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Tackling Homelessness in Wales: A Review of the Effectiveness of the National Homelessness Strategy



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Report presented by the Auditor General for Wales to
the National Assembly on 18 January 2007





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1. Between September 2001 and September 2004, there was an 85 per cent increase in the number of people accepted by local authorities as unintentionally homeless and in priority need. In November 2005, the Welsh Assembly Government (the Assembly Government) published its National Homelessness Strategy (the Strategy), which replaced the previous Homelessness Strategy published in 2003. The policy direction of the Strategy aims to strengthen the focus of homelessness services on prevention, support and access to housing. It had developed over a period of a year, during which the Assembly Government consulted, reviewed the research it had commissioned, and encouraged local authorities and service providers to refocus services. The specific expectations, commitments and targets of the Strategy were put in place in November 2005 when the Strategy was finalised.
2. Homelessness is the result of a complex mix of factors that can lead to individuals and their families having no home. Through the Strategy, the Assembly Government has taken a strategic leadership role, but its capacity to directly prevent homelessness by impacting on this complex mix of causes is limited, and by itself, cannot stop homelessness occurring. The Strategy identifies that homelessness can only be tackled by a partnership approach at local and national level. The Assembly Government funds a number of schemes and issues guidance to local organisations on preventing homelessness. However, it has limited control over trends in the housing market, key elements of Housing Benefit policy remain the responsibility of the UK Government and delivery of local prevention and statutory homelessness services is the responsibility of local authorities.

3. We examined whether the Strategy can help to prevent homelessness.

We concluded that the Strategy provides a clear strategic focus for local service delivery that can help prevent homelessness. Key risks remain and progress is needed to further improve co-ordination, local prevention services and evaluation. In particular, we found that:

- The downward trend in homelessness is positive but not conclusive.
- The Strategy has encouraged a more joined-up approach to preventing homelessness. Further progress is needed to improve co-ordination and local delivery.
- The evaluation of the Strategy, policy and services needs strengthening.

The downward trend in homelessness is positive but not conclusive

4. Statistics suggest that homelessness in Wales is decreasing. The number of households accepted by local authorities as unintentionally homeless and in priority need fell from 2,614 in the three months to the end of September 2004, to 1,898 in the three months to the end of June 2006. There has been a notable reduction in the number of 16-17 year olds who are unintentionally homeless. This is a significant achievement, as local authorities believe young people to be one of the most difficult groups to rehouse. The reduction in acceptances is reflected in a similar fall in the number of people presenting themselves as homeless and requiring a local authority decision, from 22,580 in 2004/2005 to 18,593 in 2005/2006. Although there has been a substantial reduction

in the numbers accepted as homeless, from the peak of 2,614, there has been an increase over the last six months from 1,560 at the end of December 2005, to 1,898 people in the quarter April to June 2006. The reasons behind this increase are not yet apparent, and the success of the Strategy will need to be assessed within the context of future quarterly results.

5. These statistics on homelessness may not tell the whole story. Not all people who are homeless present themselves to the local authority. For example, some people who lose their home and do not find alternative accommodation often do not present as homeless, and there is evidence that some prisoners discharged without prospect of accommodation, do not present to the local authorities.
6. The Strategy and the focus on prevention services can reduce homelessness and the numbers of people who are accepted as statutorily homeless, but cannot stop homelessness. If no additional accommodation is provided, then there may be an increasing demand for social and private rented accommodation. This may have an impact on those who require affordable housing to rent and cannot afford to buy in the open market. Although there has not been a recent national assessment of supply and demand in Wales, local authorities' own Housing Needs Analyses indicate the need for more affordable housing units.
7. There is concern among statutory and independent sector organisations, that problems with the supply of housing are not sufficiently addressed in the objectives, and that prevention and support services alone will not stop homelessness or reduce the numbers significantly.

8. The Assembly Government is aware of these risks. Work is taking place to increase the supply of affordable housing, in particular, through the National Housing Strategy and the recently published Affordable Housing Toolkit.

The National Homelessness Strategy has encouraged a more joined-up approach to preventing homelessness. Further progress is needed to improve co-ordination and local delivery

9. The Strategy encourages a more joined-up approach to preventing homelessness, recognising that a partnership approach is needed. The Assembly Government has taken steps to ensure that the principles of the Strategy are implemented across its own departments, but some Assembly Government officials told us that that this was not yet comprehensive. They knew their work was relevant to preventing homelessness, but, with varying timescales for the production of strategies, policies and guidance, were unsure of how they contributed towards addressing homelessness. The Assembly Government continues to work towards improving this position.
10. The Strategy sets out a series of actions it expects other organisations to take that can help prevent homelessness. These organisations include UK Government departments and agencies, such as the Department of Work and Pensions (DWP), and Jobcentre Plus, as well as Assembly Sponsored Public Bodies (ASPB), local authorities and independent providers. This widespread partnership approach is commendable and reflects the complexity and diversity of responses that are required to prevent homelessness. However,



the Assembly Government has a variable degree of influence over these organisations, and the delivery of these expectations in the Strategy will depend on good partnership working and commitment, supported by regular monitoring and effective evaluation.

- 11.** As part of its partnership approach to preventing homelessness, the Assembly Government has successfully engaged with local authorities and the independent sector to promote and gather support for the Strategy. Our survey of local authorities showed they were broadly supportive, with 13 per cent saying the Strategy will prevent homelessness and 81 per cent saying it will partly prevent homelessness. The Assembly Government is involving representatives from statutory and independent organisations in developing policies and actions that will flow from the Strategy. The Assembly Government also has a programme of progress visits to local authorities which commenced in January 2006. This detailed engagement should help improve and develop local actions, but, ultimately, action will depend on local authorities' own priorities and resources. Some local authorities have made progress.
- 12.** In support of the Strategy, the Assembly Government is providing a range of support for local prevention services. The Strategy sets out a clear overarching framework for prevention services, and this is supported by more detailed recommendations outlined in a report commissioned by the Assembly Government from Tarki Technology Consultancy (the report has been issued to all local authorities). Through the Strategy, the Assembly Government builds on its existing advice note on preventing homelessness, issued in

2004. It published further guidance in autumn 2006, to support the development of a local homelessness strategy within the Local Housing Strategy. The Assembly Government has introduced legislation, and is providing financial support to improve the quality of temporary accommodation, and reduce the use of bed and breakfast. It is also providing grants to local authorities and independent organisations, to support a range of projects that can contribute to the prevention of homelessness.

- 13.** Local authorities are making progress in implementing the Strategy, but some services are still an early stage of development. The Strategy notes that existing local homelessness strategies, developed under the 2002 Homelessness Act, had already led to improved partnership working. Most local authorities have developed homelessness partnership forums that they consider to be effective, and most say they are working in partnership to provide services. However, although the partnership approach was well established, we found that many local prevention services were still at an early stage of development and in need of further progress. In particular:
 - Advice services are a key part of the Strategy's focus on prevention, and while all local authorities are keen to develop homelessness and housing advice services, some have not yet done so.
 - Not all local authorities were making progress in other preventative services, in line with the Strategy's recommendations. While some local authorities support local mediation services, have introduced 'spend-to-save'¹ initiatives to support people in

¹ 'Spend-to-save' involves the local authority making a relatively small spend to save more in the future, for example, helping somebody to pay rent arrears can save the future costs of having to rehouse and resettle that person if they are evicted.

financial difficulties and have appointed a homelessness champion, progress was slower in other local authorities, with a number saying that they were waiting for the revised Code of Guidance from the Assembly Government that was due to be published in November 2006.

