

Crisis evidence for the Communities and Local Government Select Committee Inquiry: One year on since the introduction of the Homelessness Reduction Act

About Crisis

Crisis, the national charity for homeless people, welcomes the opportunity to contribute to this review into the Homelessness Reduction Act (HRA).

Crisis is dedicated to ending homelessness by delivering life-changing services and campaigning for change. The best way to end homelessness is to prevent it happening in the first place. Where homelessness cannot be prevented we believe it should be brief, rare and non-recurrent.

1. Summary of key findings and recommendations

- 1.1 This briefing draws on a number of different sources of research and other activities that Crisis are currently undertaking to examine and understand the implementation of the Homelessness Reduction Act (HRA). The primary focus of the findings comes from Crisis' In On The Act research, a largescale three year project funded by the Oak Foundation that provides insight into the newly implemented HRA across six local authority areas. The first year research findings are based on 545 surveys and 51 in-depth interviews with people approaching their local authority for assistance and interviews with local authority staff. The briefing is supplemented by practice examples from our work supporting local authorities in developing and delivering best practice on the HRA, draws on evidence from the Newcastle Homelessness Trailblazer, a partnership between Crisis, Newcastle City Council, local job centres and Your Homes Newcastle to identify people at risk of homelessness, and results from the Homelessness Monitor England local authority survey (due for publication May 2019).
- 1.2 Crisis remains extremely supportive of the HRA and through our research and practice work we have seen strong signs of progress, but it has also highlighted the need for national and local government action to address the issues highlighted in this briefing.
- 1.3 In 2014, a Crisis mystery shopping exercise conducted to examine the treatment of single homeless people who approach their local authority for assistance found that there was a widespread problem with the advice and information provided with some turned away without any help or the opportunity to speak to a housing adviser. The new research findings suggest that this has changed substantially since the introduction of the HRA with only 3% of respondents stating they were turned away with no support or advice. **The research findings suggest that this is one of the most substantial changes observed since the introduction of the HRA and that the change in legislation has had a noticeable impact on widening access to single homeless people.**
- 1.4 The HRA has substantially increased the number of people eligible for support from Housing Options through the new prevention and relief duties. This is evidenced in the first quarter of new H-CLIC statutory data and Homelessness Monitor England 2019 (forthcoming) local

authority survey. However, through our research we've found that overall awareness of the HRA is low and the findings suggest that knowledge of changes to the legislation from the position of the applicant have not specifically been a significant motivating factor in the increased number of people approaching Housing Options for assistance.

- 1.5 There are concerns that the intention behind the HRA and the requisite culture change needed to deliver this has not been implemented as anticipated. Where local authorities have embraced the HRA and recognised that it requires a substantial change to their processes and ways of working the reflections from both local authority staff and survey respondents are much more positive. Conversely those local authorities that have attempted to overlay the HRA onto pre-existing practices are finding the implementation of the HRA challenging and this is reflected in the research findings in those areas. More encouragingly well over half of LA respondents (62%) in the Homelessness Monitor England survey saw the HRA as having enabled a 'more person-centred approach', with this response particularly common in London (79%).
- 1.6 Findings from Crisis' 'In on the Act' research and Homelessness Monitor England report show there is variation in practice and the spirit of the HRA is being interpreted and implemented differently in practice. Whilst encouraging that 46% of local authorities in England said the HRA has prompted more effective homelessness prevention work and 58% have introduced new prevention and relief services as a result of the HRA 2017, this shows there is still more work to be done in areas where the HRA has not prompted this action.
- 1.7 Local authorities are mixed in their approach to embracing the HRA and the associated culture change required. In some cases the local authority has re-structured their entire approach – for example, through the creation of new roles and job specifications which have emphasised a coaching model, strengths based and reflective practice - and have acknowledged how different the way of working is required to deliver the HRA. In other examples the local authority has made no changes to their ways of working and are applying the HRA onto previous internal structures.

