain their position in future. Looking specifically at stages in the Act, the survey results reveal that:

Information and Advice

- Local authorities think the Act has helped them to improve their information and advice services.
- Almost all local authorities are using personalised housing plans.
- The particular group that appears to have seen the biggest changes to the information and advice services offered to them are people leaving prison or youth detention accommodation (through the Prison Leaver Pathway).

Help to Prevent Homelessness

- There has been no dramatic change in numbers of people presenting from other local authorities/cross border in the vast majority of local authority areas.
- Almost all local authorities feel that there has been an increase in preventative work and are positive about its effectiveness.
- The majority of local authorities engage in some preventative work when the threat of homelessness is greater than 56 days, although the details vary by local authority.

- Less than half of local authorities have changed their application of the vulnerability test under s71. They are collecting more information to establish vulnerability, however, and take updated case law into account.

Help to Secure Accommodation

- There have been much smaller increases in the activities which local authorities perform under help to secure.

- Financial resources are perceived as an issue impacting upon the provision of help to secure services, due to the time-limited nature of Welsh Government Transition Funding and Supporting People Funding, along with reforms to housing benefits.

- Availability of appropriate accommodation is a key issue, particularly for single people. While local authorities can now discharge their duty into the private rented sector, supply has not increased.

- Some local authorities stated that they have seen a reduction in their use of temporary accommodation, which they attribute to their preventative work. Others believe that their use of temporary accommodation is increasing and that this is due to a need for more move-on and one-bed accommodation.

- There has been a significant increase in partnership working with both internal and external partners and agencies.

Duty to Secure Accommodation

- Social housing is still the main way in which most local authorities fulfil their duty to secure accommodation for those in priority need when s73 (duty to help secure accommodation) ends.

- Only five local authorities have disregarded intentionality for some priority need groups. This has been for 16-17 year olds and care leavers. In one case it is for those who have experienced domestic abuse.

- All of the local authorities say that there has been no change to their original position on intentionality. A number of local authorities are engaging with Shelter Cymru on this, however. Some are reviewing their position, while others want more time to see how changes from the Act unfold.

Reviews and Appeals, Code of Guidance and Monitoring

- Although accurate records are not always kept on reviews, one local authority accounts for almost two-thirds of the total (with over half of these being successful).

- Working with Shelter Cymru appears to be reducing the number of reviews and appeals for many local authorities.

- There is clearly room for improvement in equalities monitoring. Not only in the range of characteristics on which data is collected, but also how the data is analysed and checked against outcomes.

- The Code of Guidance has generally been found to be very useful. A notable suggestion has been to include scenarios or case studies to increase the applicability of the guidance.

6. Findings from the First Wave of Service User Interviews

6.1 This chapter presents the findings from service users who were interviewed about their experiences of accessing homelessness services. Interviews took place between November 2016 and February 2017. As indicated in the methodology chapter, 154 interviews were carried out across six case study areas. Of the 154 interviews conducted, the local authority was working to prevent homelessness in 31 cases, and to find housing for those already homeless in 97 cases. Twenty four respondents had recently found housing, however all of those people who had found housing for themselves in the private rented sector remained on the housing waiting list, and felt that their situation remained precarious.

6.2 Respondents were asked a number of questions, the findings of which are reported under the following themes:

- Demographics.
- Factors leading to homelessness.
- Knowledge of how to access homelessness advice and assistance.
- Previous experiences of accessing homelessness services.
- Support needs and service provision.
- Views on homeless services and experiences to date.
- Gaps in service provision.
- Housing aspirations in the next six months.
- Summary of findings.

Demographics

6.3 Of the 154 interviews: 99 respondents were male and 55 female. Although not a representative sample, the preponderance of men reflects the composition of people who presented as homeless or were already receiving support from homelessness services during the time of the fieldwork.

6.4 The majority of respondents (n= 149) were of white ethnic background and a similar number (n= 146) considered themselves to be British (including identifying themselves as English (n= 88) or Welsh (n= 48).
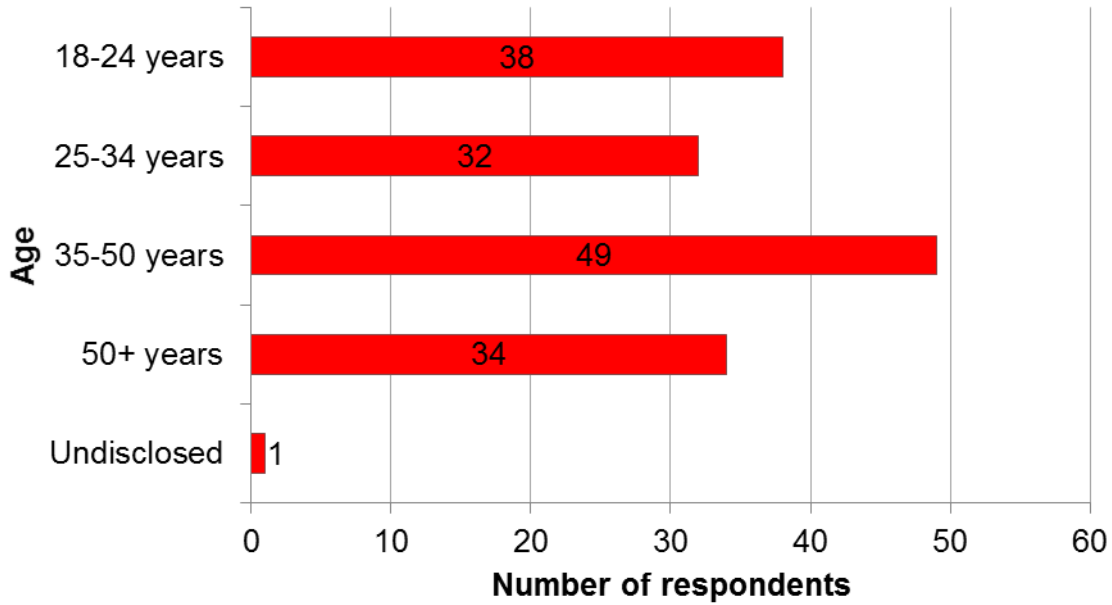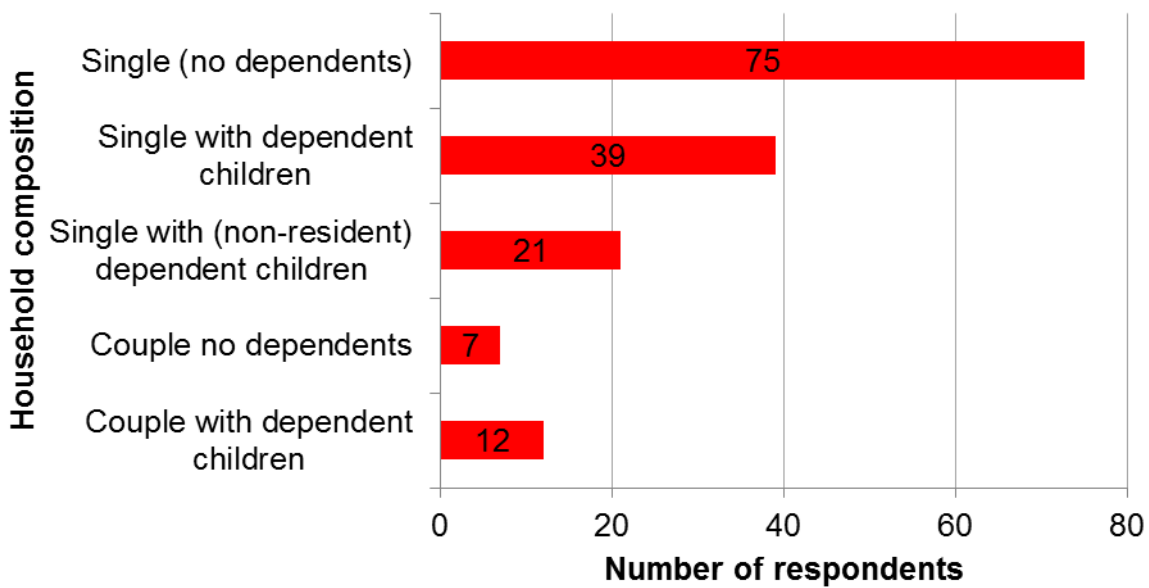
Figure 6.1: Age of respondents


Figure 6.2: Family composition

6.5   Fifty-six service users were ex-offenders, with two currently subject to court proceedings. However, it is important to note that of these, 39 were historical ex-offenders and only 17 people were currently homeless due to their recent release from prison.

Homelessness by area

6.6   In looking at the principal reasons for homelessness across the case study areas, different patterns emerge. The small sample size in each area, however, precludes any statistically significant relationships.

**Figure 6.3: Principal reasons for homelessness across the case study areas**
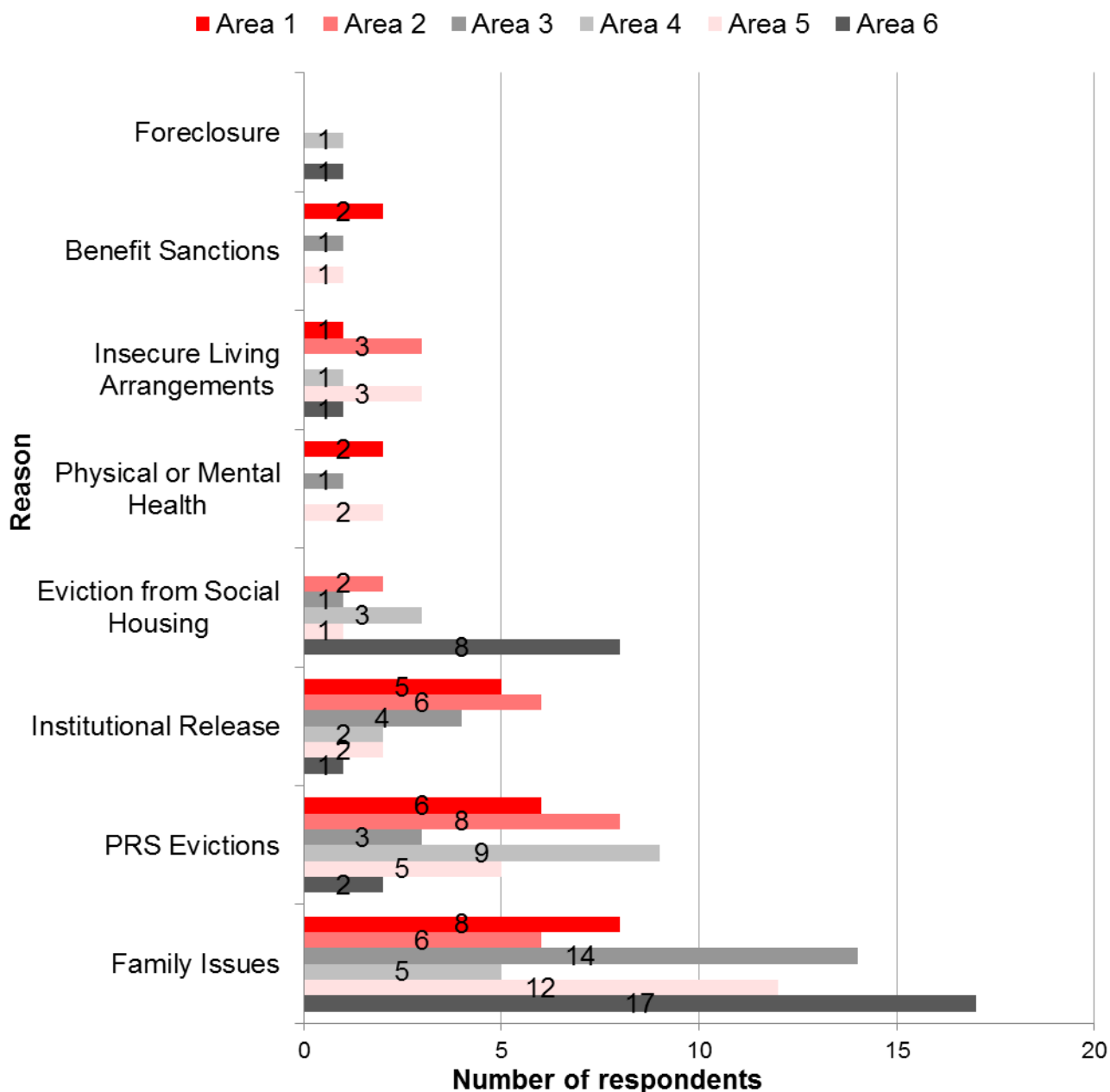
6.7   From these initial results, it becomes clear that while experiencing difficulties with family is a key factor in causing homelessness across the authorities, in certain areas it is second to evictions from private rented housing. This indicates the strong impact of housing market conditions on homelessness; a finding supported by other

studies such as the Homelessness Monitor[15]. It is notable that the numbers of respondents attributing their homelessness to family issues seems to be much higher in areas where evictions from the private rented sector are low. Service users' perceptions of how these factors might be interconnected are something to explore further in the second wave of qualitative interviews. The differences between evictions by social housing providers also signal an important area for further exploration in interviews both with service users and service providers. Given the number of respondents, other variation between the reasons given for homelessness are minimal.

Factors leading to homelessness

6.8   The reasons why respondents were homeless or at risk of homelessness varied considerably. The chart below shows the primary reasons for homelessness across the 154 interviews, although in many cases multiple interacting factors were identified.

Figure 6.4: Reasons leading to individuals facing homelessness (N=154)

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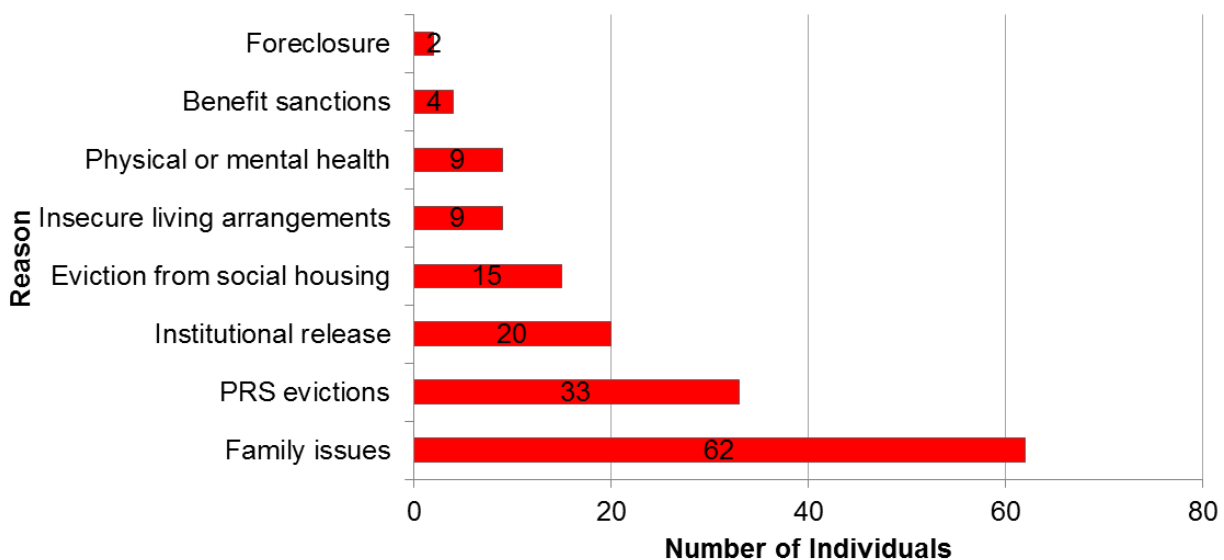
[15] Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2015) *The Homelessness Monitor: Wales* London: Crisis.