14. The 'Supporting People' programme plays an important role in helping people with particular support needs to live in the community, thus preventing homelessness. For example, the programme helps prevent both first time and repeat homelessness by enabling people to manage their tenancies. The Strategy calls on local authorities and their partners to review their priorities for using their Supporting People resources to support prevention. In particular, local authorities can remodel Supporting People services to meet changing needs, and 11 have applied to do so. However, there are concerns expressed by local authorities and independent service providers that remodelling is difficult in the context of the 11.5 per cent (£16 million) reduction in funding made in 2004/2005. As cuts in services would involve changes to services for vulnerable people, the Assembly Government made a contribution of £5 million in 2006/2007 and lessened the impact of the funding reduction. There is also concern that strategic planning, audit and review are complicated by split responsibilities in funding of the programme between the Assembly Government and local authorities. The Assembly Government and the Welsh Local Government Association (WLGA) have formed a working group, looking at the future distribution of Supporting People funding.

The evaluation of the National Homelessness Strategy, policy and services needs strengthening

15. The Assembly Government intends to measure and monitor progress in delivering the Strategy, although this will be challenging. There is currently no national measure to assess the outcomes of prevention work, which is a key priority of the Strategy. There was concern among representatives of statutory and independent organisations that a planned performance indicator for prevention had been dropped in 2005/2006. Further work on the definition of a prevention indicator has been undertaken and it is now being consulted on. It will be essential to introduce it from April 2007, or the Assembly Government will not be able to evaluate the prevention work of its Strategy.
16. The Strategy sets out 10 objectives, of which four have clear targets and two are due to be developed during 2006/2007. Evaluating the extent to which the Strategy's objectives are being delivered will be difficult, especially where the objectives involve outcomes without quantifiable targets, for example, on better service planning. The Assembly Government also plans to monitor the delivery of actions it 'expects' other organisations to deliver. It intends to start this exercise by contacting those organisations towards the end of 2006, a year after the introduction of the Strategy.
17. Performance by local authority homelessness services is reported nationally. Evaluation of this information needs to be improved and should include an assessment of whether a focus on prevention is having an impact on reducing homelessness.



18. The Assembly Government has put systems in place to evaluate grant-funded schemes, but recognises that further development is needed. It provides £6.3 million annually to support independent sector and local authority schemes. There is an intention to change the focus of monitoring of these grant-funded schemes towards an assessment of impact. The Assembly Government also recognises that, in line with the Making the Connections agenda, it needs to improve its evaluation of the impact of schemes on users.

Recommendations

1. Accurate data is important if the Assembly Government and its partners are to build a full picture of the scale and nature of homelessness, and to develop evidence-based solutions for the future. Statistics suggest that homelessness is reducing, but this may not tell the full story and does not predict the future scale of homelessness. A number of people without homes do not present to their local authorities, although the full scale of this remains unknown. Also, many people who enquire about their housing options, do not reach the stage of requiring a decision, and there is wide variation in the methods used to record such enquiries, making comparison difficult. We recommend that the Assembly Government and local authorities improve their measurement of homelessness by:
 - using information collected in local housing market needs assessments, due from local authorities by April 2007;
 - promoting the correct application of the national definition of what counts as an 'enquiry' for the purposes of the reported homelessness data; and
 - measuring and reporting, on a consistent, national basis, the outcomes for all people who make a homelessness enquiry through use of the proposed prevention indicator from April 2007.
2. The Strategy recognises that the supply of affordable accommodation is a prerequisite to preventing homelessness. An understanding of supply and demand is essential when developing policies to prevent homelessness. We recommend that, in order to develop its evidence-based approach to preventing homelessness, the Assembly Government should examine, in detail, the relationship between the use of the social and private rented sector, the supply of affordable accommodation and homelessness by:
 - collating statistical information on local demand (by using the housing registers) and capacity in the social rented sector, to provide a national picture of housing need and supply;
 - commissioning or carrying out research on the relationship between homelessness and affordable housing; and
 - assessing the capacity of the private rented sector to continue accommodating people with a general housing need while increasing access for homeless people.
3. Preventing homelessness is a complex challenge that requires the support and involvement of several Assembly Government departments. There has been welcome progress in integrating the principles of the Strategy across Assembly Government departments, but in some key areas, officials are still unsure where their contribution fits in the overall

Strategy. We recommend that the Assembly Government homelessness team carry out extensive internal awareness-raising, through, for example, involvement in key strategic working groups in other departments, and by holding internal workshops and seminars.

4. Local authorities are often the first point of contact for advice on homelessness. However, their advice services are generally not well-developed and are of variable quality. We recommend that the Assembly Government work closely with local authorities and independent organisations to identify local approaches to providing high-quality, efficient and joined-up advice services to homeless and potentially homeless people.
5. The Supporting People programme can play an important part in helping prevent homelessness. However, due to the legacy of schemes, it is not currently structured strategically to meet identified need. The Assembly Government is working with local authorities to promote strategic commissioning linked to local Homelessness Strategy priorities. We recommend that the Assembly Government continue to support local authorities and independent providers to make Supporting People schemes part of a clear, local, strategic framework which is based on identified need.
6. The Assembly Government recognises that improvements are needed in the way it monitors and evaluates the Strategy, and the actions that support it. These improvements need to be implemented within a tight timescale, as the Strategy only covers the period 2006-2008. We recommend that the Assembly Government should implement plans to develop and implement robust procedures for evaluating:

- progress against all of the Strategy's objectives;

- progress against the actions it 'expects' other organisations to implement;
- the impact and quality of homelessness services it funds directly;
- the impact and quality of local authority prevention services; and
- the adequacy of services from the users' perspective.