Local authorities reflected that caseloads that are more aligned with intensive case management practice were more suited to delivering the HRA. This means that those local authorities with particularly high caseloads are finding it challenging to deliver the HRA in the way that it was intended. Conversely local authorities that made significant changes to their caseloads and team structures are finding the HRA to be a more positive experience and are able to better support people approaching for assistance.

The increased administrative duties related to the HRA were highlighted across most of the local authorities as being an additional burden that reduces face to face customer time. However, where this was anticipated and incorporated into new ways of working it appears these concerns have been mitigated. Likewise, some local authorities have been particularly affected by their poor IT infrastructure including both case management systems and their ability to interact with H-CLIC. As with the increased administrative burden where local authorities have both anticipated the impact and ensure the appropriate resource and capacity within the team this can be mitigated.

Based on the research findings the following recommendations are proposed:

- **Increased use of case management within Housing Options teams to more efficiently manage caseloads and resources, triage and assess applicants on the basis of support and housing needs and connect them with local services.**

1.8 With 65% of participants engaging with at least one other service at the time of attending Housing Options the importance and value of the Duty to Refer is evident. Despite not being subject to the Duty to Refer, GPs were the service participants were most likely to access prior to engaging with Housing Options. GPs were also one of the least likely services to advise participants to access Housing Options.

Overall there is a pattern that those services who are most likely to be working with individuals with the highest support needs were more likely to advise someone seeking support for their housing needs over more universal services that support a much larger proportion of the general population such as health services and the JobCentre Plus.

Based on the evidence the following recommendations are proposed:

- **The duty to refer should be expanded to include GPs**

1.9 There is generally a positive perception of face to face interactions with Housing Options and assessment with respondents reporting that they felt listened to, respected and able to make themselves understood. However, despite this positive feeling towards the more expansive assessment phase, only 51% of respondents said they left their assessment feeling positive about their options.

Follow-up from initial assessment was repeatedly raised by research participants as being particularly problematic with long periods of not hearing anything from the local authority. This led to periods of uncertainty and anxiety that their case was not being progressed. Local authorities also reflected that they both did not feel it was necessary to keep updating participants, and that they did not always have the capacity to do so.

There is also evidence to suggest that some local authorities in our study are still gatekeeping at the prevention and relief stage, assessing individuals as to whether they would be eligible for full duty prior to reaching that stage, and allowing that to impact the support offered. Within this are examples of local authorities running down the days within the relief phase for those that would not be entitled to a full duty, or still clearly separating singles and families at all stages of the process.

The interpretation of the HRA has, among some local authorities, been very literal and there is evidence some have turned away those who are presenting at prevention stage despite being at risk of homelessness because they do not have robust proof of their homelessness within 56 days. For example, in situations where rogue landlords are trying to force an individual out of the property without formal eviction paperwork. At relief stage there are examples of local authorities believing they have to wait the full 56 days and moving someone to full duty before ending their homelessness rather than ending homelessness at relief stage.

Some local authorities also reported concern that the change in data recording meant that there was now no longer a place to capture pre-56 days prevention. In some cases this has led to them stopping this kind of activity due to concerns that it would have a knock-on effect on future funding decisions or not be acknowledged. However other local authorities have developed work arounds for this including capturing the data separately to ensure that it still recorded.

Based on the research findings the following recommendation is proposed:

- **Introduce an outcomes and performance framework to provide consistency and accountability across policies and service delivery of the HRA at a national and local level.**

1.10 Respondents' awareness of whether they had received a Personal Housing Plan (PHP) is low, with only 37% reporting that they had one, this is despite it being clear that a much higher proportion were being actively supported by the local authority. This suggests a lack of clear communication as to the detail and purpose of the PHP from local authorities towards those accessing support.

Interventions offered within PHPs are heavily focussed around advice and information to access the private rented sector despite the lack of affordable properties in the area for those accessing support. In general survey respondents reported a lack of creativity within the steps being applied within PHPs, with a reliance on standard approaches that would have been utilised prior to the HRA. This is supported by findings from a number of the local authority interviews who reflected that their approaches and interventions have not changed since the introduction of the HRA. Our practice work has also identified that regardless of how good the PHP template is, it's the quality of the interview and the assessment which results in a good PHP.