6.9   Overall, family issues – or breakdown in family relationships - was the most often mentioned reason for someone becoming homeless. Release from an institutional setting (primarily prison, though these numbers include three respondents from rehabilitation centres) proved to be the second largest difference by gender. Several categories were grouped under 'family issues' including: non-violent breakdown in a romantic relationship; violence and abuse[16]; parental exclusion; breakdown in relationship with children or step-children; and the death of a family member. Men and women experienced these categories somewhat differently, with women distributed fairly evenly across the first three categories. Men were more likely to leave the home at the breakdown of a relationship, and were more likely to be excluded from the home as young people. Men made up five of the 11 respondents who became homeless fleeing violence and abuse (this will be explored further below).

6.10   When looking more closely at the reasons for homelessness by gender differences, several categories appear to have similar numbers of men and women; for example, PRS evictions and evictions from social housing. As noted above, family issues has a greater proportionality of men who experience homelessness as does institutional release.

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[16] This captures anyone who was forced to leave their home due to violence and abuse from a family member.

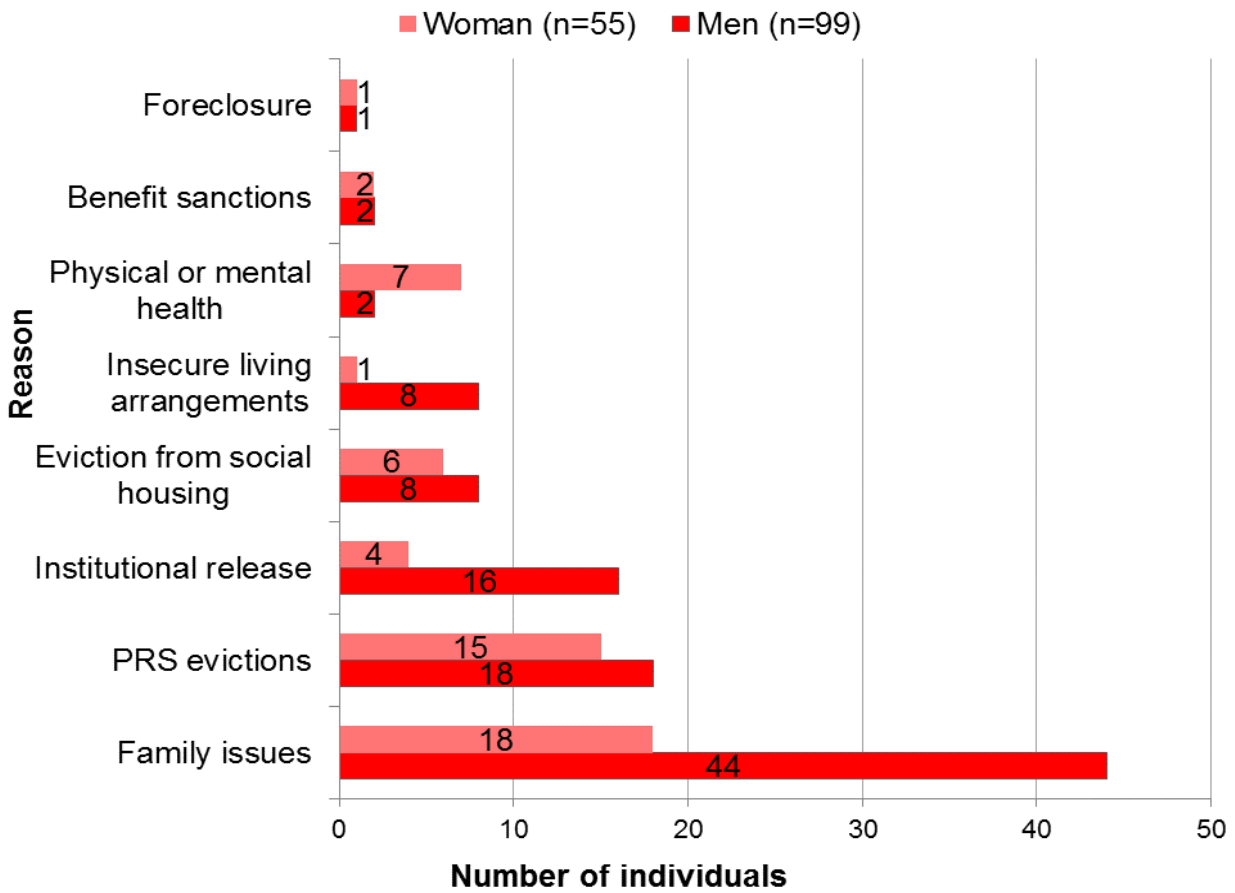**Figure 6.5: Reasons for men and women facing homelessness: n=55**

Legend: ■ Woman (n=55) ■ Men (n=99)

Reason	Woman	Men
Foreclosure	1	1
Benefit sanctions	2	2
Physical or mental health	7	2
Insecure living arrangements	1	8
Eviction from social housing	6	8
Institutional release	4	16
PRS evictions	15	18
Family issues	18	44

X-axis: Number of individuals

Figure 6.6: Breakdown of family issues for men and women

Legend: ■ Women; n=18 ■ Men, n=44

Reason	Women	Men
Breakdown with children/step-children	1	2
Death in the family		3
Violence and abuse	6	5
Parental exclusion	5	14
Breakdown in romantic relationship	6	20

X-axis: Number of respondents
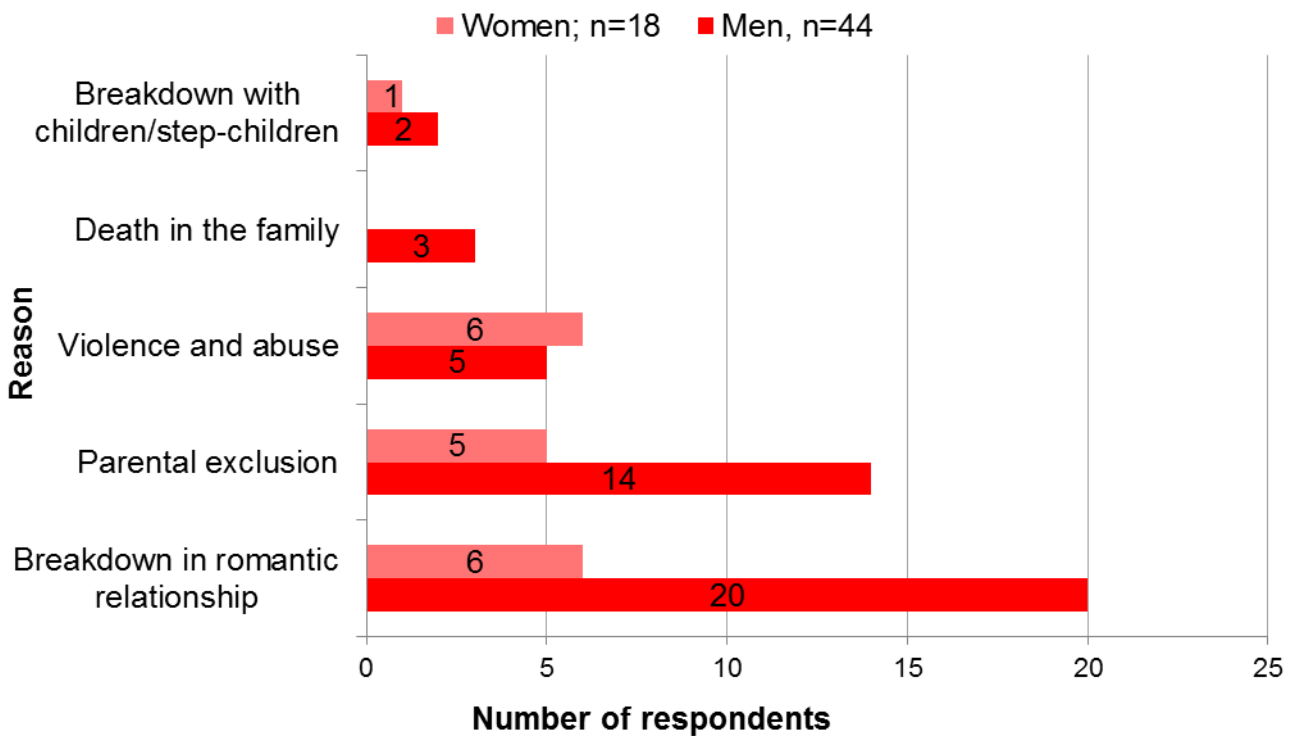
Relationship breakdown and domestic abuse

6.11   The interviews helped to shed light on some of the family issues that had led to respondents seeking help from the local authority. For the majority of respondents, relationship breakdown had not involved domestic violence or abuse, people simply found that they could not live together anymore. As the graphs show above, for heterosexual couples it was usually the man who left the home as the following excerpts illustrate.

> *'It was just a break-up from my wife, marriage breakdown. I ended up on the streets. We were arguing all the time. I said, 'It's not fair to the kids. One of us has got to go and, obviously, it can't be you. It's got to be me,' so I went'.*

6.12   However, this was not true in all cases as illustrated by these female respondents:

> *'I split up with my partner and he had the girls and that, and I ended up on the streets'.*

> *'My partnership broke down … he'd found somebody else and I thought, that's it. I'm out ... I didn't have anywhere to go. I was staying with my friends, on my mum's sofa or floor…I didn't realise there was help out there for me. A [family friend] referred me to [local support organisation] who then referred me to the Housing Options'.*

6.13   Most parents whose children had remained with their ex-partner indicated a need for at least a one to two-bedroom flat to be able to have visits and maintain a relationship with their children.

6.14   Eleven respondents were escaping domestic violence and abuse, with several moving from elsewhere in Wales or the UK to live safely and avoid being found or contacted by their abusive ex-partners:

> *'I fled domestic abuse in [a different local authority] and rented privately...he then found me… so I just up and left that house and came here'.*

6.15   The slight majority of these respondents were women, six in total, with five male survivors. The total of five remains a small, but potentially indicative sample showing the need to consider support for men suffering abuse; this is explored further in looking at how respondents had experienced service provision.

Parental Exclusion

6.16   For younger people, being unable to live with their family was the principal reason for their homelessness. Being excluded from the family home by a parent/s ('parental exclusion') had triggered an approach to the local authority for 19 of 38 respondents under 25 years of age. Of these, 14 were male, and five were female. In the words of one young man:

> 'My mother doesn't want me around anymore… She basically disowned me, it feels like now she don't want me coming back. I've asked her and she's like, "No I don't want you back because you're just hassle and all that". It's like, but that's me, that's my problems, ADHD, it's a nightmare'.

6.17   Some young people had been excluded from the family home several years previously, but had since not managed to access stable accommodation:

> 'I had a big family argument. My mother and father, I haven't really lived with them since I was 15 years of age, always in and out of home or wherever'.

6.18   While some young people had initially reconciled with family, further conflict led to ongoing housing issues:

> 'I first got kicked out of my parent's house and I was living on my own and then I give up my tenancy because I moved back in with my dad but then that didn't work out and I ended up getting kicked out so I couldn't go back to where I was before'.

Issues in the private rented sector

6.19   Of the 154 respondents, 33 were homeless or at risk of homelessness due to issues with accommodation in the private rented sector. Almost exactly half of these occurred when the landlord decided to end the tenancy as seen in the chart below.

Figure 6.7: Reasons for eviction from private rented sector (N=33)
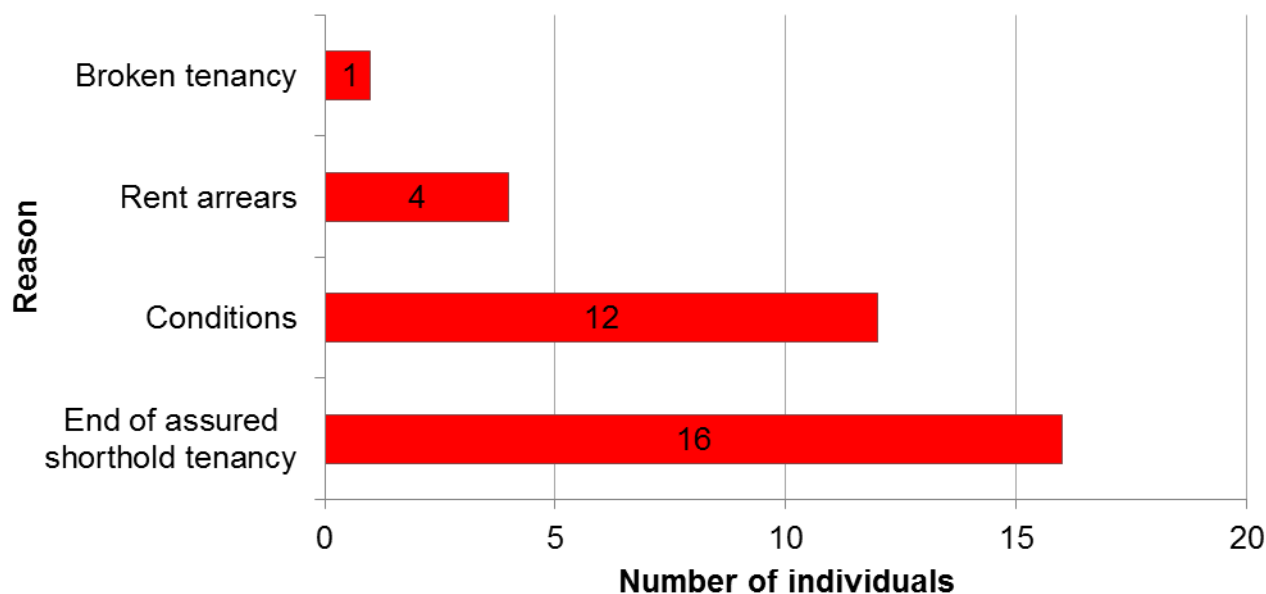
6.20   Nine of the 16 had received an official section 21 notice[17]. The reasons given by landlords for evictions were numerous ranging from landlords refusing to renew a contract, to those wishing to move back into the accommodation, to the two landlords who decided to stop renting their property rather than try to license it under the Rent Smart Wales Scheme.

6.21   A further 12 tenancies had ended or were coming to an end due to poor living conditions. In one case a private landlord was attempting to evict the respondent, an individual who had disabilities. This was due to the amount of repairs needed in the property, and the difficulties in conducting these whilst a disabled tenant was resident:

> *'It's because of the repairs and because some of the repairs that need doing - because I've got disabilities … the floor might have to come up. So, (the landlord is) concerned that if I stay there while that happens, that something is going to happen to me - we haven't got anywhere else to go while those repairs are being done'.*

6.22   Twelve respondents complained of significant issues with property maintenance by private landlords. They reported that this had forced them to look for new accommodation. For one family, uninhabitable conditions included asbestos, damp and the presence of raw sewage. This house had since been declared unfit for habitation. Two respondents felt unsafe not because of the conditions of the

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[17]A Section 21 notice allows a landlord to evict a tenant at the end of their Assured Shorthold Tenancy, whether it is fixed term or month to month. See https://www.gov.uk/evicting-tenants/section-21-and-section-8-notices.

physical building, but due to difficulties living in shared accommodation. This was the only type of accommodation they had been able to access in the private rented sector.

Lack of accommodation upon release from prison/other institutions

6.23   Twenty respondents were homeless following a lack of accommodation upon their release from various institutions. In almost all cases this was prison, however, there were three instances where people had been discharged from rehabilitation centres without having accommodation to go to. For those who were released from prison, most reported not receiving any support in relation to their housing until after their release. One person, who was approaching the council for the first time, illustrated this:

'Well, I got out of prison this morning. I have nowhere to live.'

6.24   Where respondents had been released from prison, their probation officer served as a key figure for many of the men in providing a referral for accommodation.

6.25   Women were slightly more likely to have found support or a direct referral to a hostel while in prison. One woman who was visited by Shelter in prison was able to make contact with the local authority before her release:

'I came from imprisonment, I did. So the hostel was my last option to come home earlier. I was phoning from prison every week, phoning [council staff], '[Council staff] please, please, I need to get home to my son. I need a stable address'.