1. The downward trend in homelessness is positive but is not conclusive

1.1 Homelessness is complex and there are many different definitions and ways of measuring the problem. Accurate measurement of the nature and scale of homelessness is important, if the Assembly Government and its agencies are to understand the problem and plan appropriate responses. This part of the report examines recent trends in homelessness in Wales, in particular, it examines whether:

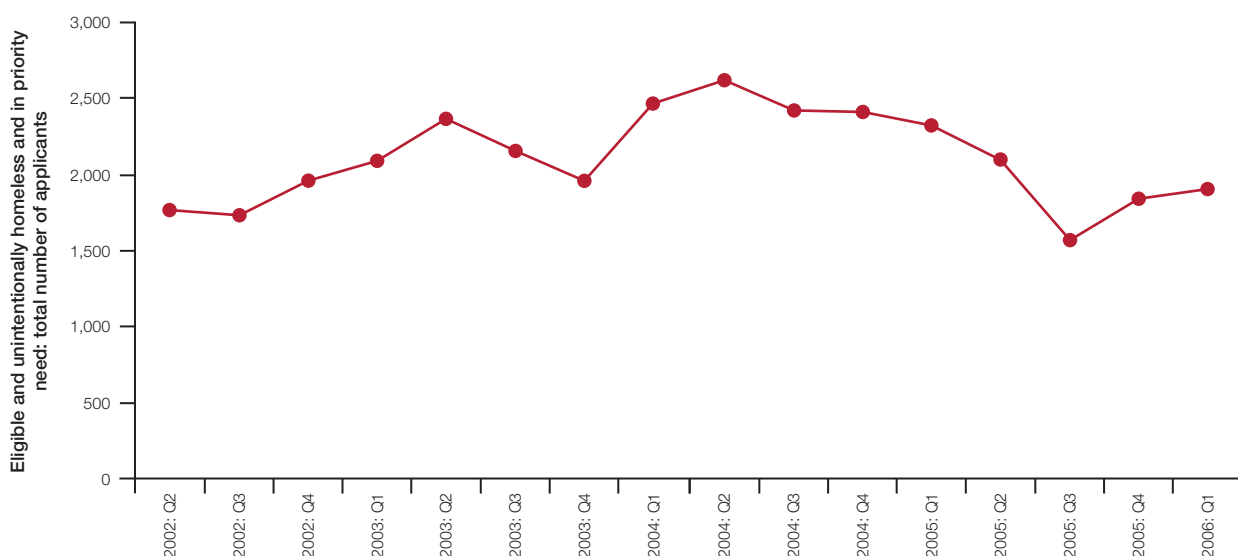
- homelessness has reduced since the development and introduction of the Strategy; and
- the statistics fully reflect the true picture of homelessness in Wales.

Statistics suggest that homelessness is decreasing

Acceptances are down

1.2 Figure 1 shows that the total number of households accepted as unintentionally homeless fell from a high of 2,600 in the three months to September 2004, to 1,898 in the three months to the end of June 2006. This fall coincided with the period in which the Strategy was being developed and consulted on and the time since its launch, and follows a period of sustained increases from July 2002 until September 2005.

Figure 1: Number of households accepted as unintentionally homeless and in priority need



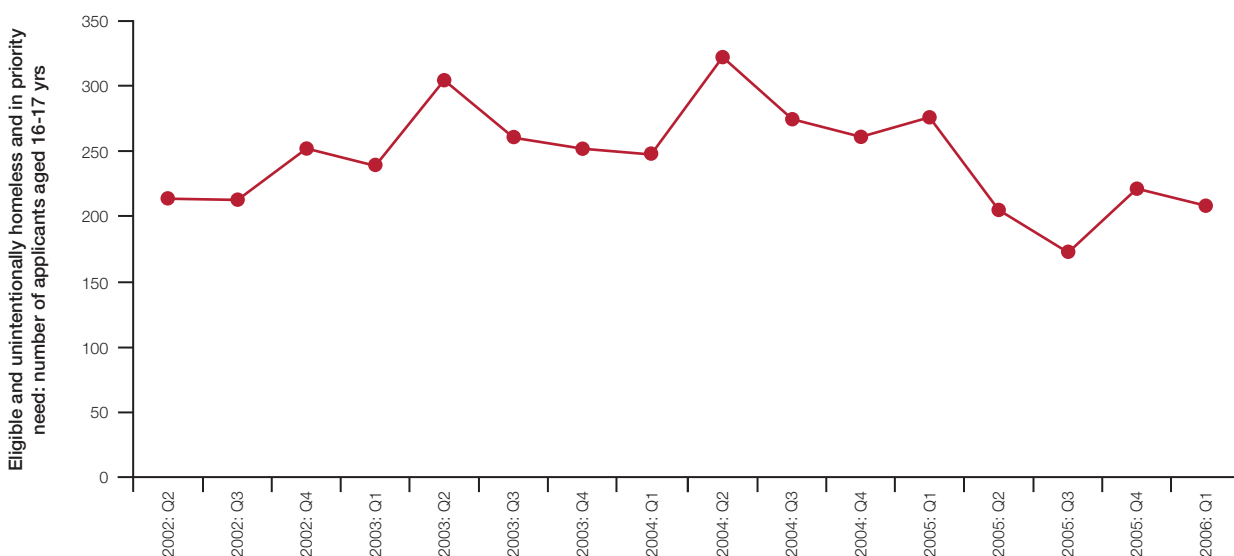
Source: WHO12 Local Authority returns to the Local Government Data Unit and the Assembly Government

- 1.3** As part of the downward trend, there has been a welcome reduction in homelessness amongst 16-17 year olds, who, our survey showed, were one of the most difficult groups to house. **Figure 2** shows that there has been a decrease in the number of 16-17 year olds accepted as unintentionally homeless, from a high of 322 in the quarter to September 2004, to a low of 172 in the quarter to December 2005, with a rise to 208 in the first financial quarter, April to June of 2006/2007.
- 1.4** There has been a similar trend in the reduction of the number of decisions made by local authorities to determine whether a person is statutorily homeless. In 2004/2005, 22,580 decisions were made; this represented a peak, following sustained increases from 13,950 decisions in 1998/1999. In 2005/2006, there were 18,593 decisions - an 18 per cent reduction on the 2004/2005 levels. This is perhaps the strongest indicator of prevention

being a success, as it shows a reduction in the number of people reaching the stage where a decision needs to be taken.

- 1.5** However, there has only been a very small reduction in the percentage of applicants accepted as unintentionally homeless and in priority need following submission of a homeless application and investigation; from 43 per cent in 2004/2005 to 42 per cent in 2005/2006. As the number of decisions made has decreased, the number of people accepted as unintentionally homeless and in priority need has decreased. This may suggest that prevention services can successfully prevent homelessness at a point prior to submission of a homeless application, but success is limited once an application is accepted and investigated.

Figure 2: 16-17 year olds accepted as unintentionally homeless and in priority need



Source: WHO12 Local Authority returns to the Local Government Data Unit and the Assembly Government



There was an increase between January and June 2006, although it is not clear why this occurred

1.6 Figure 1 shows that there was a 17.8 per cent increase in the total number of people accepted as homeless and in priority need in the three months to March 2006, rising from 1,560 at the end of December 2005, to 1,838. There was a further increase of 3.2 per cent from April to June 2006. The reasons behind these increases are not apparent over such a short period, and the success of the Strategy will need to be assessed within the context of future quarterly results.