Based on the research findings the following recommendations are proposed:

- **Review the way that the Government invests in homelessness to ensure a sharper focus and investment in housing led prevention measures based on and informed by the outcomes and performance framework**
- **Increased investment and support for local authorities to develop PHPs, focusing on what good looks like and helping them to use them to achieve better housing outcomes for homeless people.**

1.11 Attaining sustainable housing outcomes remains challenging for local authorities with only 17% (98) of respondents reporting that the support they had received from Housing Options had helped to resolve their current housing issue, although a further 51% (279) stated their issue was still ongoing.

139 survey respondents reported that they were placed in emergency accommodation at some point in their engagement with Housing Options, with 70% of these placements made to those who presented at relief stage. This does suggest that the majority of participants who were assisted at the prevention stage were either able to remain in their property or have a managed move-on into another property, rather having to be moved into emergency accommodation. This is supported by wider housing outcomes explored in the research in which 68% of participants who were owed a prevention duty whilst in the private rented sector remained in the private rented sector at time of participation in the research.

However, the research does highlight more inconsistency in housing outcomes across relief cases and suggests that there is still not a consistent offer for single relief that appears to be significantly different from that which would be offered to them under the main duty prior to the HRA. For example of the 92 participants who were rough sleeping at the time of presentation, of which 90% were single households, 51% remained either rough sleeping, sleeping in cars tents or public transport, or sofa surfing.

1.12 Both survey respondents and local authorities have highlighted that there are wider structural barriers to supporting individuals into sustainable housing and that this can be a barrier to them fulfilling their obligation under the relief duty. A lack of affordable housing was the predominant concern raised here both in term of a lack of social housing and lack of accessible and affordable properties within the private rented sector. Problems with affordability in the private rented sector have been exacerbated by cut to, and the current freeze on Local Housing Allowance (LHA) rates. There were also emerging concerns raised by both local authorities and survey respondents that Universal Credit was further reducing the number of private rented properties that were accessible.

Additional investment is needed to address structural barriers that currently restrict local authorities from fulfilling the duties placed on them by the HRA to include and based on the evidence the following recommendations are proposed:

- **Investment in social housing and a national target for building homes at social rent levels**
- **Investment in LHA rates and realignment of LHA rates back to the 30th percentile**
- **Introduce national provision of private rented access schemes across England including a national rent deposit guarantee scheme**

2 Introduction

2.1 Background and context

Whilst the Housing (Homeless Persons) Act (1977), and subsequent amendments through the Housing Act (1996) and the Homelessness Act (2002) ensured that families with dependent children are automatically owed a statutory duty to secure settled accommodation, it created a situation where single people were required to demonstrate that they are significantly more vulnerable than the ordinary homeless person. In 2014, a Crisis mystery shopping exercise conducted to examine the treatment of single homeless people who approach their local authority for assistance and found that there was a widespread problems with the advice and information provided with some turned away without any help or the opportunity to speak to a housing adviser.

The introduction of the HRA redresses this imbalance of support offered to single homeless people and Crisis continues to be supportive of the huge opportunities the HRA offers. Through our research, best practice and policy work we want to support local authorities to implement a robust prevention and relief framework and challenge practice where it is not improving the outcomes of those experiencing or at risk of homelessness.

2.2 About this report

This report comprises a number of different sources of research and other activities that Crisis are currently undertaking to better understand the implementation of the HRA.

The primary focus of the findings comes from Crisis' In On The Act research, a largescale three year project funded by the Oak Foundation that provides insight in to the newly implemented Homelessness Reduction Act (HRA). It looks at the impact of the new legislation brought in from the perspective of both local authorities and clients. The research is being conducted across six local authorities across England. The research consists of three primary research elements which will be repeated annually: a survey completed with Housing Options clients, in-depth interviews with survey

respondents and local authority stakeholder interviews. The findings from the baseline fieldwork are presented in this report¹.