6.26   Several respondents owed rent arrears and council tax on tenancies which they had left as a result of serving a prison sentence. This made it more difficult to access social housing. One respondent had lost their temporary accommodation due to going into prison and as such had been considered intentionally homeless and ineligible for support upon their release:

'I was in temporary accommodation for about two months, but five months before that, I got in a little bit of trouble with the police. It took them about six months to sort out, to take to court, so I was in the temporary accommodation; I was looking at my last couple of days there. I was in court Tuesday and I was meant to sign for my flat, then, on the Thursday. Of course, I got sentenced on the Tuesday. They classed that I made myself homeless and they won't do anything for me now and since I've come out of prison… I've been homeless, sleeping on the streets'.

Eviction from social housing or hostels

6.27 Fifteen respondents had been evicted/were being evicted from social housing or hostels for a range of reasons. Principally this was for breach of tenancy: mostly due to various forms of anti-social behaviour resulting in complaints from neighbours, disorderly conduct or police incidents. In one particular area, a number of respondents had had personal incidents with the shelter managers:

> *'Basically, I just thought someone was taking [advantage of me]. I kind of lost it in a way, staff asked me to go and sit, calm down…. I ended up going for him and they got between us and they chucked me out and then the police got involved because I was hitting the bins outside, trying to calm me self down'.*

6.28 Three respondents across the different case study areas talked about the difficulties they faced as a result of previous conduct. They felt that their current circumstances were still being affected by past events, despite the fact that they felt that they had reformed:

> *'The last four months I've been trying to get a place off them and, as I said, because of an anti-social behaviour in 2014 they've deemed me an unfit tenant… it was just people coming to my house. I said, there's no anti-social or that it was just friends coming to my house and then they deemed it an anti-social behaviour…. They keep on repeating that; keep on repeating that, you know, I'm an unfit tenant and that, you know, because I got lots. I've been offered do courses with the police and stuff and seems to be no one's taking me seriously'.*

Insecure Living Arrangements

6.29   Nine people were experiencing insecure living arrangements, not due to any kind of crisis as described above, but instead they had not managed to secure stable accommodation. This included people who were sofa-surfing or temporarily occupying a spare room in the home of a friend or family member and finding themselves unable to find secure permanent accommodation.

Cross-cutting Issues

Rent arrears, low incomes and benefit cuts

6.30   Four respondents became homeless due to their inability to pay the rent and the resulting debt, but around 25 had issues with rent arrears in addition to their primary reason for homelessness at the time of the interview. One person owed rent arrears from several years previously, and could find no way to clear them. For them, staying in a hostel was considered a necessary step towards securing their own home:

> 'I've been currently homeless due to rent arrears from years ago. I lived with my brother, I went to work and I was working [for an] agency and I just - sometimes I couldn't pay the rent… and I didn't know the hidden charges they were putting on…I've come back in here because I just woke up one day and realised it's the only way I'm going to get my own home'.

6.31   Another service user became homeless after accruing rent arrears following the introduction of the 'bedroom tax':

> 'It was bedroom tax mostly, because I owed them £1,300 bedroom tax… I had my house for 13 years and then I went in debt with the bedroom tax and they put me on the streets then'.

6.32   Four respondents highlighted the intersection of welfare benefit policies and their homelessness. One person became homeless because of the timing of their benefits payments as these were not always received on the same day, and often after their rent was due, so they were constantly behind with payments. When the lettings agency demanded a fee to change the date rent was due, this person refused and was consequently instructed to vacate the property. In another case, when asked why the family was in the hostel, the young parent stated simply 'I got a job'. This new part-time job meant their housing benefit was removed altogether, and they began struggling to afford to sustain their tenancy. Upon losing that job

they were subsequently sanctioned by the job centre for a full 12 weeks, which ultimately caused them to lose their home. They described the situation just before their eviction:

'I couldn't pay my rent. I worked out I'd have £8 a month after paying the rent. So, the rent arrears built up and they evicted us'.

Mental health issues

6.33   Eight respondents indicated that a severe breakdown in mental health, and for another in their physical health (leading to problems with mental health), had occurred which necessitated them seeking support from homelessness services. Indeed, poor mental health was a common feature for a significant number of respondents as 59 people spoke openly about diagnosed mental health issues for which they were receiving treatment. Of these, five in total had been diagnosed with Post Traumatic Stress Disorder (PTSD). A number of respondents chose not to answer the question about whether they had mental health issues. For several respondents, however, there were intersecting issues as poor mental health was experienced in conjunction with alcohol and substance misuse. The mental health needs of respondents will be discussed in more detail below.

Knowledge of how to access homelessness advice and assistance

6.34   Fifty-two respondents understood how to access homelessness advice and assistance following a referral from other service providers. These included support workers, mental health teams, Shelter Cymru, other third sector organisations, police officers, probation officers and GPs.

Figure 6.8: How people knew where to seek help (N=151)
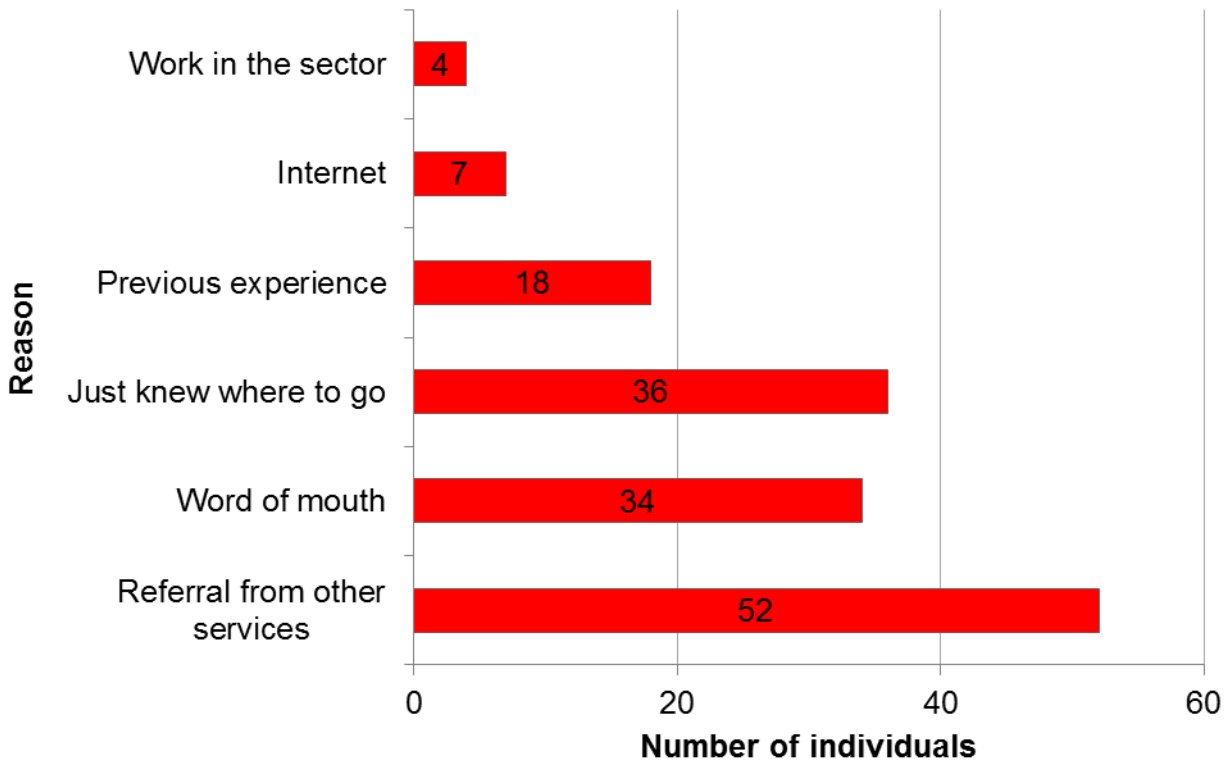
6.35   An evenly split number of respondents 'just knew' to come to the council for help or knew through 'word of mouth' from family, friends, or other people sleeping on the streets.

> *'Well, gosh, it was common knowledge, really, I thought. Having heard so much about councils so I did look up on the internet for numbers et cetera and different departments'.*

6.36   For some service users, however, learning where to go by word of mouth had taken some time. As one respondent explained:

> *'I didn't [know where to go for help], I spent three and a half months in a field…'Basically a friend told me about this, I looked into it then and started referring'.*

6.37   Seven respondents had used the internet to look for where to access help with homelessness, or had asked someone else to do so on their behalf. A few respondents relied on advice from others who had been, or currently were, in a similar situation. Some of these came directly to one of the hostels or had gone to the local authority to ask specifically to be placed in a certain hostel or otherwise try to bypass homelessness services altogether:

> *'Homeless people talk amongst themselves, I just found out off a friend, about [the hostel], yes'.*

> *'I found out about [the hostel] myself, but I asked [the local authority] if I could I come here. They didn't mention it to me'.*

6.38   Three respondents had known where to go for assistance, but reported needing a large amount of perseverance in order to access support from the housing service. One person described the process they followed to reach someone who would help them:

> *'Well really just by going from one place to the other because, like I said, at first, they were no help at all to me. Stop ringing up, I was told I had no chance of getting anything because there's shortage of properties and all this, that and the other, seeing those few empty places but [housing services staff person] and the other people have been helping me have been excellent'.*

6.39   Four people explained that they were familiar with how homelessness services operated due to previous knowledge of such systems. All of these people expressed doubt that others would possess the same levels of awareness, and also added that help was difficult to access. There were also differences between authorities in terms of how people knew where to access homelessness advice and assistance:

Figure 6.9: How people knew where to seek help by authority (N=151)
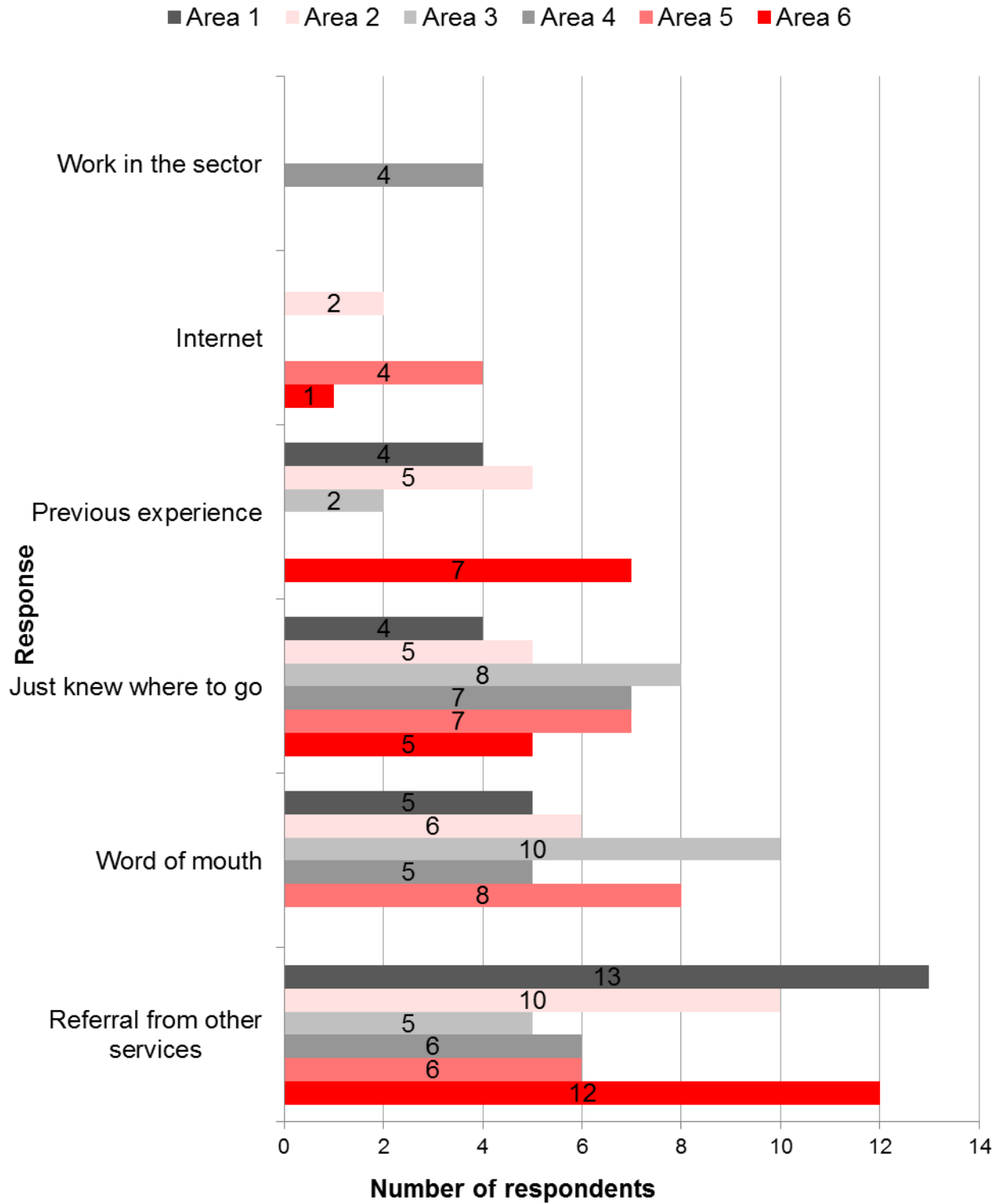
6.40   Responses from the first wave of interviews indicate the significance of referrals to homelessness services in rural areas. Word of mouth as a means of publicising services appeared to be more important in urban areas. It was also evident that people in urban areas had a better understanding of where to turn to for help. Other differences will be more fully explored in the follow-up interviews.

Previous experiences of accessing homelessness services

6.41   Of the 154 respondents, only 54 had previously approached local authority homelessness services. Of those who had approached the local authority, respondents described mixed experiences. Many had found the support they received to be useful, and had received help to access permanent housing. For those who had since lost their accommodation, the reasons were varied and ranged from relationship breakdown to time spent in prison and the accrual of rent arrears. Eight people highlighted some issues with the quality and location of the housing in which they were placed:

> *'The place that they put me in at first wasn't really ideal and a health and safety inspector shut it down… they got me a nicer, better, it's an actual flat but it was only temporary. I was in there for over two years'.*

> *'They helped me with accommodation, [but] it was miles out the way. It was five miles away and I didn't want to live out in a small village, out of town because it would have cost me more to get into [town/city centre] and that'.*

6.42   For those who had both previous experience of accessing services, a small number of respondents stated that their current experience was improved from previous encounters. As one person commented:

> *'Actually, compared to what it was in the past, I mean the last time I was here was maybe two, three years ago, if not longer. It seems very different, more upbeat, better'.*

6.43   For another, the change was that he was now receiving help:

> *'Well, they just wouldn't do nothing last time. They just refused point blank. They were - said I was intentionally homeless because I went in prison'.*

6.44   However, one respondent commented on the challenges they faced as a result of the new emphasis on 'doing everything for himself', and that under the previous system there would have been more support available:

'The last time I had a homelessness experience was right at the beginning of the millennium, so you're talking 2001. At that point, I found that there was real, practical help. I mean, I suffer with learning difficulties and mental health issues, so to find myself in that situation and being fed, 'Yes, you're at risk of homelessness, we want to help you'. In actual fact, what you need to do is do all of the help for yourself, and what you're getting in support is somebody reminding you to help yourself. That is the extent of the support. Whereas in my living memory, there would be more support, and pointing you at housing stock that are put aside, or extra help. I don't feel like I got any extra help. What I got was encouragement to help myself, and I think that's quite a big change since I had to use homelessness centres'.