The statistics may not tell the whole story

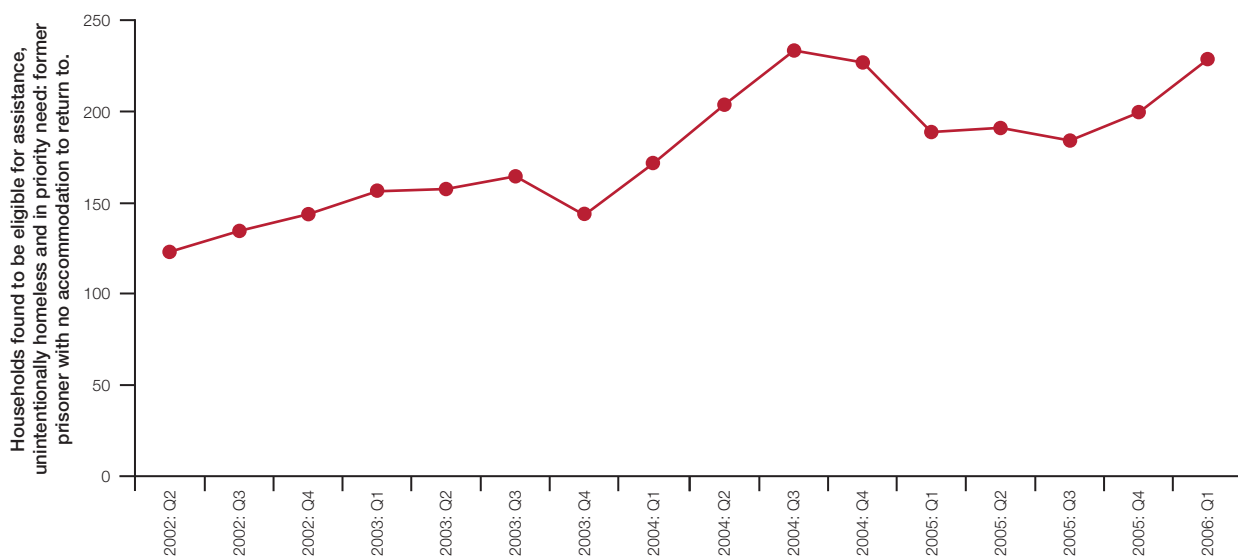
1.7 However, the homelessness figures reported above do not necessarily provide a full or accurate picture of the level of homelessness at any given time. They include only those people who have been accepted by local authorities as

unintentionally homeless and in priority need. They do not identify the numbers of people who do not present themselves as homeless. It is therefore very difficult to quantify the scale of homelessness in Wales. This section considers some of the complex issues of homelessness.

Not all homeless people present themselves as homeless to the local authority

1.8 Not all people who find themselves homeless present themselves to the local authorities. This group of people may include those who are evicted, and those who abandon or lose their home through family break-up, mortgage arrears and debt. In 2004/2005, 1,215 families in Wales left social housing following an order for repossession (almost all of these were due to rent arrears). Only 253 households in Wales were recorded as statutorily homeless because they had lost their previous property due to rent arrears. Nine hundred and twenty-six families will have had to find alternative accommodation.

Figure 3: Prison leavers accepted as unintentionally homeless and in priority need



Source: WHO12 Local Authority returns to the Local Government Data Unit and the Assembly Government

1.9 Prison Link Cymru has identified a concern that 40 per cent of prisoners who are in need of housing still fail to present themselves to local authorities on discharge. **Figure 3** shows there was a downward trend in acceptances among prison leavers, falling from a high of 233 in the quarter to December 2004, to 183 in the quarter to December 2005. However, in the following six months from January to June 2006 acceptances increased back to the December 2004 level and are considerably higher than in 2002/2003. These figures need to be compared with the numbers of prisoners who are discharged with no accommodation to return to.

1.10 Not all people who find themselves homeless are accepted as statutorily homeless. In 2004/2005, some 5,319 people were accepted as being homeless but were not in priority need, meaning they did not fall into one of the statutorily defined 'vulnerable' groups who should be assisted. A further 953 households, judged to be homeless and in priority need, were found to have intentionally put themselves in that position.

1.11 Additionally, not all decisions taken on whether a household is unintentionally homeless and in priority need are correct. A 2006 report by the Public Services Ombudsman for Wales highlighted major problems with decisions in a number of Welsh local authorities. The Ombudsman concluded that 'a number of complaints received by my office concerning housing allocations and homelessness issues, have revealed a widespread problem with how such applications are dealt with. A significant number of the 22 Welsh local authorities have failed to introduce housing allocation, and homelessness policies and procedures that implement, in practice, the relevant legislative requirements, in particular, those introduced by

the Homelessness Act 2002'. Shelter Cymru also reported concerns about the quality of decisions being taken by local authorities, and has helped many homeless people successfully appeal against their decision. However, given the level of concern and the problems highlighted by the Ombudsman, it is possible that, in a number of cases, people have not challenged decisions that were possibly wrong. As part of preventing homelessness, it will be important to ensure that the revised Code of Guidance is produced and implemented in all local authorities.

The number of people enquiring about housing options has remained constant

1.12 The number of people recorded by local authority homelessness teams as enquiring about their housing options has remained reasonably constant. During the period December to March 2006, the total number of people enquiring about homelessness rose from 5,592 to 6,454 and down to 5,912 in the quarter April to June. However, due to local interpretation of an enquiry, local authorities have developed different approaches to classifying and recording enquiries about homelessness. For example, between October and December 2005, one medium-sized local authority reported that around 1,300 people had sought advice on homelessness, but two larger local authorities reported 540 and 336 enquiries.

1.13 This inconsistency means it is difficult to assess whether the reduction in decisions and the corresponding reduction in acceptances reflects a real reduction in homelessness through prevention work or whether by defining homelessness differently and preventing people from presenting as homeless local authorities are effectively gatekeeping access to services.



The Assembly Government has recognised this uncertainty within the Tarki Technology report. Although there is no evidence of gatekeeping rather than prevention, clearer guidance is required and is currently in draft. More effective monitoring of applications is also required.

The numbers in temporary accommodation have marginally increased, while those in bed and breakfast accommodation have decreased

- 1.14** Although the number of people accepted as homeless has reduced, the number of people in temporary accommodation who have not moved on to a permanent home has not reduced to the same extent. Local authorities are required to provide those that they accept as statutorily homeless with temporary accommodation, until a permanent home is available. It is only when a permanent home is available that the local authority can discharge its duty to the homeless person.
- 1.15** Local authorities are being encouraged not to use bed and breakfast accommodation. Bed and breakfast is widely regarded as an expensive and unsuitable form of accommodation for homeless people, and therefore, there is a need to find other forms of temporary accommodation from the social or private rented sectors. Between October 2005 and the end of June 2006 there was a reduction in the number of households placed in bed and breakfast from 744 to 498.
- 1.16** Although increasing access to alternative forms of temporary accommodation has welcome benefits for homeless people, this trend can cause long-term problems for other people in general housing need. From March 2002 to March 2006, the number of local

authority permanent homes used as temporary accommodation increased from 352 to 541. Where local authorities use their own permanent housing as temporary accommodation, this reduces the stock of accommodation that is available and may be to the detriment of applicants on the local authority housing register.

The impact of the use of private rented accommodation by homeless people needs to be researched

- 1.17** The Assembly Government is working to secure greater access to the private rented sector for homeless people and is proposing to set up a task and finish group to pursue this goal. Such an approach could help secure better-quality accommodation for homeless people who would otherwise be housed in bed and breakfast. Due to the limited availability of affordable private rented accommodation, the approach may result in an increase in people seeking accommodation from local authorities. The Assembly Government has commissioned Shelter Cymru to carry out research into accessing private sector homes in Carmarthen and Wrexham and the links with homelessness, to assist in determining the potential capacity of the sector and impact of this approach.