The majority of the findings presented in this section draw from the initial baseline results from the Crisis In On The Act research with additional sources drawn in where appropriate. The research is not intended to duplicate the evidence collected both by local authorities directly and by MHCLG through statutory data collection. Therefore, the focus is on the experience of implementing the HRA with challenges and opportunities identified as opposed to on specific outcomes for individuals. A full analysis of the three year study will be published in 2021 and will report in detail the experiences and outcomes of people approaching their local authority for assistance.

Alongside this research Crisis are also supporting five local authorities in developing and delivering good practice in their implementation of the HRA. Three of the local authorities included in those cohort are also represented in the research sample. Practice examples identified through this work are included within this report.

The briefing also draws on evidence from the Newcastle Homelessness Trailblazer, a partnership between Crisis, Newcastle City Council, local job centres and Your Homes Newcastle to identify people at risk of homelessness, and Homelessness Monitor England local authority survey which received responses from 167 local authorities in England (due for publication May 2019).

3. Research findings

3.1 Awareness of the HRA and support available

Prior to the introduction of the HRA there were concerns that the change in legislation would substantially increase the number of people accessing Housing Options support. Whilst more people are now eligible for support, reflected in both the statutory data (with 58,660 households owed a new statutory homeless duty between 3rd April and 30th June 2018) and supported by local authority survey (71% reported that homelessness had been recently increasing in their area with many citing the HRA as an affecting factor), the In On the Act research has not found that the HRA itself was a motivating factor in Housing Options attendance.

Awareness of the legislation is low with only 14% (78) of respondents reporting that they were aware of the introduction of the HRA. Of those who were aware of the change in legislation 46% (36) said that it had encouraged them to attend Housing Options, this translates to only 7% of the overall total. There was a slightly higher proportion of people who presented at prevention stage reporting that it encouraged them to attend: 58% (15) against 47% (20) for relief, however as these represent overall small numbers they should be considered with caution.

Overall most respondents were not aware of what support was available from Housing Options in general with only 20% (107) of respondents stating that they were aware of what was available to them before attending. This was reflected in the respondents' reflections on what support they felt would have been most beneficial to them when they first approached their local authority. 68% (372) of respondents identified a range of different types of support that they felt would be beneficial including support accessing permanent accommodation including social housing or the private rented sector, financial support, referral to other services including mental health and substance misuse services, and support and advice on job seeking. The range of welcomed support

¹ Further details on the research methodology and sample breakdown can be found in Appendix 1.

identified suggest no set expectation of Housing Options and an openness to a variety of different interventions.

Clear and accessible information is a core element of the HRA and in part this translates to local authorities ensuring that their website information is provides good information, advice and guidance. 39% (152) of respondents stated that information on the council website prompted them to get support with their housing issue. As with other survey findings related to awareness this was more likely to be the case amongst prevention respondents than relief respondents: 35% of prevention against 25% of relief. One of the local authority case study areas operates a digital by default approach and unsurprisingly there was a higher than average proportion of respondents (45%) who reported that information on the website had encouraged them to attend Housing Options.