6.45   Another person who had accessed relief before had seen the level of support decline due to a change in her circumstances. She compared her previous positive experience of being a single mother accessing homeless services and being placed in a hostel, to finding herself homeless a few years later while with a partner and two children, and receiving less support:

'It was because I think I was on my own, I was a single mum, I wasn't working, so I got all the help. When we came back this time it was me and my partner. We were both working and they seemed to think we should be able to afford our own private rent, for a three-bedroomed property, and we couldn't. But if I was single and on my own I would have been given the three-bed rate housing benefit, I would have been given more support'.

6.46   Some of the younger people who had been looked after by their local authority, or in foster care, or who had experienced homelessness previously, suggested a 'revolving door' in terms of repeated periods of living in hostel accommodation. One young person commented that:

'Yes, I was in the [care home] … but that was back when I was 18 and I was actually running away from the care homes up there and all that, so I've got ties around here. … Basically, I've been homeless most of my life.'

6.47   Another respondent described his experience as a teenager, and the lack of support received then. Eight years on he was back in a hostel:

'I remember when I was kicked out at 16 … five of us been kicked out, I went like this and they said, "you don't look homeless and we don't have a duty of care to you" which is wrong. It feels like they're only helping people who've got mental health [issues] or have been in prison. It's wrong...I was 16. I went to the social services with my mother and father and the social services said basically to my father that he's the reason that I'm like this. I went to live back with him, I got kicked out again which was permanent, and I was just past 17, nearly 18, and they wouldn't do nothing for me. Me and my brother were camping in a tent on a farm. Yes, so it's a horrible life'.

6.48   One hundred service users responded with a simple 'no' when asked if they had approached the local authority before. For one or two in each area, this question elicited further responses that served to highlight the impact of them becoming homeless, but also in relation to the difficulties people felt in having to ask for help. For some it was because they had always been able to support themselves:

'No, we've always worked, we've always done - but no, it's just soul-destroying though'.

6.49   For others, it was simply not knowing anything about what would happen, in the words of another service user:

'Support, no not before, no, first time so it's very scary'.

6.50   Clearly, the majority of respondents had not accessed support before and the experiences illustrated here were both positive and negative.

Support needs and local authority service provision

6.51 The responses to the question about support needs were often guarded, or respondents wished to keep private the exact nature of the problems they were facing. Of the 99 respondents who felt comfortable talking openly about the other kinds of support they were receiving, most reported that these were being provided by other services. The principal need was in the area of mental health, with 59 respondents describing this as an issue. Their support included counselling, interventions from psychiatric nurses and mental health support teams. It seemed evident to the study team conducting the fieldwork that mental illness is an issue for a greater number of respondents than those who indicated this to be the case as several people exhibited signs of poor mental health. Support for managing physical ill health was also a significant issue for service users, as was help with benefits. These are shown in the graph below as percentages of the total number of respondents.

Figure 6.10: Percentage of respondents explicitly stating primary support needs
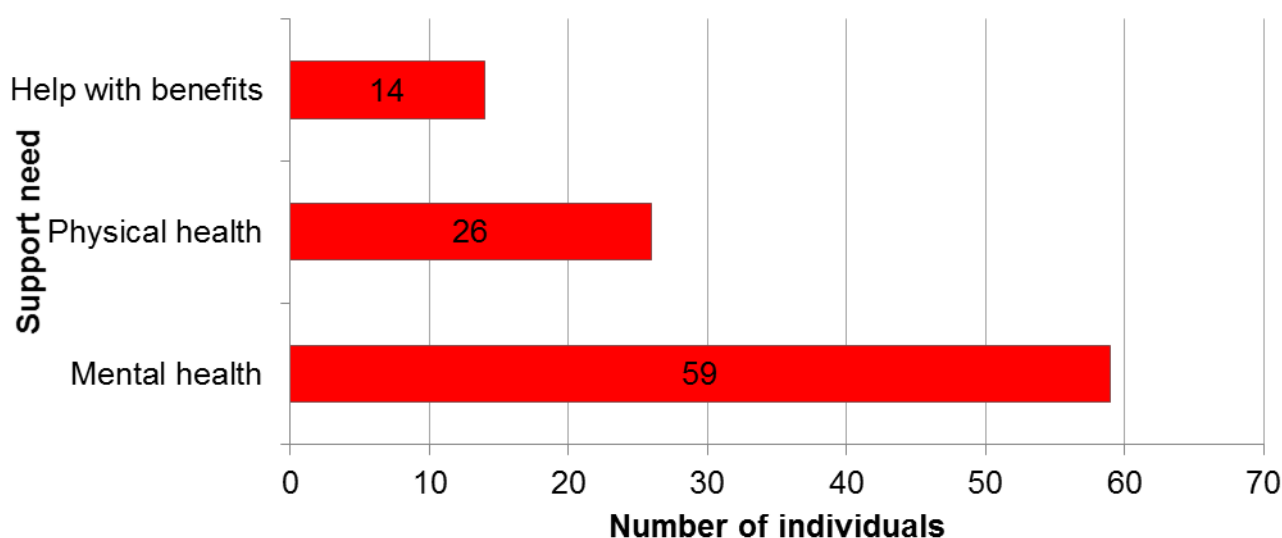
6.52 For six respondents, a very high level of support in learning basic skills or dealing with everyday life was required. For example, some people required help with managing a bank account, paying bills, and learning how to cook. One respondent reported how their support worker had accompanied them to all of the banks in town in an attempt to establish how bills could be paid without proof of address. One or two respondents in each area described continuing problems with alcohol or drugs. For some areas this was slightly higher, while four people reported problems with gambling. Other identified support needs included respondent's physical health and disability, help accessing benefits, help obtaining food, help with debt, and help with court proceedings.

Mental Health support

6.53   Those with the most severe mental health conditions, such as Post Traumatic Stress Disorder (PTSD), often appeared to be accessing formal and specialised support. Some people indicated that they were managing their condition and the majority appeared knowledgeable about the kind of support they needed. Five respondents across the different areas had been diagnosed with PTSD, two of them ex-servicemen. One of these noted how hard it was to get adequate support:

'To be honest, I mean I'm getting into a better place than I was, because I used to suffer with post-traumatic stress disorder and I've had to contact various forces charities because the NHS aren't available to provide the support that I needed for it… So, yes. I mean the other thing obviously that a lot of people aren't aware of is the Armed Forces Covenant as well which, to be fair, the lady that dealt with me, she did mention but I don't think a lot of the people who work for the councils are actually aware of it and if they are aware of it, what it actually means. So, I think that's a bit of education for them'.

6.54   However, this person did not think that it would be possible to access support from the NHS without a fixed abode:

'I don't have an address as such…You can't register with a GP without an address'.

6.55   Another service user similarly reported the negative impact their situation had on their mental health before they found accommodation:

'It really affected me, anxiety-wise and everything. I was on a lot of medication during that time'.

6.56   Six respondents reported that they were receiving no support for a mental health condition.

6.57   Other people described the need for increased sensitivity to the levels of support people needed, particularly around mental health issues. This was framed in relation to the benefits of having a support worker in terms of enabling some form of progress, as one respondent commented:

'I think when you're on your own, you don't seem to get anywhere but when you do have the support worker with you, you do'.

6.58   Whilst this respondent alluded to an 'enabler', others spoke about 'barriers' as several people experiencing mental or physical health conditions often said these were not sufficiently taken into account by local authority homelessness staff. One respondent stated that staff did not appear to be satisfied with a diagnosis and prescription as they wanted more detailed explanation. Another person reported struggling with instructions to gather evidence requested by local authority staff, due to their condition:

> *'There's not really any support around, because some people do have mental health issues and do struggle doing certain things, you know?'*

6.59   Seven respondents expressed concern for other more vulnerable homeless people, indicating the difficulties people with mental health issues might have to confront:

> *'I was very, very lucky in that I wasable to sort myself out. I mean, I travelled 20 miles from where I was living, and I ended up doubling the amount of rent I was, basically, paying to the landlord, but I sorted that out for myself. If I'd not been capable, I could have been rough sleeping. I mean, at the end of the day, the root cause is housing stock, but also, I think, the councils are cutting their services, and there's less and less time available for people with problems. … I just hope people aren't slipping through the gap. If somebody was less capable than me, somebody wouldn't be able to help themselves'.*

Physical Health support

6.60   This was the second largest support need indicated across all case study areas, with 34 people from each area suffering from a long-term health condition requiring specialist care: for example, seizures, strokes and physical disabilities.

6.61   Five service users described the difficulty in maintaining care and regularly taking medication while in a hostel or sleeping rough:

'[I take] 18 pills every morning. I go down [to the chemist] for them, I've had to go down for them because they get pinched out of me bag in the night shelter because they're all heroin users or drug users, different drugs or drink or whatever. I go for them every morning now and I've had money pinched out of me bag there'.

Help accessing benefits

6.62   Twenty-two people reported receiving support to access benefits and in helping them to identify what they were eligible for. A few of these stated that this support had been difficult to access and hard to understand in terms of the benefits framework and their own eligibility. One respondent said they still did not know what kind of support they needed or were eligible for:

'I don't know [what's happening], to be fair. I haven't got a clue.'

6.63   Another respondent in a similar situation reported feeling relieved by the fact that their (local authority) hostel key worker was able to help them navigate the bureaucracy, as they had not encountered it before:

'This is all new to me, like the council, signing on is new to me. I've never done all this stuff before. …. I don't know none of that. I don't know what I'm entitled to with the benefits system but thankfully, my key worker…she's managed to get it all up and running for me.'

Support to maintain caring responsibilities

6.64   While this was not a support need that respondents identified directly, 51 people across the case study areas either had resident dependent children for whom they were the main caregiver, or they had other family dependents:

'I want to live locally because my sister's disabled. I look after my sister… [my] daughter lives local as well'.

6.65   Most service users expressed the wish to be housed in the same areas they had lived in previously because they needed to stay close to extended family in order to continue to fulfil their caring responsibilities.

6.66 For those without direct caring responsibilities, 21 respondents, who were classed as single, were parents who had either had children removed by the local authority in which they lived or who had left the children with a partner following the breakdown of their relationship. For this group, housing was the most urgent of their problems and needed resolving before they could exercise their responsibilities as parents. This feeling was summarised by one respondent:

'[A]t the moment I just need somewhere I can call my own so then I can work towards obviously getting myself another job and then, like I said, work towards actually having some type of visitation to my son, but obviously if I haven't got a place of my own I haven't got a leg to stand on, have I?'

6.67 In this short preliminary interview, not everyone chose to disclose details about the particular challenges they faced and the support needed to overcome them, and details were often brief. For those who did answer, mental health was the primary issue, and 59 of the entire cohort surveyed were receiving some kind of intervention. Issues of physical health were the next key support need, and finally support with benefits.

Views on homeless services and experiences to date

6.68 Given the low number of walk-in presentations in most of the case study areas, many people interviewed, 97 in total had been working with homeless services for some time. The responses to this question were therefore more detailed than initially expected. Service users were broadly very positive about the help they had received across the case study areas, and what they reported finding most helpful in creating a positive experience were also what created a negative experience when absent. Good communication (particularly when face-to-face); receiving multiple kinds of support, and rapid responses to issues were identified as being positive. A total of 93 service users indicated that they felt supported by the housing service, 49 said that they did not feel supported and the remainder, 12 people, were unsure, did not yet know or refused to answer. In the words of one respondent who felt supported by the local authority:

'Oh yes, my life's changed completely in a few weeks'.

**Figure 6.11: Feeling of support by area**
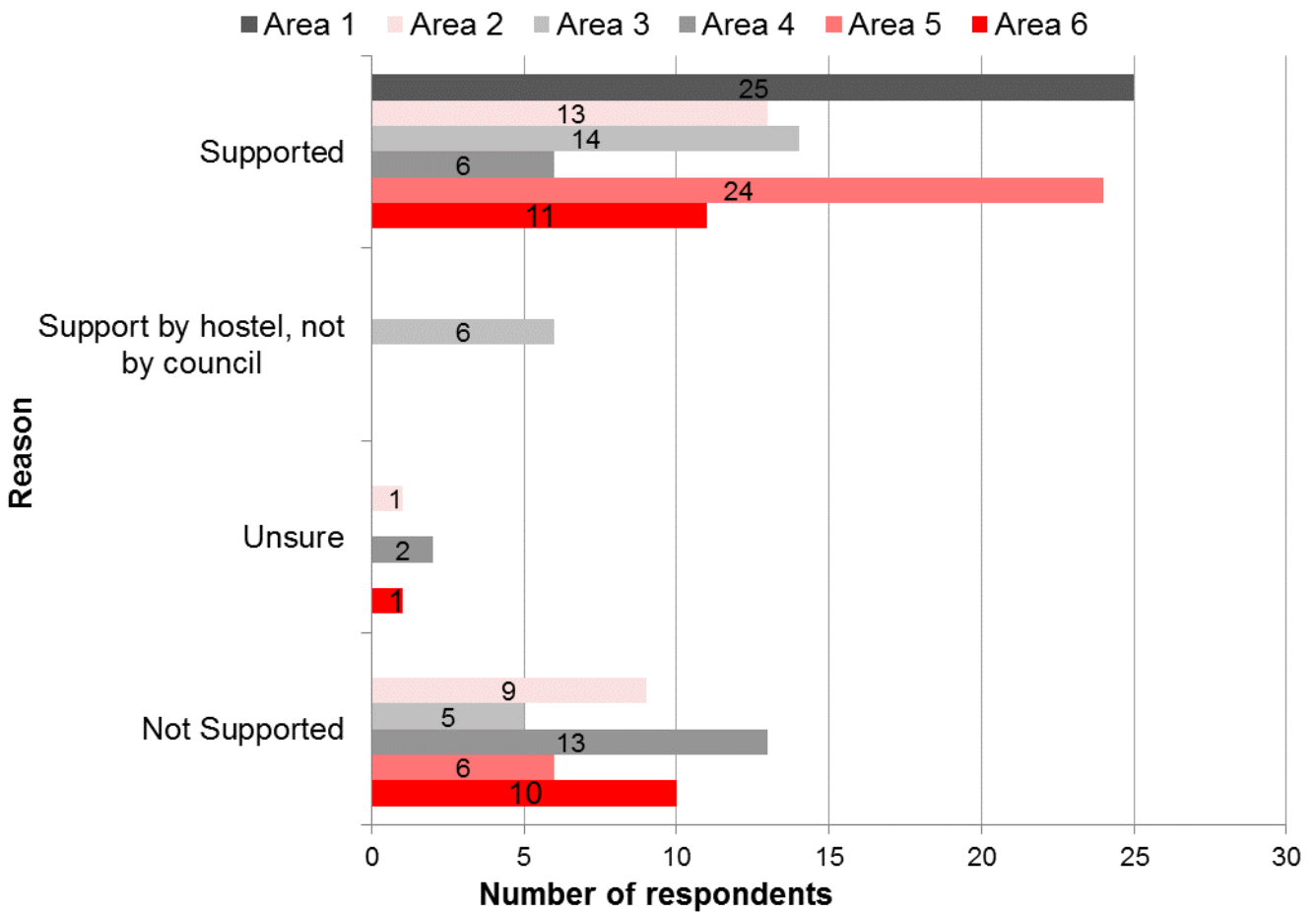
The extent to which local authority understands individual circumstances and how to help

6.69   When asked about whether they thought the local authority understood their situation and were able to help, responses were mixed over the whole cohort. Seventy-nine people responded yes on both counts, but 24 stated that while the local authority understood their situation, when it came to actually providing longterm accommodation that they were unable to help. Most service users attributed this to a lack of social housing, problems with private rented sector and high rental costs. An additional nine respondents said it depended on whom they spoke to in the local authority. In other words, staff could potentially act as barriers or enablers to accessing accommodation:

> *'I think it does depend who you talk to, I've spoken to people on the phone that are really willing to help, and then there's other people that are like, 'Well sorry, that's the way it is.' It's in black and white on the paper and it doesn't matter about your personal situation or needs'.*

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Figure 6.12: Does the local authority understand the situation, and how they can then help? (N=154)
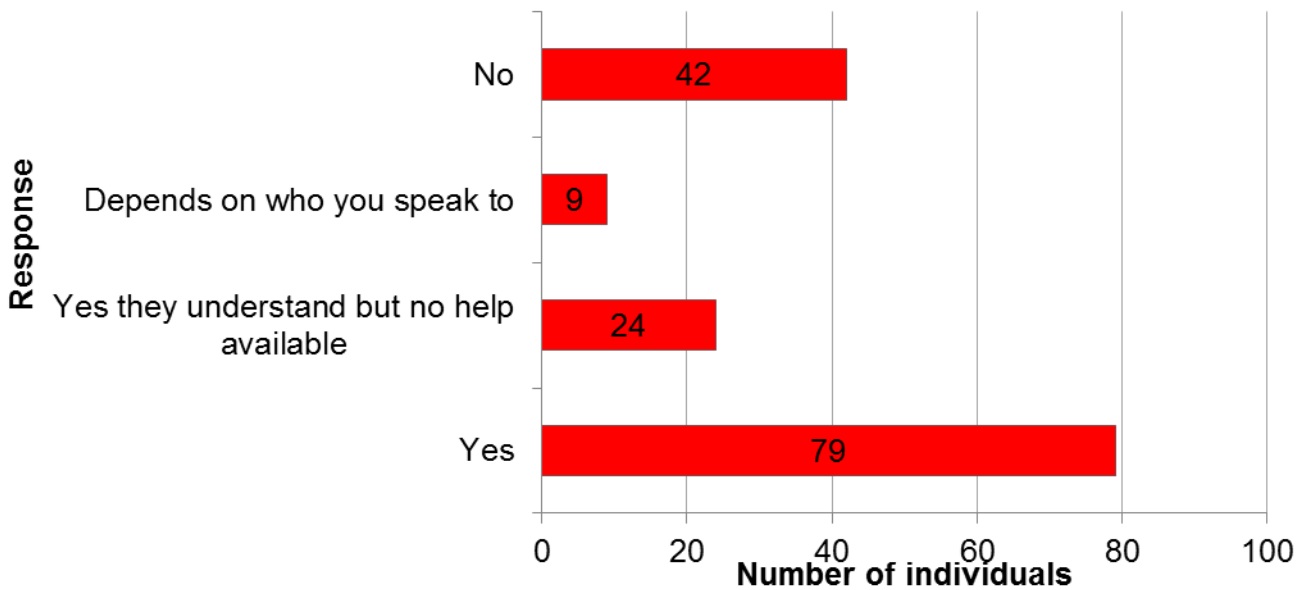
6.70　Nine respondents said they did not yet know if the local authority understood their situation, and 42 responded emphatically that they did not believe this to be the case. The responses are explored in more detail below but, overall, empathy (or the lack of it) proved to be the principal ground for believing the local authority did or did not understand someone's position. Of the 42 negative responses, 33 were for a perceived lack of empathy, with an additional two respondents attributing this lack of empathy to specific people who had known them for a long period of time. Six people spoke explicitly about the local authority's lack of understanding of the difficulties people encountered in the private sector, and this was a more common concern expressed by many other respondents. This connected directly to the ability of staff to communicate effectively with service users and to provide even low-levels of immediate support, which also had great impact on people's satisfaction with services.

> 'She is the only person that actually sat down and listened to what I had to say. Nobody else was interested, they didn't want to know. Anyway, she told me the right way of going about things and advised me on what to do next'.

6.71   While respondents stated that individual staff members understood their situation and how to help them, they expressed frustration at the lack of housing options available to them. This was attributed to the limited supply of social housing and an inability to access housing through the private rented sector (either through affordability concerns or their exclusion by landlords on the basis of their status as welfare benefit claimants):

> 'She understands completely. I think their hands are tied with what they can do. That's not them, that's further up, isn't it?...It's lack of housing. It's lack of council housing, social housing, there's just no social housing around compared to how it used to be. It's appalling. It's disgraceful'.

6.72   The vast majority of those interviewed indicated they felt treated with dignity and respect by local authority staff:

> 'Dignity and respect, yes. They haven't judged you, have they, they've just got you a house and just left you to it'.

> 'Yes, from day one when I walked in because I was dreading it but it's been nothing [like] what I thought [it would be]'.

Accessing homeless services

6.73   In a number of cases, particularly for the 24 people who said that the local authority understood their situation but that there was not much they could to help them, they still appreciated how helpful and respectful staff were. This was evidenced by them being able to access appropriate support while waiting for their housing situation to be resolved:

> 'They have been really helpful but I just think it's hard because it's no time frame, that's the only issue'.

6.74   Above all, people expressed a desire to be listened to, and for some action to be taken on their cases. One respondent neatly summarises this:

> '[Housing Options Officer] has been absolutely fantastic. She's done everything that I needed to go through, and more, to be honest with you, so really, really good…She's done a referral now to the private housing sector, so that they can come out and assess the flat to see if it is fit for a human being, but she's also like listed absolutely everything. She sat and took the time to listen to what my concerns were, so she's done a really, really good job; really good job'.

Empathy

6.75   Thirteen respondents talked about the importance of feeling that they were not alone in dealing with the problem:

> *'[I]t was nice to know that somebody else was looking, as well as not just me but also it helped me emotionally as well. It gave me a boost … I felt tremendously supported and it was nice to know that there was sort of, how can I put it? Somebody in my camp helping me to find somewhere'.*

6.76   Eight respondents reported very positive experiences of accessing services and attributed this to local authority housing staff who took the time to listen to them:

> *'I just feel supported because they took my situation seriously and basically they helped me get this place and it's nice for now like'.*

> *'It was quite an easy process. I was dreading it. When I was filling the form in I came over nervous but they made it so easy and it was fine'.*

Communication

6.77   Although there was considerable variation in people's'individual circumstances, the need for regular communication was highlighted as being key to satisfaction with services. As could be expected, respondents expressed frustration with the service they received when empathy, face-to-face contact, timely and regular communication were not present. For the 50 or so respondents who said that the local authority did not understand their situation, there were a number of recurring themes as to why. These included: lack of face-to-face contact; lack of empathy and good communication; a lack of understanding of difficulties in private rented sector; and prejudice caused by previous personal knowledge of the respondent. These are considered in greater detail below.

6.78   In general, respondents reported feeling most confident when staff made efforts to ensure that the process itself did not further contribute to their anxiety. One respondent commented:

> *'It's brilliant, absolutely brilliant. I couldn't ask for any more…. I don't have to ask anything, they tell me before because they know that I fret quite a lot. I'm quite a worrier. I'm anxious all the time so they know this so, obviously, they keep me informed'.*

6.79   In rural areas in particular, people were very positive about those authorities where staff came out to visit them, as many people talked about the difficulties in travelling to the local authority office. For some it was the severity of their health issues or childcare responsibilities which made this difficult.

6.80   In addition, given the prevalence of mental health issues among the people interviewed, both communication and a wide understanding of support needs and available resources seemed particularly important in helping people to achieve housing stability. For many people, an existing condition such as depression or anxiety had been a contributing factor to their homelessness, but a number of others had experienced mental illness and distress as a result of being homeless.

Lack of face-to-face contact

6.81   The need for face-to-face contact was raised by 15 people in relation to gaps in support. This particularly affected service users in rural areas where the presence of Housing Options offices had been discontinued. Many respondents said that they did not feel that they had the staff member's full attention while communicating by phone:

> *'It would be nice to have somebody you can speak to face-to-face, not over the other end of the phone…When you're face-to-face, I think you don't get as frustrated as you do when you're on the phone because if you're trying to put your point across on the phone and basically they're doing other things as well while they're talking to you, it does frustrate you but when you're face-to-face then, they've got to concentrate on you…. Sometimes you don't know what they're doing, they could be reading up about something else when they're trying to talk to you on the phone'.*

Lack of empathy

6.82 For 20 respondents, even where there was face-to-face contact they reported a lack of any real support or empathy. One respondent commented:

'It's like them not getting to know your situation. It's just read, pass on…I got given a piece of paper, not told what it was about. I got told I had to sign it and they tried saying I had to pay my bond and the first month's rent and I was on nil income. Just the housing benefit - trying to get the housing benefit in... just told me I need to sign it otherwise I wouldn't be able to get the property. I'm up here showing my support worker … and she said that's totally wrong, got straight on to the phone with them and within half an hour it was sorted'.

6.83 This view was echoed by other respondents:

'I think empathy would have been massive definitely. I'm not saying that I needed him to be like, 'Oh …give us a cuddle' but like 'Oh yes I can understand. This is going to be hard but you're making a move, you're making a step' do you know what I mean? It's just some positivity'.

6.84 Eighteen respondents complained about the long waiting times when attending Housing Options. Whilst reducing this would be ideal, respondents were pragmatic but felt that the waiting area could be made more comfortable, especially where they were accompanied by young children:

'There could be some sort of thing there to keep the kids occupied but there's nothing up there for the kids'.

6.85 The small number of people (eight in total) responding negatively tended to be clustered in two of the case study areas. One such respondent said they felt that the housing service 'looked down' on people facing homelessness:

'They look down at you. They belittle you a little bit… It's like you're a begging, begging for something, please. It's like that, yes. You feel less of a person'.

6.86   Another respondent described a similar experience:

'I didn't feel any empathy or compassion and there were just little things like when I spoke to the gentleman and he was reading his notes on the computer. I work for a living and I know about customer service and body language and just manners in general. He wouldn't look me in the eye and I had to sit there and the guy was just reading the notes. You know when you're feeling at your lowest point and someone can't even look you in the eye? You're extra sensitive than you usually will be, so you take those little things to heart than you would do'.

6.87   One respondent related previous experiences with homeless services that flagged up some of the issues around information sharing, and how this led to one of the ways she had felt disrespected by other authorities:

'I just found they want to know the background but I think the amount of people that you do open to it's not even confidential then. It's like it's all out in the open and it's like, 'Oh my God', do you know what I mean? So it's like they don't give you so much respect and I think that's because, I feel like they look at me and they go, 'Oh my God, she's homeless. I don't want to look at a person like that'.'

6.88   The centrality of empathy in terms of ensuring a person-centred approach is evident here. Indeed respondents who spoke about the lack of empathy that they had experienced additionally described a distinct lack of warmth and appreciation of the difficult circumstances that they had found themselves in. This appeared to result in people feeling judged and, in some circumstances, degraded.

6.89   One respondent summarised what he expected from the housing services, alluding to his previous experiences of not receiving empathy from local authority homelessness services:

'Toddle on. Find a doorway and I keep moving. It's the only way you can live round here'.

6.90   The absence of face-to-face communication was a central reason people found services to be frustrating rather than useful, hindering open communication. One respondent, for example, stated that the local authority did not appreciate the severity of their situation, and emphasised the need for more responsiveness and more reassurance about the process:

> *'I don't think they realise how difficult it is for people, especially with this two-week wait thing. I don't think there's enough support in the middle of it. Nobody said, 'If you've got any concerns, ring me back and I will do my best,' or, 'Ring me back and I'll see what advice I can offer you in the meantime'.*

6.91   This sentiment was shared by 35 of those interviewed, all of whom said they felt great anxiety throughout the process. Deep frustrations with the slowness of the process and the uncertainty throughout surfaced in a small majority of the interviews, emphasising the need for regular communication and support. Several respondents indicated that they felt that local authorities were 'doing what they could', but it did not help to speed things up.

6.92   One respondent suggested that a mixture of face-to-face and on the phone support would be better, with flexibility for individual people to decide which is best for them. Another noted that having face-to-face appointments available in their town just once a week would improve the service.

Women's experiences

6.93   Three women talked explicitly about feeling concerned for their safety due to their gender, and expressed frustration at being placed in hostels where they felt unsafe. One woman was concerned about the suitability and safety of mixed hostel accommodation for women in general:

> *'I don't think women in general should be put onto floor space, because it's quite a manly sort of world, homelessness in general... it is a violent sort of world, you know? Dangerous world, if you like. I just think there's a safety aspect…. I know people are all for equality, but….I wouldn't feel comfortable being with a load of men camped out on the floor… I don't think they understand that at all'.*

6.94   Sensitivity to domestic abuse was raised as another potential issue, though it affected a small group split across the areas. Another female respondent, who had experienced domestic abuse, explained how she felt that local authority staff had not been sympathetic to her refusal to return to her flat:

> 'It was like it was my fault that I've left the flat and made myself homeless…I'd given up a really nice flat but I tried going back and there were just too many memories. I just broke down. Every time I went in there I was like, 'I can't live there.'… And when he comes out of prison, even though I've got an injunction against him for three years, he knows the area'.

6.95   In these instances, both respondents illustrate the particular risks to women, albeit in different circumstances, where safety has not been considered within the policy and practice of local authority services. This is also highlighted below in relation to hostel accommodation.

Lack of understanding of difficulties in the private rented sector

6.96   A number of respondents stated that the local authority did not understand the impact that high rent costs in the private rented sector was having on families. Six spoke about this explicitly, but it was also a theme among the 24 respondents sceptical of the local authority's ability to support them. Almost all of these people talked about the lack of social housing and the broader shortage in housing as part of their response. A number of respondents said that they were being forced into properties they could not afford, and once they were given accommodation they were no longer supported. As one respondent commented:

> 'I have seen nothing of them. Literally, since I got my house, I haven't heard anything…I have actually got a meeting on Friday [with a charity] about the tenancy, because I can't afford it]'.

6.97   This was also a considerable issue for older people who had a fixed income, and were unable to afford private rented accommodation on their own. In addition to rent levels, respondents expressed great concern about security of tenure and the power of landlords over living conditions:

> 'I'd feel more secure if it was a council house or through a housing association but I'm fully aware of the situation and how hard it is…. I would feel it would be a more secure housing situation because the problem with private is they can do what they want, basically'.

6.98 Others talked about the lack of security and stability in the private rented sector and their preference for social housing as it is possible to have longer more sustainable tenancies and avoid repeated homelessness:

'Yes, stability. I think that's the problem, they're pushing everyone into private rent but they're not seeing that everyone's going to be back here in six months possibly doing this again.'

Prejudice resulting from previous personal knowledge

6.99 Seven respondents across all areas described the difficulties of asking for help from people they had previously engaged with, or even whom they knew socially. For one respondent this had been helpful, and made him more confident in the support he received:

'Oh yes, they've known me since I was a kid so it's, they're all right round here because I'm a local lad and they're local people that work here. They know my dad so they know me, don't they?'

6.100 However, for four service users it was a matter of concern, and they stated that dealing with someone who already thought they knew everything about them meant that they were not listened to or supported:

'I've no idea… I think it's something to do with this one officer … we've had arguments in the past and since then, since he's been the manager I can't get a flat'.

6.101 Another respondent, five years on after first encountering homeless services when she left home at 15, reported on the difficulties of encountering a housing worker who had known her several years before:

'She goes, "Oh I see you're in the same position then again", and I was like, "well everyone changes". I think what it is with some council people, is that they judge the people still by what they've already done'.

6.102 When looked at by area, the differences in the services provided are clear. Two areas in particular had very high rates of confidence amongst service users, while for two others, fewer people reported a lack of confidence in the local authority than those who did not. The reasons for this, and how it correlates to the authority's situation, will be explored further in the final report.