The proportion of social rented lettings to homeless people has increased

- 1.18** During the period when the number of people accepted as homeless was increasing, the number of social rented permanent lettings to homeless people increased from 2,220 in 2001/2002, to 3,299 in 2004/2005. However, at the same time as lettings to homeless people have risen, the total number of social housing lettings has been reducing. Due, in part, to a reduction in available stock

because of the Right to Buy Scheme², lettings to council homes fell from 14,489 in 2001/2002, to 11,196 in 2004/2005. Housing associations' lettings also reduced from 6,132 in 2003/2004, to 5,885 in 2004/2005.

1.19 This may create a bottleneck for people who are not homeless but want or need social rented accommodation. It may also increase the risk that they become homeless if they are unable to meet their housing needs through an allocation via the housing register. More research is needed in this area.

The Assembly Government has been working to increase the supply of affordable housing, but supply still does not meet need

1.20 Local evidence suggests that there is an imbalance between supply and demand for affordable accommodation to purchase and rent which may lead to future increases in homelessness. The Strategy recognises that 'an adequate supply of affordable housing is a prerequisite for tackling homelessness', but does not include this as an objective. Many independent sector organisations and local authorities told us they believed this was a major omission from the Strategy. The Assembly Government believes that, because it is a wider issue, affordable housing is better addressed as part of the National Housing Strategy, rather than as part of the Homelessness Strategy.

1.21 The Assembly Government has been working to increase the supply of affordable housing, in particular, it has published an Affordable Housing Toolkit which:

- provides new guidance on using land for affordable housing;
- provides guidance on housing market assessments;
- makes revisions to its planning advice notes, which require local authorities to include an affordable housing target in the Development Plan and set out how that will be delivered;
- removes restrictions on procedures for the disposal of land for affordable housing, so that local authorities can dispose of land up to a value of £2 million in any one year for affordable housing, without the Assembly Government's approval; and
- sets out a process for the use of land the Assembly Government owns to be disposed of for affordable housing.

1.22 The Assembly Government provides funding through the Social Housing Grant, for construction of new affordable social housing. However, there is concern that housing associations are unable to meet the demand for affordable units. For example, Cardiff's Local Housing Strategy says that the Social Housing Grant is over-subscribed and identifies a shortfall of more than 2,500 units per year.

1.23 There are no all-Wales figures on the shortfall in affordable housing. However, local authorities have provided evidence that need currently outstrips supply. For example, in 2004/2005, there were over 8,000 applicants on the housing register for local authority accommodation in Cardiff, but just 1,230 lettings.

² The Right to Buy Scheme gives tenants the right to purchase the home they rent from the local authority. Between 1980 and September 2005, 132,500 properties in Wales were sold under the Right to Buy.



Local practices on evictions and exclusions can increase levels of homelessness

- 1.24** Of the 1,215 families who left social housing in 2004/2005 following a possession order for rent arrears or anti-social behaviour, 1,069 were from local authority accommodation. Inevitably, a proportion of those who lost their homes are likely to present themselves to the local authority as homeless and require rehousing. Many of these would be classed as intentionally homeless and would not be accepted as statutorily homeless, hence secure rehousing. In some cases, local policies to manage rent arrears and tackle anti-social behaviour may contribute towards homelessness, although this may be unavoidable in some cases. Such people may benefit from further support to help them sustain their tenancy and therefore prevent homelessness.
- 1.25** In addition, our survey found that approximately 70 per cent of local authorities exclude or suspend certain groups from their housing waiting lists, usually those that are likely to present management difficulties, either because of anti-social behaviour or previous problems with rent arrears. Legislation governing this matter prohibits blanket exclusions, as each case has to be decided on its own merits. It allows for 'suspensions' where the individual has displayed 'unacceptable behaviour', which requires that three tests be met. The Public Service Ombudsman for Wales's 2006 report showed that some local authorities in Wales were not complying with their statutory obligations in this regard.

2. The National Homelessness Strategy has encouraged a more joined-up approach to preventing homelessness. Further progress is needed to improve co-ordination and local delivery

2.1 The Assembly Government's Strategy is ambitious. As discussed in Section 1, homelessness has a complex array of causes and potential solutions that cut across policy areas and organisational boundaries. A variety of stakeholders are involved in preventing homelessness, with the Assembly Government taking a lead strategic role, and local authorities, voluntary groups and housing associations responsible for the main day-to-day delivery of services. This part of the report examines whether the Strategy is well placed to deliver the co-ordinated approach required to prevent homelessness.

The Welsh Assembly Government has taken steps to integrate the principles of the National Homelessness Strategy into its wider work. Further progress is needed

The Welsh Assembly Government has included homelessness and the provision of accommodation in strategy development in key social policy areas

2.2 The Assembly Government aims to ensure complementary strategic development, and the Housing Directorate's vision is to work with other departments of the Assembly Government to tackle homelessness as part of other key strategies and actions. [Figure 4](#) shows a number of examples of evolving complementary strategic development.

There are concerns that joined-up working towards preventing homelessness is not yet fully developed

2.3 Although the Assembly Government has taken steps to integrate its Strategy across a range of subject and policy areas, there is concern that this is not yet comprehensive. Some Assembly Government officials working on key issues relevant to the prevention of homelessness were not clear on how their work fitted within the Strategy, nor were they sure how the Strategy impacted on their work. The Housing Directorate consulted policy leads in each area when the Strategy was being developed, but since it was finalised, some have had no further involvement.



Figure 4: Examples of the Strategy's principles being mainstreamed across the Assembly Government

Subject	Description
Substance misuse	Homelessness is a key part of the Substance Misuse Framework.
Ethnic Minorities	The Selected Minorities Group is undertaking research on health and homelessness.
Social care	The National Homelessness Strategy Working Group met social care teams to discuss the Strategy, and Social Services action on homelessness is being included in the annual Performance Evaluation by Social Services Inspectorate Wales.
Domestic abuse	The Domestic Abuse Working Group has highlighted move-on accommodation as a priority.
Young people	Extending entitlement guidance to local young people's partnerships requires them to develop strategies for addressing young people's housing needs.
Offenders	A specific accommodation pathway has been included in the Reducing Re-offending Action Plan.
Health	A Health and Homeless Facilitator is to be appointed as a two-year secondment, jointly funded by the Health and Housing departments. Service development and commissioning guidance for Local Health Boards (LHBs) and NHS trusts to address the needs of selected minorities, including the homeless, was disseminated in summer 2006.

The National Homelessness Strategy places expectations on a wide range of organisations that can help prevent homelessness. The Welsh Assembly Government has variable influence in ensuring those expectations are delivered

2.4 The Strategy acknowledges that many of the key elements involved in preventing homelessness require action by other organisations, stating, 'homelessness can only be tackled successfully through a full commitment to joint working from other departments, organisations and related services areas, such as health and social services'. To this end, the Strategy sets out 80 actions that it 'expects' other organisations to deliver. **Figure 5** provides examples of these expectations and the organisations targeted.