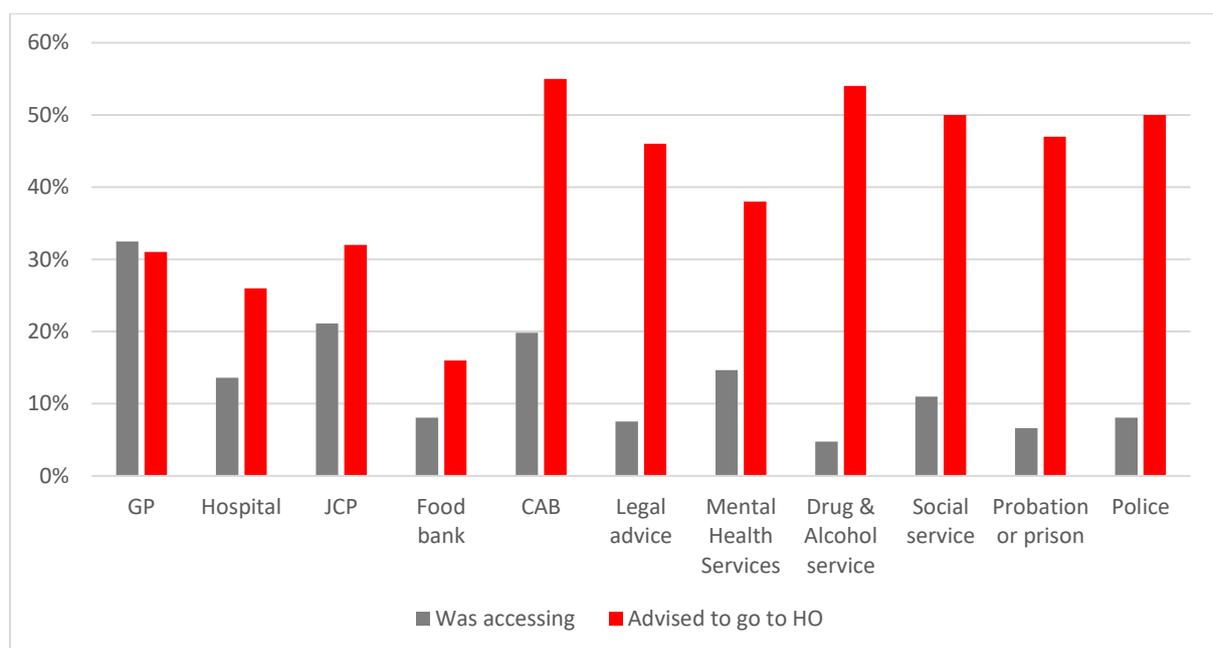
Whilst the HRA has substantially increased the scope of people eligible for support from Housing Options, and the first quarter of statutory data demonstrates an increased number of acceptances, overall awareness of the HRA is low and the and the findings suggest that knowledge of changes to the legislation from the perspective of the applicant have not specifically been a significant motivating factor in the increased number of people approaching Housing Options for assistance..

3.2 Duty to refer

The Duty to Refer was introduced at the late stages of the fieldwork meaning whilst we have some results related to the immediate period after its introduction the majority of the data is prior to the commencement of the Duty. In this context these findings should be considered as a baseline rather than an assessment of impact.

65% of research participants were engaged with at least one other service at the time they engaged with Housing Options. The Chart 3.1 below sets out the different services research participants were engaged at the time they approached Housing Options, and the percentage of which were then advised by that service to seek support from their local authority.

Chart 3.1: Percentage of respondents who were engaged with wider services



Nearly a third of respondents (32%) reported that they had seen their GP before attending Housing Options but since their housing issues had occurred. Of these respondents only 31% were advised by their GP to seek support through Housing Options and it is notable in this context that GPs are not subject to the Duty to Refer. Conversely whilst only 8% of respondents reported that they had been engaged with the Police prior to attending Housing Options, 50% of these stated that the Police had advised them to attend Housing Options. Overall there is a pattern that those services who are most likely to be working with individuals with the highest support needs were more likely to advise someone seek support for their housing needs than those more universal services that support a much wider proportion of the general population such as health services and the JobCentre Plus.

Newcastle Homelessness Trailblazer

Newcastle City Council has been working with local Jobcentres, Crisis Skylight Newcastle and Your Homes Newcastle to develop and test an enhanced partnership model to help identify people at risk of homelessness and take action to prevent it. The pilot was established as part of the government's Homelessness Prevention Trailblazer programme, and started on 5 June 2017.

The overall aim of the pilot is to explore the impact of the duty to refer within the context of a model of integrated employment and housing support provision. It aims to better understand what impact a more integrated model of service provision could have on homelessness prevention. This also includes looking at how the Department for Work and Pensions' policy and provision can more effectively help to prevent homelessness.

The service design includes:

- A comprehensive training programme for Jobcentre work coaches
- Establishing a single point of contact for homelessness in the Jobcentre
- Collaborative working to stabilise housing and enable people to work towards employment outcomes.