Experiences of Hostels

6.103   Thirty-seven respondents[18] were living in a hostel at the time of the interview, and their reactions to the hostels were on the whole very positive in three of the case study areas, and more mixed in the others. Fifteen respondents talked about their initial worries about being sent to a hostel, highlighting the importance of feeling safe and supported in such spaces:

> *'Do you know what, I was really scared to come here because I thought, you know what, we're going to be here for ages, no one's going to help us, we'll be stuck here but since we've got here. It's been a little bit slow finding somewhere for us but we have got somewhere to go. We're just waiting but, yes, it's been brilliant. It's like we get, any help you need you just ask [hostel staff] or anyone, if they can help you they'll help you, it's really good'.*

6.104   In some areas, respondents often knew to access hostels through their own networks rather than through referrals by the local authority. One respondent described their experience of accessing hostel services as traumatic, and one which would have been even worse without the support of other people in similar circumstances:

> *'I cried to this woman, I was on the streets or whatever, she was like, 'There's nothing we can do for you.' … It's just - they didn't give no help whatsoever, but luckily I come here and these have helped me, because if these weren't here then to be honest with you I don't know what I'd do'.*

6.105   While another service user talked about being unable to access hostel accommodation, in spite of presenting to the local authority:

> *'The council, they - basically they told me I'm fit enough to live on the streets for 50-odd days'.*

6.106   There was some criticism of the hostels however. In the areas where more criticism was expressed, this seemed primarily to be due to personality clashes with managers and disgruntlement with the systems in place for allotting bed spaces.

6.107   Across all of the areas, eight respondents expressed concerns about succumbing to previous negative patterns of behaviour while living in a hostel, or being anxious

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[18] Interviews were conducted in hostels where the study team were unable to get the needed numbers through people newly presenting to the local authority.

about being around people using drugs and alcohol. In the words of one young woman:

'This is what I'm scared of, if they go to me, 'Right, okay [name], can you please go into a hostel if we place you there?' I think to myself, 'Oh my God the last time I was in a hostel, I took drugs, I got myself into trouble', and it's not the best of scenery. I've been placed in a hostel which is like an older version and I was the only girl there. Girls aren't even supposed to be there and I was the only girl. It was like older men and things and they weren't very nice, at all. It was quite scary the positions that they do put you in'.

6.108   For those struggling to overcome addiction this was a significant concern. Alternatively, one or two respondents said that the kind of support they needed (for lower level support needs) was missing from a system geared more towards clients with complex needs. They held negative views of fellow residents, in the words of one:

'I am not a brawling, alcoholic, heroin addicted drunk, junkie so to speak, and I don't want to go through a system that's basically tailored to that'.

6.109   However, most respondents spoke very positively about their experiences in hostels.

6.110 Of the 130 respondents who were not yet rehoused and who felt able to answer this question, the overwhelming majority stated that they would be willing to take any home that was made available, provided it was their own space, no matter how small. Only one respondent described himself as happy to occupy a room in a shared house. Only six people expressed a preference for a flat in the private sector, while 38 held a strong preference for either social or supported housing.

6.111 While many service users indicated that they were willing to accept any type of accommodation and accepted the need to find accommodation in the private rented sector, most expressed a preference for social housing. However, the majority were aware that there was no social housing available.

Figure 6.13: Respondents' hopes for a home
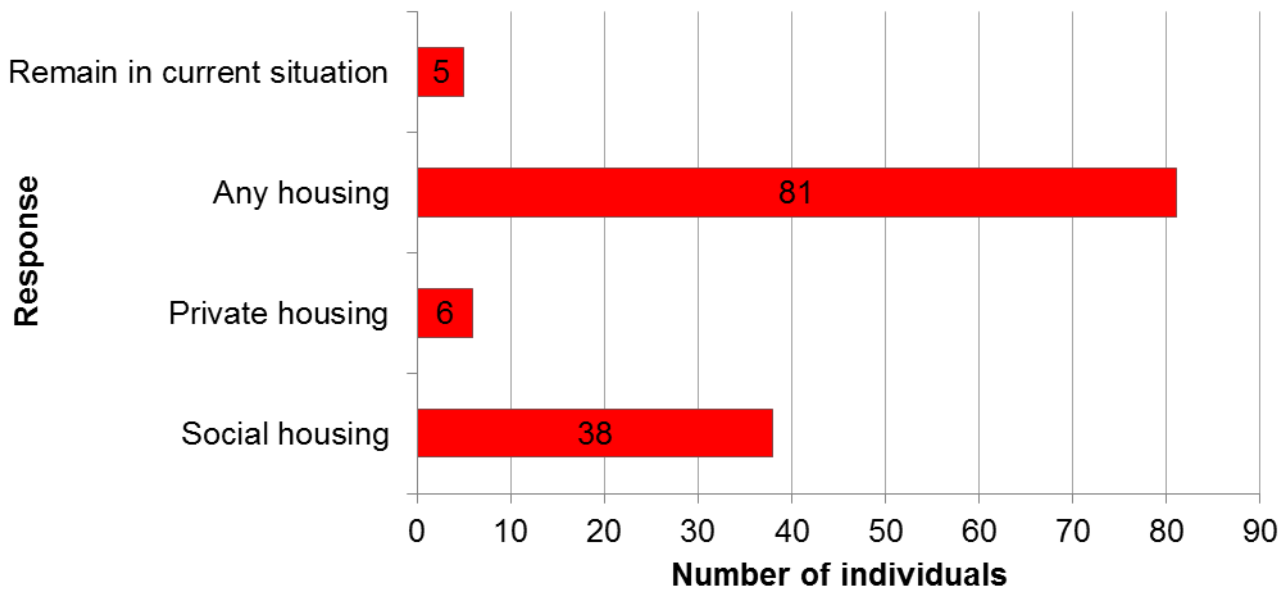
6.112 Only four of the 130 respondents were uncertain about what their housing situation would be in six months' time. However, most were broadly optimistic that their circumstances would improve, with only one respondent indicating that they would remain living in hostels for up to two years. Some of the people interviewed had recently been rehoused by the local authority or had found private housing themselves. This amounted to 24 people across the case study areas. Those who had been placed into social housing accommodation were the most satisfied. Of those who had recently moved into private rented accommodation, most expressed a high level of anxiety about both the high rent and the insecurity of tenure. All of those in the private sector had remained on the waiting list for social housing.

6.113   Across all case study areas 33 people explicitly related the resolution of their housing situation to the achievement of broader life goals, seeing it as a vital first step. A number of them equated a new home to a new start:

'Just hopefully be in a property and paying rent, back into work. I'm a grafter. I've worked since I was 14. I've always worked. That's what's making my depression even more because I can't work, so back in a property, life looking better, back into work, starting new, fresh again, putting all this behind me'.

6.114   For over half of respondents still seeking housing, a permanent home represented a chance at a new life, a new start, and possibly a place to rebuild family and community ties:

'To get a place of my own. To help myself more, to get better and stuff. See my kids again as well because I miss them. Yes…Just to, I don't know. I do know but I don't. Just to be me. I'm me. I'm like not anybody higher, anybody lower.

6.115   For 18 of the men who were fathers and who found themselves homeless either because of a relationship breakdown or time spent in prison, their principal goal was to have a settled home with an extra room so they could rebuild relationships with their children and have them to stay. For some others, especially the families, a permanent home represented a return to normality:

'Just to find a suitable house for me and the children so we can get back to normality'.

6.116   Another respondent, who was staying in refuge accommodation, spoke about having gained employment and hoped to become settled in a new home, however, she talked about how the experience of becoming homeless through domestic abuse had caused her to feel as though her life had regressed:

'I've had two jobs. I've got a permanent job now, whereas I was temping when I first got here, but I've managed to get a permanent job now, so I'd just like to relax, enjoy the life here, do my work and have somewhere settled… because obviously I'm communal living and it's been quite difficult…I've gone backwards in life to like when I was 18'.

6.117 A number of service users described their hopes of finding a home as being hampered by their personal circumstances as benefit claimants. They described how they were excluded from the private rented sector since landlords or lettings agencies were unwilling to accommodate those claiming Housing Benefit.

'I have tried looking for private rental, but again, due to the sanctions on housing benefits, it's kind of impossible to do that without moving in with someone as a partner because that's the only way you could actually obtain sufficient funds to afford a one-bed. As I say, the only accommodation that I, as a single person, could afford would be a bedsit, but any bedsits round here don't accommodate housing benefits payments, so it's a bit of a loophole'.

6.118 Of the 24 people who had managed to find new housing in the private sector, 20 still wanted to be in social housing in the next six months due to the perceived security that it offered. However, many expressed having little hope that this would actually happen. One respondent commented:

'I'd feel more secure if it was a council house or through a housing association but I'm fully aware of the situation and how hard it is. Yes, ideally, that would be a more - I would feel it would be a more secure housing situation because the problem with private is they can do what they want, basically, and as much as the council say, 'You've got this' and, 'You've got that' it's a long hard fight'.

6.119 Another respondent talked about the insecurity of renting in the private sector noting that high rents would mean their housing situation remained precarious:

'I think if I go to the private renting that I'll be back here in a year doing this same thing. If I go to temporary, then I'll be ok I think'.

6.120 Amongst younger people, particularly those who were single or young couples without children, eight people expressed feeling hopeless about finding a place to live and frustration that there was no support for them to get their lives back on track. One respondent described this as follows:

'It's just this issue with the homelessness and the night shelter and everything, it's all I've got basically. It's just like every day is like a challenge, it seems to me. It's a challenge. There's no end to it. I can't see any end to it at all, to tell you the truth.'

6.121 Sixty respondents who were not already housed felt reasonably confident that they would be, yet 30 people said they were hopeful but still fairly uncertain. There were, on the other hand, a significant minority of respondents who said they were worried that they would not be able to find a place to live at all, despite the help from housing services. This was primarily due to the perceived lack of affordable housing, particularly for younger, single people.

Gaps in service provision

6.122 As previously discussed, just over half of respondents said that there were no gaps in the service they had personally received. Many people indicated that they recognised the pressures that local authorities and the staff working with them faced. These identified gaps centred on two overarching issues: the lack of adequate housing and local authority communication with service users. More specifically the gaps included: lack of emergency shelter; the need for more appropriate hostel provision for women and couples; the need for accommodation which permits animals; lack of social housing/adequate private rentals; the importance of face-to-face contact; the importance of politeness and empathy from staff; and clearer information and more regular updates.

Lack of emergency shelters

6.123 The most urgent gap appeared to be the lack of emergency shelter in three of the six locations, as indicated by the amount of time some of the respondents were forced to sleep rough before being provided with emergency accommodation. In one area, there was a 'lottery' held in the evening when there was insufficient space. As one respondent commented:

> *'If you get pulled out the hat, you're on the streets. That's how it goes. If there's more than 16 people in the night shelter, if you haven't got a local connection, you're knackered. You're thrown out. Then if there's still too many, your name will go into a hat and if your name's picked out of the hat, until there's 16 people left you leave'.*

More appropriate hostel provision for women and couples

6.124   Seven female respondents said that they had been inappropriately placed into mixed hostels, and had concerns about their safety, while some couples were unable to stay together, which made the situation more difficult and stressful for them:

> *'If they would have stuck me and [partner] in the same room straightaway because it stressed [partner] out a bit and now we're in there and she's settled down and we're all okay now'.*

6.125   Another respondent described the high costs of emergency shelter accommodation, particularly for those who were in paid employment, and how that made it impossible to save money to start rebuilding their life:

> *'Because I do work... I mean, the cost of refuge is £350 a week so I've had to claim benefit because my wages are not £350 a week, even though I work 50 hours. … I basically work for the equivalent to Jobseeker's Allowance at the moment, and no matter what I earn extra I cannot save because the more I earn the more they take…plus the storage fee's £105 a month on top of that, it's a vicious circle…you know, of not being able to save anything to get myself out of it, and a discretionary housing payment is my only way out of it'.*

6.126   For the respondent quoted above, the local authority had been unable to provide social housing, but it was working to help find housing in the private rented sector. Key to this was support in providing a bond. The need for a bond, however, had proved problematic for several respondents because the time-consuming, bureaucratic process of securing and being in a position to provide a bond, meant that support had come too late for a handful of respondents in areas of high demand for private rented accommodation.

The need for accommodation which permits animals

6.127   Eight respondents apologised or felt embarrassed for not just requesting accommodation for themselves, but for needing housing that would accept pets, particularly dogs:

> *'In fact, in some ways, I think that they've helped me that little bit more because of the dog, because they understand me. I suffer with post-traumatic stress disorder, bad from when I was a soldier, and she's my godsend, the dog, so they*

understood all that, and they've been fantastic. I know it may sound daft on your recording and whathave you'.

6.128 As the quotes above show, being accommodated with pets was particularly important to the vulnerable elderly and to those with mental health issues. This kind of companionship is important in thinking about how these groups maintain resilience and adapt in the face of adversity, signalling a more important role for these animals than simple pets.

Lack of social housing/adequate private rentals

6.129 Over the course of the interviews, most respondents expressed a desire for social housing as it was affordable, better quality than private rented accommodation, and had a much greater security of tenure. Only six people stated that private rented accommodation would be satisfactory if it was of the same standard as social housing. Twenty people returned to this theme when asked about gaps in support:

'Put more social housing up, provide more social housing because there's so many abandoned buildings around here but then there's so many homeless as well'.

'The council, yes, build more houses so people can actually get into them. There's like 10 per cent of houses available for the amount of people that need them and then try and get those out of houses that are way too big for them anyway. People are living in three bedroomed houses and they only need one, for those that do need the bedrooms'.

6.130 While 15 service users specifically talked about the lack of housing for single people:

'We just need to build more houses, more for single people because there's lots of single people that haven't got anywhere to live at all because they can't afford it a lot of them'.

Clearer information and more regular updates

6.131   For 40 people, who indicated that they were highly anxious about what would happen and when, their greatest complaint was the lack of regular updates from local authority staff regarding their cases. Whilst some respondents suggested that being given a timeline would help them to understand what was happening and to alleviate their worries, others considered that a regular update, however brief, would help to satisfy them that their case was progressing:

> *'The only other thing is keep you updated, just a two-minute telephone call. 'We're on the case, no worries. Be in touch'.*

> *'I'd like to know more than what we were getting to know actually because we're getting evicted in, what is it, a month's time and we don't know where we're going and what we're doing, whether we're going to be on the street or bed and breakfast or whether we're going into one- or two-bedroom or what it is… We'd have liked to have had a timeline of what is happening or when things happen or, you know, when they give out houses, if they give them out on a weekly sort of basis or on a monthly basis or something like that'.*

6.132   Seven people said that they found the information initially given to them overwhelming and hard to understand, particularly given the stress they were experiencing. Reflecting on the difficulty in retaining information, one respondent suggested that it would be helpful if they received written information on the process and what to expect:

> *'Maybe a little booklet to let people know what the process is because it can be quite overwhelming I think when you're worried where you're going to live, especially if you've got kids and stuff. What they tell you at the meeting you may not remember it all so if there was a little handout that explains, right, you're registered with housing now, you're expected to do this, you will be contacted if this happens, you know, and just explain the process so you've got something to refer to'.*

6.133 Others described having to repeat their stories to different members of staff, and suggested that better communication between local authority staff would prevent this from happening:

> *'Maybe communicate more because I don't - like I said, I had to repeat myself loads and they should update the system and stuff'.*

6.134 Clearly, the frequency and content of communication was an issue with an indication of the timeline process, what people can expect to happen as well as what they are expected to do and when being necessary. The last quote also raises an explicit implication in relation to record-keeping and information-sharing so that service users are not obliged to repeatedly explain their circumstances (which is ultimately incongruent with a person-centred approach)

Summary of findings from service users

6.135 From this first round of qualitative interviews a few patterns emerge. The first centres on the reasons why people become homeless although there is considerable variation in people's individual circumstances. Factors leading to homelessness include: relationship breakdown, domestic violence and abuse; being unable to continue living with family; issues in the private rented sector; lack of accommodation upon release from prison/other institutions; eviction from social housing and being unable to access social housing due to previous breaches of tenancy; eviction from emergency/hostel provision; rent arrears, low incomes and benefit issues.