2.5 Although the Strategy sets out what it expects from these organisations, the Assembly Government has variable influence in ensuring that those expectations are delivered. These organisations set their own priorities and objectives and decide the level of resources to commit to pursuing the Strategy. The Assembly Government has influence in some areas, through conditions attached to its funding and through policy agreements, but its influence is less direct in the case of organisations such as the DWP and Jobcentre Plus. Consequently, the successful delivery of the Strategy, through the realisation of its expectations, will require a high degree of partnership working and shared commitment to the principles and substance of the Strategy. It will also require effective monitoring and evaluation by the Assembly Government, which, at present, is evolving (**Part 3**).

Figure 5: Expectations placed on organisations in the Strategy

Expectations	
Local authorities	The Strategy places the highest number of expectations on local authorities, in areas that include: <ul style="list-style-type: none"> • rough sleeping; • advice; • staff training; • Social Services; and • the quality of accommodation.
Independent sector	Various expectations are placed on housing associations in relation to, for example, support, exclusions and evictions, and joint working. Voluntary organisations are expected to reflect a focus on prevention in their strategies and work in partnership with local authorities.
Local Health Boards	Local Health Boards are expected to work with local authorities on Health, Social Care and Wellbeing (HSCWB) strategies, and help plan homelessness services.
United Kingdom (UK) Government and agencies	The UK Government is expected to involve the Assembly Government in any relevant legislation concerning Wales. The DWP, Job Centre Plus and the Basic Skills Agency are expected to provide a focus and resources to address the needs of homeless people.

The Welsh Assembly Government has engaged with local authorities and the independent sector to raise awareness and generate support for its National Homelessness Strategy

Local authorities and the independent sector have broadly welcomed the focus on prevention in the National Homelessness Strategy

2.6 All local authorities and housing associations were consulted on the Strategy while it was being developed. Our survey showed that more than 90 per cent of local authorities believed that the Strategy would at least partly prevent homelessness. Around a quarter of

housing associations said that the targets in the Strategy were achievable, with a further 70 per cent believing they were partly achievable.

2.7 The vast majority of local authorities and housing associations who responded to our survey recognised preventing homelessness as the focus of the Strategy. However, there is clearly some concern about the comprehensiveness of the Strategy. Half of local authorities believed that the Strategy should incorporate other objectives, in particular, a focus on increasing housing supply.

2.8 Independent sector advice and advocacy organisations were also broadly welcoming of the focus on prevention. There was concern that the emphasis on prevention may encourage some local authorities to become increasingly focused on ‘gatekeeping’ by more narrowly



interpreting legislation and reducing the proportion of applicants that are accepted as unintentionally homeless and in priority need. The Housing Directorate has given clear messages that prevention should not be through gatekeeping, and there is an intention to reinforce this within a revised Code of Guidance.

The Welsh Assembly Government is encouraging wider ownership by involving representatives from umbrella organisations and individual local authorities in the development of policy and monitoring progress

2.9 In developing the Strategy, the Assembly Government set up the National Homelessness Strategy Working Group, which includes a range of organisations, such as local authorities and umbrella organisations that represent independent sector organisations. This group continues to meet on a quarterly basis, and receives progress updates from Assembly Government officials on those actions the Assembly Government is responsible for delivering. The group is also involved in helping the Assembly Government to develop guidance it intends to issue to support the Strategy.

The Welsh Assembly Government has an awareness-raising programme of progress visits to local authorities

2.10 The Assembly Government set up a programme of progress visits to each local authority which commenced in January 2006 and were spread across the year. The purpose of these visits is to raise awareness of the Strategy, in particular, the Prevention Agenda, to assess progress and to discuss barriers to remodelling services. At the end of the visit, each local authority is provided with a report, setting out

recommendations designed to improve local prevention services, awareness-raising, and the sharing of practice and experience will continue.

As part of the National Homeless Strategy, the Welsh Assembly Government is providing support to improve local preventative services

The Welsh Assembly Government is providing support for local services through the provision of guidance, legislation and resources

2.11 The Strategy provides a clear, strategic framework for local preventative services and builds on Assembly Government guidance on prevention, issued in 2004. It provides a high-level assessment of the key problems and identifies the main subject areas where further action is needed, namely:

- advice;
- social security benefits;
- repossession and evictions;
- children and young people;
- education; and
- mediation.

2.12 Although the Strategy does not set out a detailed picture of how local prevention services should be delivered, it endorses a series of more detailed recommendations made in a report by consultants Tarki Technology. This report is based on a number of service reviews funded by the Assembly Government based on methodology used by the Office of the Deputy Prime Minister in England. It has been issued to all local authorities, and the

Strategy says that it will need to be considered by all authorities in planning their services. The report's recommendations include:

- the need for a local authority homelessness champion to be nominated from among councillors;
- use of a spend-to-save approach and a specific budget for prevention;
- better training for local authority staff; and
- refocusing of homelessness teams on housing options and advice.

2.13 The Assembly Government published new guidance for local housing strategies in November 2006. This includes a requirement to address homelessness by:

- involving other statutory and independent partners;
- prevention, support, securing accommodation and tackling repeat homelessness; and
- requirements for a detailed housing market assessment.

2.14 The Assembly Government is in the early stages of ensuring that homelessness is a corporate priority in local authorities, by issuing revised guidance on HSCWB strategies and community strategies. Subject to ministerial approval, it is intended that this guidance will recommend reference to homelessness in these key local authority planning documents. We are unable to confirm the coverage or effectiveness of guidance at the time of this study.

2.15 The Assembly Government has introduced secondary legislation, placing restrictions on the amount of time homeless people spend in bed and breakfast accommodation. This sets minimum standards for the quality of temporary accommodation. The legislation has a phased implementation from April 2006 to April 2008, and it is clear that local authorities will need to undertake significant work to meet the requirements of the legislation. Our survey showed that local authorities believed that only some of their bed and breakfast accommodation met the Assembly Government's standards.

2.16 The Assembly Government has introduced local policy agreements, in place for 2004-2007, on the use of bed and breakfast, and time spent in temporary accommodation, with specific targets for each local authority. The policy agreements reward achievement of targets by local authorities, and in 2004/2005, a total of £30 million was distributed to local authorities on delivery of their targets.

2.17 The Assembly Government wants to improve access to private sector housing to be used as temporary accommodation ([Paragraph 1.17](#)). Through the Private Sector Leasing Subsidy, local authorities can secure private accommodation as an alternative to bed and breakfast. However, there is concern among some local authorities that the Housing Revenue Account Leasing Subsidy Scheme is very complex. Some find the guidance difficult to follow, and although there are some local authorities which are successfully using the subsidy, the complexity has deterred others from making full use of this funding.



2.18 In order to promote good practice and develop more innovative prevention services, the Assembly Government funds a range of prevention and good practice activities using a variety of funding programmes: the Prevention and Temporary Accommodation Grant Programme, Good Practice Grant, Research Innovation Fund, Section 180 grants and the Social Housing Management Grant. The Assembly Government's main funding stream for homelessness services are 'Section 180' grants, which are focussed on homelessness and rough sleeping. This funding, of £5 million in 2005/2006, is primarily to voluntary sector groups and includes prevention services, such as advice projects and research schemes. Examples of activities, supported by this funding, include:

- a Learning Exchange event, led by the WLGA and some local authorities;
- a good practice toolkit, currently being developed by the WLGA;
- research into barriers to use of the private rented sector being carried out by Shelter in two local authority areas; and
- a review of local authority allocation schemes to ensure they are not used to exclude groups of potentially homeless people, currently being carried out by Shelter.

2.19 These funding programmes have been introduced at different times to support different priorities, but overall, they support the prevention of homelessness and the Strategy's policy direction. Our survey of housing associations suggests that some do not think this funding is sufficiently focused on the goal of preventing homelessness. Our survey showed that

housing associations were more confident that Section 180 grants were focused on prevention than were good practice grants.

Local authorities are making progress. Some services need further development

Many local authorities are developing joint working and co-ordinating local approaches to the prevention of homelessness, in line with the National Homeless Strategy

2.20 The Strategy says that local joint working and co-ordination are essential to provide effective prevention services. It notes that previous local homelessness strategies, produced under the Homelessness Act 2002, had led to improved partnership working. This is supported by our survey, which found that 88 per cent of local authorities had a local homelessness forum, made up of a variety of organisations that can contribute to preventing homelessness or providing services for the homeless. Three quarters of local authorities said that they believed them to be effective. However, there is clear scope for developing the monitoring roles of these forums; fewer than 20 per cent of local authorities agreed that their housing forums monitor and evaluate activity to prevent homelessness.

Local authority advice services are still under-developed, although independent housing advice services are more developed

2.21 The Strategy identifies advice services as crucial in helping to prevent and manage homelessness. The term 'advice' covers a wide range of activities, ranging from responding to basic queries and requests for information, to detailed support on complex matters of housing law and policy. Local authorities are often the first point of call for many people at risk of being homeless. A 2003 report by Shelter revealed serious deficiencies in the frontline advice services provided by local authorities, and a follow-up report in 2005 showed that while some local authorities had made progress in general, the level of service had decreased since 2003.

2.22 Our survey showed that 88 per cent of local authorities believed that their advice services need improvement to provide a comprehensive first point of contact service. Resources seem to be a particular issue, with less than a third of local authorities saying they have sufficient staff to provide advice and prevention services to homeless and potentially homeless people. The quality of available information is variable; only around half of local authorities' housing advice information on their website included details of homelessness services, and although 88 per cent said they were developing advice services with partners, only 25 per cent said their information referred to other advice services.

2.23 Voluntary organisations provide a range of detailed and technical advice services, as well as support and advocacy, such as helping people to challenge local authority decisions. However, some people in the sector are concerned that these agencies, effectively, compete for resources and clients, and that this may not be the most efficient use of resources.

Many local authorities have started to develop prevention services in line with the National Homeless Strategy's recommendations, although some are waiting for further guidance

2.24 Some local authorities are making progress in implementing the recommendations set out in the Tarki Technology report, which are endorsed by the Strategy ([Paragraph 2.12](#)). For example, a small number of local authorities have 'homeless champions', although we found some concern among local authorities that they were now expected to have a large number of champions for different issues that were deemed to be priorities. Homelessness officers told us that the issue had recently assumed a greater degree of corporate and political priority in local government than it had previously, although this was not reflected in key local strategies, such as the community strategies, of which only 25 per cent referred to homelessness. The Assembly Government recognises that housing has not had a high profile and has invited some housing professionals to be represented on groups involved in developing revised guidance for the Community Planning process.

2.25 There has been variable progress in implementing other prevention services. Some local authorities, have, for example, put spend-to-save schemes in place, which rely on extra money being invested in services on the understanding that savings will be made in the future. Some have provided additional training for staff, although our survey showed that most believe their staff are already sufficiently well-trained. Some local authorities are also reconfiguring their homelessness service to focus on prevention rather than the traditional model of homelessness casework.



2.26 The majority of local authorities have not updated their local homelessness strategies to reflect the new focus on prevention set out in the revised National Homelessness Strategy. A number of local authorities are awaiting further guidance from the Assembly Government before developing their strategies and services. A revised Code of Guidance on allocations and homelessness was due to be issued in November 2006, but has been delayed.

Supporting People helps prevent some people from becoming homeless and supports some who are homeless. Local authorities are concerned about fragmented delivery of the programme

Supporting People money supports a range of services to help prevent homelessness

2.27 Supporting People exists to provide a strategic framework for support services to vulnerable people. Through this, the Assembly Government funds services designed to provide support related to their housing. This covers a wide range of services, such as sheltered housing, and also includes floating support services that can help prevent people from becoming homeless, for example, by assisting young and vulnerable people to manage their tenancies.

Progress in remodelling Supporting People has been variable

2.28 It is acknowledged by the statutory and independent sectors that the establishment of Supporting People projects was not achieved in a strategic manner. In the lead up to the creation of Supporting People, projects were initiated in order to maximise the available funding and create new support services. The legacy funding from the creation of Supporting People has

resulted in a number of projects that do not match current local strategic priorities. Across Wales, approximately 40 per cent of Supporting People users identify homelessness as their 'lead need', but the average spend of a sample of local authorities on homelessness was just nine per cent. This may reflect a mismatch of need with services or the fact that many people who access supported housing have causal needs linked to homelessness, such as substance misuse and domestic abuse needs, and these needs are addressed along with their housing problems in the supported housing setting. The Assembly Government has established a system whereby local authorities identify the need for supported housing through an empirical needs mapping and process. This process enables the identification of longer-term, high-level support, associated with, for example, clients with learning disabilities or mental health problems, as well as shorter-term support relating to current circumstances, such as homelessness.

2.29 Support provided by a learning disability support service is likely to address issues of sustaining a home and the prevention of homelessness. This type of scheme will provide high levels of support. There is also a need, however, for low-level support that focuses on the prevention of homelessness as the 'lead need'. During our investigations, concerns were expressed by local authorities, support providers, probation and umbrella organisations, that insufficient low-level support is provided, although it is their responsibility to plan these services at the local level.

2.30 The Strategy advocates that local authorities remodel their Supporting People services, and 11 have applied to do so. Other local authorities are concerned that this is difficult to do. Supporting People funding was reduced by £16 million between 2004/2005 and 2005/2006, although an extra £5 million was

allocated to Supporting People from Assembly Government funds. Remodelling to meet priorities identified in the Supporting People Operational Plan will require local authorities to cut some funding from existing projects, and to increase efficiency and effectiveness. Remodelling needs to be undertaken sensitively, as while remodelling will follow local strategic priorities, cuts in services providing support to vulnerable service users may have an adverse impact and result in homelessness.

2.31 Allied to concerns about remodelling is concern about local control over the Supporting People budget. Currently, local authorities are required to develop the local strategic framework for Supporting People, but the Assembly Government has retained control over a significant proportion of the budget. Originally, the Assembly Government planned to transfer the budget to local authorities in 2006, to provide unity between strategy and funding. However, a policy decision was made not to transfer the budget, on the basis that the criteria were not met. The Assembly Government has stated that it needs to be satisfied that all local authorities are capable of managing and delivering Supporting People, before it will consider transferring resources to them. The Assembly Government is working with local authorities to identify and promote good practice, and to prepare local authorities for handover. A joint working group between the Assembly Government and the WLGA has been established, to consider the future distribution of Supporting People funding.