6.136 It is clear, however, that those respondents who had experienced problems with their family were the largest cohort seeking support. Of this group, the largest number emerged from a breakdown in relationship, demonstrating a need for immediate, affordable accommodation for single people. The second largest cohort consisted of young people forced to leave their homes for a variety of reasons. Many of these young people experienced more complex problems, and a majority had been in the system for some time. Interviews show that homelessness prevention for this group may need to prioritise support for young people just about to leave care and provide more comprehensive services to provide more structure and stability in those initial years. This will be explored further in the second wave of interviews.

6.137 Problems in the private rented sector formed the second largest cause of homelessness overall, and for two case study areas this was the primary cause of people approaching the local authority for support in finding a home. The insecurity of tenure in this sector, and reports of poor dwelling conditions and difficulties with private landlords are significant challenges. Service users often expressed frustration with accommodation in the private sector being offered as solutions to their homelessness. This is especially understandable if their homelessness had been caused by problems with tenancies in the private rented sector. In talking about their hopes for the future, the majority of people said they wanted a tenancy in the social housing sector, as they felt that this offered greater security and better quality than the private rented sector. Many respondents saw the biggest gap in local authority services very simply as the lack of social housing.

6.138 Several factors affected the whole cohort of service users and contributed to causing or sustaining homelessness. The impact of limited job opportunities in the areas in which they lived, low incomes, the lack of affordable housing, and the impacts of Welfare Reform intersect to create significant challenges. This appeared to affect everyone, but particularly single people under 35 years of age. Evidently, these factors are related to income. In addition, debt was an issue for many people and for a few, the previous accrual of rent arrears in social housing was a factor in contributing to their continued homelessness. It became clear that many respondents were accessing a range of services to help provide for basic needs – such as food banks - even those who were in employment. The bedroom tax is continuing to have an impact, though small, as are benefit sanctions.

6.139   Other factors causing or sustaining homelessness related to health with the high incidence of mental health issues appearing to contribute to people's difficulties in accessing and sustaining accommodation. For the most part those people with the most severe illnesses were receiving adequate support, though for some, such support was only available following a period of rough sleeping. For many others, however, this was a support need that had not been fully addressed. Mental health issues underly many of the other more immediate causes of homelessness, such as substance abuse, criminal activity, times spent in custody and relationship breakdown within families.

6.140   From the data gathered during this first wave of service user engagement, it is apparent that a slight majority of service users were directed to homeless services through referrals from other services. Some people had prior knowledge and others were advised to approach homeless services by family and friends. Less than half of the respondents in any of the case study areas had previously approached the local authority, and for some areas it was as low as a quarter. A number of those had simply registered to be on the waiting list for social housing. Of the others who had approached the council, respondents described mixed experiences. Many found the support they received helpful, and had accessed permanent housing. For those who had since lost their accommodation, the reasons were varied and ranged from relationship breakdown to time spent in prison and the accrual of rent arrears.

6.141   Respondents were broadly very positive about the help they had received across the case study areas where they indicated that the local authority had listened, understood their situation, and was in regular communication about their case. Although there was considerable variation in people's individual circumstances, the need for support and regular communication were highlighted as being important. Given the prevalence of mental health issues among the people interviewed, both communication and a wide understanding of support needs and available resources seemed particularly important in helping people to achieve housing stability. For many, an existing condition such as depression or anxiety had been a contributing factor in their homelessness, but a number of others had experienced mental illness and distress as a result of facing homelessness.

6.142   In general, people said they were supported by the local authority, and a large number had had very positive experiences. The vast majority of those interviewed indicated that they had been treated with dignity and respect by local authority staff. The majority of respondents were uncertain about what their housing situation would be in six months' time. However, most were broadly optimistic that their housing circumstances would improve.

6.143   A slight majority of respondents indicated that there were no gaps in the service they had personally received. The gaps that respondents did perceive clustered around two principal overarching issues: the lack of adequate housing, and communication.

7.   Conclusions

7.1   This chapter presents the conclusions drawn from consultation with national
stakeholders, the survey of all Welsh local authorities and first wave interviews with
154 service users across six case study areas. For the purposes of this interim
report, convergence and divergence in views on the implementation of the Act, in
terms of process and impact across the different cohorts (where appropriate), are
identified.

Process

The focus on prevention

7.2   Overall, local authorities indicated that they support the increased focus on
prevention introduced under the Act, and they believe the legislative changes have
had positive effects. National stakeholders also suggested that good progress was
being made, however they reported that there is inconsistent application of
preventative activities across Wales. Stakeholders responded positively as regards
the ethos, intent and provisions of the legislation, generally citing that the Act has
established a clear, consistent and transparent set of guidelines and processes for
local authorities to tackle homelessness across Wales.

7.3   Local authorities reported that the preventative approach to homelessness is
working, with over half indicating that prevention activity has increased since the
introduction of the Act, and that it has helped them to improve their information and
advice services. This was a view shared by national stakeholders who also
indicated the Act has increased the levels of advice and assistance available to
people.

7.4   National stakeholders and local authorities outlined a range of successful
prevention activities, including but not limited to outreach, mediation, advocacy,
accommodation, and other forms of tenancy support. However, it is important to
note that local authorities indicated that the main form of prevention is financial
assistance – for rent guarantees, payment of deposits/bonds, rent arrears accrual –
and there are resource implications, as transitional funding currently sustains this.

7.5   Significantly, the reduction in activities which local authorities perform under Help to Secure suggest that homelessness is being prevented for a larger number of people than previously.

7.6   National stakeholders and local authorities welcomed the doubling of the period when people are considered to be threatened with homelessness. Almost all local authorities indicated an increase in preventative work and were positive about its effectiveness. Some national stakeholders expressed concern about whether this would limit the assistance available to people approaching services outside of the 56 day period, but the majority of local authorities indicated that they engaged in some preventative work when the threat of homelessness is greater than 56 days.

Code of Guidance

7.7   Practically all of the local authorities indicated that they found the "Code of Guidance" useful in facilitating understanding of and compliance with the Act, and praise was offered for its comprehensive approach. However, some local authorities commented that having the Code of Guidance earlier would have helped in the remodelling of services in response to the Act. Some local authorities also stated that the inclusion of scenarios or case studies would deepen understanding of issues that frontline officers are likely to face. This view was largely shared by national stakeholders.

The use of intentionality

7.8   None of the local authorities have changed their formal overall position on intentionality thus far, although some specific changes have been made. Five local authorities have disregarded intentionality for priority need groups, and four are currently reviewing their approach. Some local authorities indicated a willingness to review their approach in the future, while others were more cautious about altering the way they currently work. No authorities reported any effects from changing intentionality from a duty to a power. In contrast, there were mixed views from national stakeholders on the use of intentionality; several supported the flexibility it gave local authorities, and a small number thought it was a useful safety net for local authorities. However, some national stakeholders said that it should be removed altogether to fully reflect the ethos of the Act.

Priority need/non-priority need

7.9   Some national stakeholders expressed concerns about the lower threshold regarding vulnerability as defined under s71 of the Act; however, less than half of local authorities indicated that they had changed their application of the vulnerability test under the new legislation. National stakeholders suggested that people who were not considered to be in priority need had better outcomes than under the previous legislation, although they were less clear whether people in priority need were any better or worse off under the new Act. As indicated above, a smaller number of people are being assisted under s73, which suggests that people are receiving assistance under the Act's earlier stages and that priority need is only significant at the end.

Local connection

7.10   Most local authorities indicated that there has been no dramatic change in numbers of people presenting without a local connection; that is, from other local authorities/cross border. Whilst national stakeholders concurred with this view, some raised concerns about managing demand for homelessness services in urban areas where accommodation is scarce: Cardiff in particular.

Pathways

7.11   In the main, stakeholders said that the pathways for homeless people with support needs were clear. However, local authorities indicated that there was significant variation in their use across Wales, with some authorities having pathways in place for people with mental health issues for example, while others did not. Local authorities indicated that the group that appears to have seen the biggest changes to the information and advice services offered to them are people leaving prison or youth detention accommodation (through the Prison Leaver Pathway). This is discussed in more detail in terms of the impact on service users under 7.19 and 7.20.

Supporting People

7.12   National Stakeholders were emphatic about the integral role of Supporting People in successfully implementing the legislation. At the time of the survey, 15 local authorities reported having gateways for referrals to Supporting People services through a centralised team to specialist services, and a further local authority was in the process of establishing such a gateway. However, a variable picture emerged across Wales with regard to Supporting People services; in some authorities, services are part of homelessness teams and this was thought to work well.

Evidence and monitoring

7.13   Some significant concerns were highlighted by stakeholders regarding the use of statistics to evidence and monitor outcomes. Only a minority of stakeholders reported that they were clear, with the majority indicating that they were difficult to decipher and significantly, that they do not capture or reflect the homelessness prevention and relief work being undertaken across Wales. This was in part attributed to the way that data are collected and presented and that there is variation in recording activity across authorities and areas of operation. Stakeholders identified a number of key areas where they felt that there were inaccuracies and discrepancies relating to the numbers of households threatened with homelessness; the numbers of people found to be unreasonably failing to co-operate with local authority homelessness services; unsuccessful preventions of homelessness; the numbers of BME households assisted; and the numbers of referrals from Supporting People. It was also suggested there are gaps in the data relating to the work of partner agencies.

7.14   Responses from the local authority perspective also highlighted some shortcomings in the way that data are collected and recorded. While the majority of local authorities commented that they were able to measure outcomes for people, only a minority noted that increased monitoring has taken place since the Act came into effect, and responses reveal variation in the way they monitored activity. For example, a quarter of local authorities stated that they do not collect data on equalities monitoring, which is significant as ethnicity and gender are needed for statistical returns for Welsh Government. Overall, local authorities reported little analysis of outcomes by equalities characteristics and some authorities are not sure how this data is used. Some local authorities stated that withdrawn applications is

an area where there are gaps in monitoring, and only one local authority report having processes in place to follow up withdrawn applications.

Impact

Resources

7.15 Both national stakeholders and local authorities expressed significant concerns about the reduction and eventual removal of transitional funding. While cognisant of the fact that the current funding is by its very nature transitional, both cohorts suggested that there is a need for longer term, sustainable funding to ensure that prevention activities continue to be resourced and the Act successfully implemented. This was deemed necessary both in terms of numbers of appropriately trained staff and financial assistance to those threatened with homelessness. Even at this stage in the Act's implementation, a large number of local authorities indicated that limited resources had been problematic. Importantly, as discussed in Chapter 5, financial support was cited as a key prevention activity by local authorities.

Outcomes for service users

7.16 National stakeholders emphasised that under the new Act, people who present to homelessness services are generally treated better and have more positive outcomes. Almost all local authorities indicated using personal housing plans, and it was generally agreed by both national stakeholders and local authorities that this has led to more positive working practices and relationships between local authorities and service users. Therefore, there is a broad consensus across the local authority and national stakeholder cohorts about the positive effect of the Act, and of the 'person-centred' support it has engendered. However, it seems clear from the findings from both data sets that there is variation in the implementation (both in terms of process and impact) of the Act. This can in part be explained due to differences in context, for example the demographics of a particular authority, the operation of housing markets, and demand for services. Concerns were also raised about the lack of accommodation for single people and in relation to the levels of rough sleeping.

7.17   The experiences of service users further illuminate these issues. Only a small number could compare previous experiences of presenting to homelessness services (under the old legislation) and some of these people felt that the new legislation was better, while others felt there was less support. In terms of their overall experiences of support received under the Act, service users were generally positive about the help they had received. They also indicated that their experiences reflected the ethos of the Act, and they reported positive interactions with local authority staff. In the main, service users talked about positive experiences where: homelessness services were accessible; the local authority was responsive, and seemed to understand their situation and how to help them; staff treated them with dignity and respect and showed empathy for their situation; local authority staff communicated with them throughout the process and provided practical solutions. In short, the approach was 'person-centred'. Some people suggested that there were limits to what the local authority could do to help them but were still positive about how they were treated by staff. However, service users in two of the case study areas reported much less positive experiences, and these centred on: difficulties in accessing services; a lack of face-to-face contact with staff; and a lack of responsiveness from local authority staff. In these circumstances, it was often reported that staff communication was poor. In some instances, some service users indicated that they felt that staff were not empathic and that some appeared to have negative views about them, which was thought to impact negatively on outcomes. This underlines the importance of the person-centred approach, which helps people to feel positive about the process. The findings from service users suggests that there are some gaps in fully applying the ethos of the legislation and partnership working with some local authorities.

The impact on people with protected characteristics/vulnerable groups

7.18   Responses from local authorities were mixed regarding whether there have been any changes in the way that people with protected characteristics are dealt with under the new Act. National stakeholders suggested that the impact of the Act on people with protected characteristics/vulnerable groups largely centred on the variability in service provision. This is both in relation to differences across local authority areas, and also in terms of the protected characteristic involved, with people with mental ill health experiencing the most difficulties. Local authorities also stated that there were often challenges in providing support for people with mental health issues. National stakeholders suggested that single men, care leavers, ex-offenders and those experiencing multiple issues were thought to be particularly at risk of having unmet needs. The experiences of service users supports this, as most of those who were homeless following their release from prison did not receive any help to find accommodation prior to their release, suggesting that the Prison Leaver Pathway was not consistently applied. However, the small number of women in this position reported more positive experiences.

7.19   Although those service users with the most serious mental health conditions appeared to be receiving appropriate support, for many others, their mental health needs did not appear to have been properly addressed, and they were not receiving any support. It is unclear whether this was due to individuals not meeting a 'threshold' to access mental health support, whether services were unavailable in their local authority area, or whether they had actually attempted to access any services. This is an area of concern. A large proportion of service users indicated that they experienced issues with their mental health, but several others chose not to answer this question and appeared to be in poor mental health during the course of the fieldwork. Often people who were experiencing mental health issues were also experiencing/had experienced other difficulties, for example alcohol and substance misuse, criminal activity, serving time in prison and relationship breakdowns.

Impact of the Act on local authority staff

7.20   Over half of local authorities indicated that there had been an increase in demand for services since the introduction of the prevention duty and it was generally felt that this placed additional workload pressures on local authority homelessness teams. Seventeen local authorities reported challenges in implementing the Act and adapting to new ways of working, indicating that this was in part due to cases being open for longer and an increase in bureaucracy. This view was shared by national stakeholders, who raised concerns about the amount of paperwork and available resources. Stakeholders also identified the issue of staff turnover as some members of staff struggled to adjust to the new ways of working. However, some stakeholders suggested that the Act had also led to more positive working practices and changes in organisational culture. National stakeholders also suggested that the employment of new staff – replacing those who were unable to adapt to the changes – provided a further opportunity for improving services and embedding a person-centred ethos, but highlighted that this has implications for further training required.

Impact of the Act on Registered Social Landlords (RSLs)

7.21   The majority of national stakeholders did not think that the new legislation had changed the role of RSLs in preventing homelessness, and suggested that many were already working in partnership with local authorities to prevent and resolve homelessness. Some stakeholders indicated that the Act had consolidated the relationship between local authorities and RSLs, providing a clearer framework to operate in. However overall, a mixed picture emerges here where some examples of good practice were highlighted, but concerns were also expressed. The responses from the local authority survey corroborate this. Eight local authorities indicated that the Act has enabled more effective co-operation with RSLs, while nine reported no change and five disagreed. Local authorities stated that there were examples of relationships working well, in terms of improved communication and information-sharing for example, and others where there were challenges, particularly with 'difficult to house individuals'.