3. Evaluation of the National Homelessness Strategy and services needs strengthening

3.1 Monitoring and evaluation are important if the Assembly Government is to ensure that the Strategy is delivered effectively, helping to ensure that expectations are met and that lessons are learned. This part of the report considers whether the Assembly Government has sufficiently robust procedures for monitoring and evaluating progress in implementing the Strategy.

Evaluating the extent to which the National Homelessness Strategy’s objectives are being delivered will be a challenge, especially where the intended outcomes are difficult to quantify

3.2 Figure 6 shows that three of the Strategy’s 10 objectives currently have clear targets, with a further two targets to be introduced once a baseline has been established. The remaining five objectives have no clear targets, and measuring the extent to which these objectives have been met will be challenging. For example, the objective that service planning addresses the causes of homelessness will require organisations to review the way they plan their services. Gathering national data on these changes at a local and organisational level will be difficult, and methods established for gathering this information should be developed.

Figure 6: The Strategy’s objectives and targets

Objective	Target
Services are focused to prevent homelessness wherever possible.	By 2008: <ul style="list-style-type: none"> • prevent homelessness among 50 per cent of households who consider themselves at risk of homelessness; and • reduce the number of homeless households found to be unintentionally homeless and in priority need by 20 per cent from 9,856 in 2004/2005.
People who are homeless, or threatened with homelessness are provided with the information and advice they need to minimise the risk of losing their home or to secure alternative housing.	No target set.

Objective	Target
Repeat homelessness is reduced through constructive interventions which support sustainable solutions.	No target currently set, but a baseline will be established in 2006/2007 to be used for future targets.
Housing legislation is applied correctly and fairly in providing the statutory safety net for those who need it.	No target set.
Emergency accommodation is available as soon as possible so no-one should have to sleep rough.	No target currently set, but a baseline will be established in 2006/2007 to be used for future targets.
Homeless people have access to suitable temporary accommodation.	By 2008: <ul style="list-style-type: none"> • reduce the number of households in bed and breakfast by 50 per cent from 761 in 2004/2005; and • reduce those found to be unintentionally homeless and in priority need by 20 per cent from 9,856 in 2004/2005.
People have to spend as short a time as possible before being able to secure permanent accommodation.	Reduce the average length of time spent in temporary accommodation by 20 per cent from 2004/2005.
The main causes of homelessness are addressed through service planning at local and national level.	No target set.
Access to housing resources in the social and private sectors is maximised to prevent and resolve homelessness.	No target set.
The support and other needs of homeless people are identified and provided for, and agencies work together to aid their sustainable resettlement.	No target set.



3.3 However, there are no processes for monitoring targets for prevention, which is the main focus of the Strategy. In 2005/2006, a proposed homelessness prevention performance indicator, that would be applied to all local authorities, was dropped as part of a wider programme of indicator rationalisation. The decision to drop the indicator has caused concern among some representatives of the statutory and independent sectors. The Assembly Government intends that the prevention indicator should be reinstated and work is currently underway on defining the measure, which needs to be introduced in April 2007 to enable the achievement of the main purpose of the Strategy to be measured.

3.4 In the absence of a prevention indicator, the Assembly Government is reliant on monitoring the number of acceptances and decisions, to assess whether the Strategy is delivering improved prevention. As Part 1 demonstrates, both indicators show a downward trend. However, this is not conclusive evidence that the prevention of homelessness will continue and the numbers of people accepted as statutorily homeless will reduce. Homelessness is affected by wider socio-economic factors, the supply of accommodation, management of homeless presentations, investigations and acceptances, the impact of Supporting People and potential gatekeeping, as well as prevention. It is important to attempt to measure the impact of the various prevention methods being used, for example, spend-to-save schemes.

The Assembly Government monitors the delivery of some of the actions identified in the Strategy that it 'expects' other organisations to deliver

3.5 The Assembly Government monitors the performance of local authorities in meeting targets on temporary accommodation, through the policy agreements it has put in place (Paragraphs 2.4 and 2.5) and intends to monitor the delivery of expectations by other organisations and will write to them.

Systems for the evaluation of prevention schemes are in place, and need further development

3.6 The Assembly Government directly funds a number of homelessness schemes, including some prevention services provided by the independent sector. Some Assembly Government officials and people who attended our focus groups expressed concern that the monitoring of directly funded schemes was not robust. In particular, Assembly Government officials acknowledged that, although monitoring forms were submitted to the Assembly Government by grant recipients, these do not include sufficient outcome measures required for robust assessment. The Assembly Government told us that it plans to strengthen these evaluation arrangements and introduce a three-year review of each service by April 2007.

3.7 The Assembly Government recognises that progress is needed to monitor and evaluate local authority prevention services, especially in the absence of a national performance indicator. Our survey found that 43 per cent of local authorities said they evaluated their local

outcomes against the Assembly Government's national objectives. Although there may be some local evaluation of prevention services, there are no clear mechanisms for this data to be fed to the Assembly Government, nor is there a system for this to be evaluated on a consistent, national basis. The Assembly Government intends that evaluation will form part of the one-off progress visits to local authorities. Plans for formalising this into a longer-term monitoring arrangement will be considered, following the completion of the visits and the outcome of the Local Government Data Unit work on a prevention indicator.

- 3.8** Evaluation of the data on trends and patterns in homelessness, collected for local authorities, needs to include an assessment of whether the approach to reducing homelessness through a focus on prevention will continue to make an impact.
- 3.9** The Strategy refers to Making the Connections, the Assembly Government's overarching strategy for public services in Wales. Making the Connections emphasises the importance of ensuring that public services are citizen and user-focused. The Assembly Government recognises that considerable progress is needed in evaluating services from the perspective of users; this applies to homelessness prevention services as well as other public services. It is promising that 75 per cent of local authorities say they use service users' views to improve their homelessness services, and around two thirds were able to provide specific examples where users' views had directly led to changes. However, from both our own research and Shelter Cymru's, we found that access to information and services is not designed around the needs of the service users. Despite some local progress, there remains a need for a more consistent national approach to incorporating users' views and needs into the evaluation of services, and providing

services that are responsive to the complex needs and circumstances of those who are homeless or who risk being homeless.

- 3.10** The Strategy has a relatively short timeframe, of 2006-2008. Implementing effective and robust monitoring and evaluation systems in this timeframe is particularly ambitious. In particular:

- the Assembly Government will contact organisations to monitor progress against actions it expects they will deliver. Agreeing a robust monitoring and evaluation framework with each organisation is likely to be time-consuming;
- the paragraphs above show that the systems currently in place for evaluating directly funded schemes and local authority services are in need of considerable further development, and the Assembly Government intends to address weaknesses, but the details of these improvements are yet to be finalised; and
- implementation of the Strategy involves a wide range of stakeholders, and many of these will need to provide robust data on which evaluation can be based. Gathering this data on a consistent basis, to enable evaluation of progress at a national level, is always challenging and subject to the timescales and priorities of other organisations.