Impact of the Act on the private rented sector

7.22   The consensus among national stakeholders was that there was no option but to use the private rented sector to provide housing solutions for a range of people; some said that this was a positive step, while others highlighted concerns about variability in availability, standards and security of tenure across Wales. Although local authorities indicated that social housing is the main way in which local authorities fulfil their duties to secure accommodation for applicants in priority need (s75) when the duty in s73 ends, they reported making more use of the private rented sector to prevent and relieve homelessness. From the local authority survey, there were examples of good practice, for example, landlord forums and private rented sector officers employed by the council.

7.23   Although local authorities can now discharge their duty into the private rented sector, supply has not increased, and local authorities also raised concerns about the availability, affordability and sustainability of private rented accommodation. Significantly, among service users, problems in the private rented sector were identified as the second highest cause of homelessness and for two of the six case study sites, the primary reason for people to approach the local authority for support in finding a home. The high cost, lack of availability, insecurity of tenure and poor dwelling conditions in the private rented sector were all perceived as significant problems by service users. While many service users indicated that they would accept a tenancy in the private sector to resolve their homelessness, the majority expressed a preference for social housing, but were aware that they were unlikely to be offered a social housing tenancy. It is important to note that those who had found accommodation in the private rented sector, remained on the housing register for social housing, indicating that it was not viewed as a long-term, stable solution for people who had experienced homelessness.

The impact of the Act on the use of temporary accommodation

7.24   Seven local authorities reported a reduction in the use of temporary accommodation, and this was attributed to preventative work. Similarly, national stakeholders perceived that the use of temporary accommodation had declined since the introduction of the Act. However, eight local authorities indicated that their use of temporary accommodation has increased, which some attributed to a need for more move-on and one-bed accommodation. Seven local authorities reported no change. Again, this suggests a mixed picture across Wales.

7.25   A mixed picture regarding the use of temporary accommodation was also reported by service users who reported a lack of available temporary, hostel and emergency accommodation across the local authority areas. Those staying in hostels at the time of the first wave of fieldwork were very positive about the hostels in three of the six areas and more ambivalent in the others.

The impact of the Act on other agendas and partnership working

7.26   Most national stakeholders indicated that the Act has had a positive impact on other agendas and that the links between these (Violence against Women; Future Generations; Social Services and Well-being) were clear. Some were similarly positive about improvements to partnership working, and the findings from the local authority survey since they indicate that there has been a significant increase in partnership and multi-agency working with both internal and external partners and agencies. Concerns were raised by stakeholders regarding the potential impact of other agendas - for example Welfare Reform – on the successful implementation of the legislation. However, some stakeholders expressed concerns about partnership working, suggesting that there is variability across authorities in terms of partnership working, which is an area to address. From the data gathered during this first wave of service user engagement, it is apparent that a slight majority of service users were directed to homeless services through referrals from other services, suggesting effective processes between agencies, in some areas at least.

7.27   In summary, the Act has had a significant impact on service users since more people are now able to access advice and assistance and help to prevent and relieve homelessness. However, the impact appears to have varied for people with protected characteristics/vulnerable groups, and people with mental ill health in particular. National stakeholders suggested that single men, care leavers, ex-offenders and those experiencing multiple issues are most likely to have unmet housing needs. Local authorities reported increased demand and workload pressures, yet appear to have adapted to changes under the new Act, in terms of undertaking more prevention activities and implementing changes in partnership working and organisational culture. Still, local authorities and national stakeholders relayed concerns about the availability, affordability and sustainability of private rented sector accommodation, and reported use of temporary accommodation varied considerably by local authority. However, it is clear that there is significant variation across the six case study areas, with two areas appearing to have made less progress in implementing the ethos underpinning the Act based on the experiences of service users.

Reference section

1. Reference section

Office for National Statistics (2012a). 2011 Census: Key Statistics for Wales, March 2011. https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuskeystatisticsforwales/2012-12-11#key-figures

Office for National Statistics (2012b). 2011 Census: Population and Household Estimates for Wales, March 2011. https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuspopulationandhouseholdestimatesforwales/2012-07-16

Office for National Statistics (2016). Wales population mid-year estimate. https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/timeseries/wapop/pop

Shelter Cymru (2016). *Reasonable Steps: Experiences of homelessness services under the Housing Act 2014*. https://sheltercymru.org.uk/wp-content/uploads/2015/02/Reasonable-Steps.pdf

StatsWales (2015a). Decisions taken by local authority area and eligibility. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Pre-April-2015/decisionstaken-by-area-eligibility

StatsWales (2015b). Households accepted as homeless by local authority area, gender and age of applicant. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Pre-April-2015/householdsacceptedashomeless-by-area-gender-age

StatsWales (2015c). Households accommodated temporarily by accommodation type and household type. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Pre-April-2015/householdsaccommodatedtemporarily-by-accommodationtype-householdtype

StatsWales (2015d). Households accommodated temporarily by length of time and household type. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Pre-April-2015/householdsaccommodatedtemporarily-by-lengthoftime-householdtype

StatsWales (2015e). Households leaving temporary accommodation, by reason for leaving and length of time. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Pre-April-2015/householdsleavingtemporaryaccommodation-by-reasonforleaving-lengthoftime

StatsWales (2016a). All cases where positive action succeeded in preventing/relieving homelessness. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/all-cases-where-positive-action-succeeded-in-preventing-relieving-homelessness

StatsWales (2016b). Households accommodated temporarily by accommodation type and household type (Post 2015-16). https://statswales.gov.wales/Catalogue/Housing/Homelessness/Temporary-

Accommodation/householdsaccommodatedtemporarily-by-accommodationtype-householdtype

StatsWales (2016c). Households by Local Authority and Year. https://statswales.gov.wales/Catalogue/Housing/Households/Projections/Local-Authority/2008-Based/Households-by-LocalAuthority-Year

StatsWales (2016d). Households for which assistance has been provided by outcome, age and gender. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/householdsforwhichassistancehasbeenprovided-by-outcome-age-gender

StatsWales(2016e). Households for which assistance has been provided during the year, by ethnic group of applicant. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/households-for-which-assistance-has-been-provided-during-the-year-by-ethnic-group-of-applicant

StatsWales (2016f). Households found to be eligible for assistance, unintentionally homeless and in priority need during the year: Categories of priority need by type of household (section 75). https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/households-found-to-be-eligible-for-assistance-unintentionally-homeless-and-in-priority-need-during-the-year-categories-of-priority-need-by-type-of-household-section-75-

StatsWales (2016g). Households found to be eligible, homeless subject to duty to help to secure during the year. Main reason for loss of last settled home by type of household (Section 73). https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/households-found-to-be-eligible-homeless-subject-to-duty-to-help-to-secure-during-the-year-main-reason-for-loss-of-last-settled-home-by-type-of-household

StatsWales (2016h). Households found to be eligible, unintentionally homeless and in priority need during the year. Main reason for loss of last settled home by type of household (Section 75). https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/households-found-to-be-eligible-unintentionally-homeless-and-in-priority-need-during-the-year-main-reason-for-loss-of-last-settled-home-by-type-of-household-section-75-

StatsWales (2016i). Households found to be threatened with homelessness during the year. Main reason for being threatened with homelessness by type of household (Section 66). https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/main-reason-for-being-threatened-with-homelessness-by-type-of-household-section-66-

StatsWales (2016j). Reasons for discharge of duty under section 75 during the year. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Statutory-Homelessness-Prevention-and-Relief/reasons-for-discharge-of-duty-under-section-75-during-the-year

Welsh Assembly Government (2008). *A Statistical Focus on Rural Wales, 2008 Edition*. http://gov.wales/docs/statistics/2008/080515-statistical-focus-rural-wales-08-en.pdf

Welsh Local Government Association (2017). *Local Authority Position on Housing Stock Transfer*. http://wlga.wales/local-authority-position-on-housing-stock-transfer

Welsh Government (2016). *Statistical First Release: Homelessness in Wales, 2015-16*. http://gov.wales/docs/statistics/2016/160824-homelessness-2015-16-en.pdf

Welsh Government (2017). *National Rough Sleeper Count, November 2016 – Experimental Statistics*. http://gov.wales/docs/statistics/2017/170201-national-rough-sleeper-count-november-2016-experimental-statistics-en.pdf

Annex A: Local Authority Survey

Post-Implementation Evaluation of the Homelessness Part of the Housing (Wales) Act 2014

Local Authority Survey Questions

Welcome to the 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.

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.

We encourage you to use the 'Finish later' option if you would prefer not to complete the survey in one sitting.

Please complete the survey and click the 'Finish' button by **5th 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: (for follow up)	

Please answer the following questions in detail, and give reasons for your answers.

Regarding implementation of the Act
We are now going to ask you about the implementation of the Act in your Local Authority.

2. How useful has the 'Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness', issued in March 2015 and revised in March 2016 been in helping your Local Authority to discharge its duties in relation to Part 2 of the Act?

Very useful ☐

Quite useful ☐

Neither useful nor not useful ☐

Not very useful ☐

Not at all useful ☐

Please explain your answer:

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

1.	
2.	
3.	

Resources
We are now going to ask you about how changes associated with the Act have impacted upon resources in your Local Authority.

4. What has the impact of the Act been on demand for homelessness services in your Local Authority?

5. How have you met this demand?

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

6. What channels does your Local Authority use to provide information, advice and assistance regarding accessing help for people who are homeless/at risk of becoming homeless under s60 of the Act? **Tick all that apply**

Face-to-face ☐
Telephone ☐
Web-based ☐
Other (please specify) ☐

7. How has the information and advice service changed to address the needs of the particular groups under s60(4) of the Act? In particular:

People leaving prison or youth detention accommodation:

Young people leaving care:

Young 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:

8. How has the information and advice service changed to address the needs of :

Single people:

Rough sleepers:

People with 'protected characteristics':

People from other local authorities/cross border:

9. Please describe 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.

10. Does your Local Authority use personal housing plans?

Yes ☐   No ☐

If yes, how useful have you found these?
Very useful ☐
Quite useful ☐
Neither useful nor not useful ☐
Not very useful ☐
Not at all useful ☐

Prevention
We are now going to ask you about the work that your Local Authority does to help prevent an applicant from becoming homeless.

11. 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**

Service	Local Authority Provision	Non-Local Authority Provision	Increase in provision AFTER the Act
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	☐	☐	☐
Other services, goods or facilities (please state)	☐	☐	☐
	☐	☐	☐
	☐	☐	☐
	☐	☐	☐

12. Has there been a change in how you allocate resources in order to offer the services discussed in question 11?

Yes ☐   No ☐

If yes, how?

---

13. Have there been any significant problems due to limited resources in the services discussed in question 11?

Yes ☐   No ☐

    If yes, please explain your answer and what steps you are taking to resolve these:

14. Are there any key services that you feel should be available in your Local Authority to help prevent people becoming homeless, but which are not at the moment?

    For what reasons can these not be provided at the moment?

15. Can you outline the process of how your Local Authority responds to people who are at risk of homelessness in more than 56 days?

Priority need
We are now going to ask you about Priority Need in your Local Authority.

16. Has your Local Authority changed its application of the vulnerability test under s71 since Part 2 of the Act came into effect?

Yes ☐   No ☐

    If yes, how?

17. Has your Local Authority changed its approach to those leaving prison and/or youth custody since Part 2 of the Act came into effect?

Yes ☐   No ☐

    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).

18. 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**

Service	Local Authority Provision	Non-Local Authority Provision	Increase in provision AFTER the Act
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	☐	☐	☐
Other services, goods or facilities (please state)	☐	☐	☐
	☐	☐	☐
	☐	☐	☐
	☐	☐	☐

19. Have there been any significant problems due to limited resources in the services discussed in question 18?

    Yes ☐   No ☐

    Please explain?

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20. To what extent has there been a change in the use of the private rented sector in your Local Authority following Part 2 of the Act coming into force?

Substantial reduction ☐

Slight reduction ☐

No change ☐

Slight increase ☐

Substantial increase ☐

Please explain your answer:

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21. To what extent do you feel there has there been a change in the **use of** temporary accommodation in your Local Authority since Part 2 of the Act came into effect?

Substantial reduction ☐

Slight reduction ☐

No change ☐

Slight increase ☐

Substantial increase ☐

Please explain your answer with reference to any changes in need, or changes in types of accommodation and length required:

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22. Has your Local Authority experienced any particular issues relating to securing accommodation for:

Single people:

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Rough sleepers:

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People with 'protected characteristics':

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People from other local authorities/cross border:

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Other (please specify):

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Duty to Secure
We are now going to ask you about the Duty to Secure in your Local Authority.

23. What has been the main way in which your Local Authority has fulfilled its duty to secure accommodation for applicants in priority need (s75) when the duty in s73 ends?

Private rented sector ☐

Social housing ☐

Other (please specify) ☐

[ ]

Please explain your answer:

[ ]

Intentionality
We are now going to ask you about regard to intentionality in your Local Authority.

24. Has your Local Authority disregarded intentionality for any of the purposes of s75 for any specific priority need groups?

Yes ☐   No ☐

If yes, which categories and what impact has this had?

[ ]

25. Have you made any changes to your original position on intentionality since July 2015?

Yes ☐   No ☐

Please explain your answer:

[ ]

Local connection
We are now going to ask you about local connection in your Local Authority.

26. Please can you outline your Local Authority's process for providing support for people seeking assistance without local connection in your Local Authority area?

[ ]

27. 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 reduction in demand ☐

Slight reduction in demand ☐

No change in demand ☐

Slight increase in demand ☐

Substantial increase in demand ☐

Reviews and appeals
We are now going to ask you about reviews and appeals in your Local Authority

28. How many reviews and appeals have been requested of your Local Authority decisions since Part 2 of the Act came into force?

	No. successful	No. unsuccessful
Reviews		
Appeals		
Total		

29. Has the number of requests for your Local Authority decisions to be reviewed/appealed increased or decreased since the Act has come into force?

Increased ☐   Decreased ☐

Please explain your answer:

30. Has there been an increase or decrease in the number of successful reviews and appeals of your Local Authority decisions since the Act has come into force?

Increase ☐   Decrease ☐

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.

31. Since Part 2 of the Act came into force 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.

a. Within your Local Authority

Yes ☐   No ☐

If yes, how?

b. With external partners

Yes ☐   No ☐

If yes, how?

32. How have relationships with the following developed since the Act:

RSLs

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Private Rented Sector

```
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33. Do you have:

A gateway scheme for Supporting People services

Yes ☐   No ☐

If yes, how does this work in practice?

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A formal referral process for Supporting People services

Yes ☐   No ☐

If yes, how does this work in practice?

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34. How are Supporting People resources targeted to support homelessness prevention?

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35. Does the homelessness agenda inform the commissioning of Supporting People services?

Yes ☐   No ☐

If yes, how?

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Measuring Outcomes
We are now going to ask you about how outcomes are measured in your Local Authority.

36. How does your Local Authority 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)?

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37. How effective do you think these monitoring processes are?

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[                                                    ]
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38. Which of the following equalities characteristics are captured in the data? Please choose from the list below.

Age	☐
Disability	☐
Gender Reassignment	☐
Marriage and Civil Partnership	☐
Pregnancy and Maternity	☐
Race (includes race, colour, and nationality (including citizenship, ethnic or national origins)	☐
Religion or belief (including non- belief)	☐
Sex and sexual orientation	☐
Other (please specify)	☐

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[                                                    ]
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No data collected	☐

39. How does your Local Authority use the equalities monitoring data?

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[                                                    ]
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40. What arrangements are in place in your Local Authority to measure outcomes for people receiving help under Part 2 of the Act?

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[                                                    ]
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41. How often is this outcomes information collected?

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[                                                    ]
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42. How do you use this outcomes data?

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[                                                    ]
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43. Do you **analyse** the outcome data by equalities?

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[                                                    ]
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Statement Ratings

44. 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.	☐	☐	☐	☐	☐
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	☐	☐	☐	☐	☐
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.	☐	☐	☐	☐	☐

45. For any additional comments you would like to make about the impact 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 in Wales.