From 5 June 2017 to 30 June 2018 Jobcentre Plus staff made 410 referrals through the pilot where clients had been identified as being at risk of homelessness. Depending on their circumstances people were either referred to Crisis Skylight, Newcastle City Council or Your Homes Newcastle.

Following a referral clients can access a wide range of assistance to help prevent them from becoming homeless. Of the clients who engaged with Crisis:

- 71% received advice and information to help prevent them from becoming homeless
- 22% received help to secure their own accommodation.

Of the clients who engaged with Newcastle City Council:

- 16% secured accommodation with assistance through the Housing Options service
- 24% were provided with supported housing
- 12% had their eviction prevented through negotiation with their landlord.

Despite not being part of the Duty to Refer, GPs were the most likely service that respondents were accessing immediately prior to, or at the same time as engaging with Housing Options. Criminal justice services, drug and alcohol services, and citizen advice bureaux were the most likely to advise individuals to attend Housing Options, whereas hospitals, GPs and JobCentre Plus were the least likely services to do so. However it should be noted that this research was conducted primarily prior to the Duty to Refer commencing.

3.3 Initial engagement

Each of the local authority case study areas have a different model for initial engagement and triage of Housing Options which include a one-stop shop contact centre, an online application and a telephone based application.

Encouragingly survey respondents had generally positive perceptions of their initial contact with Housing Options in relation to both the physical environment and their first communications with housing office staff, reporting that they were treated with respect, and were able to communicate confidentially. There is no notable difference between the responses of different groups with consistency between both prevention and relief, and singles and families.

Table 3.1. Experience of first contact with the housing office

	Strongly agree	Agree	Neither	Disagree	Strongly disagree
The opening times of the housing office suited me	18%	64%	7%	6%	1%
The environment of the waiting room was comfortable	15%	58%	9%	11%	4%
I was treated with respect when I first approached the housing office	21%	58%	6%	7%	5%
I felt I could explain my situation confidentially at the housing office	18%	55%	4%	13%	6%
I was able to make myself understood	16%	59%	6%	10%	4%

N=538

35% of respondents reported that they met with a case worker for their assessment on the same day that they first attended, with a further 39% being asked to return for their appointment on another day. The average reported wait for a follow-up appointment was 9 days with very little variation between prevention and relief cases, or families or singles.

There were some frustrations highlighted relating to a lack of communication and clarity on when they would be having their appointment, and this included amongst those who were seen on the same day.

“I was there the first thing in the morning, that’s where I went, you know? The first thing. I was the first one through the door. They said I didn’t have an appointment, they told me to come back at like 2:30 or something like that and, you know, I came back and I waited and waited and waited and I sat there till like almost 4 o’clock before someone saw me.” (local authority A)

“I know the very first person I saw when I went to them was very much, can’t do anything for you without an appointment, go away, come back. They literally made me break down into tears upon leaving because I was like, as expected, I got zero help.” (local authority A)

However, there was also clear examples of good practice amongst local authorities with respondents highlighting positive engagements at this early stage, including ensuring that there even where there was a delay between appointments they were still given advice based on their initial presentation.

“They seemed willing and wanting to help and things to try and get me somewhere to live, basically.”
(local authority F)

Only 3% of respondents (14) state they were given no support. This includes a mixture of prevention and relief cases with five people in this group reporting they were street homeless at time of presentation, and one saying they had been released from prison with no fixed address. Within these 14 individuals there was a range of reasons given for not being offered support including: no recourse to public funds, lack of local connection, not being able to provide evidence of current situation, and a general lack of eligibility for support. This is particularly notable in the context of the 2014 Crisis mystery shopping exercise² conducted to examine the treatment of single homeless people who approach their local authority for assistance, and which found that there was a widespread problem with the advice and information provided with some turned away without any help or the opportunity to speak to a housing adviser. The research findings suggest that this is one of the most substantial changes observed since the introduction of the HRA and that the change in legislation has had a noticeable impact on widening access to single homeless people.

3.2 Advice and assessment

For most of the respondents there was not a clear-cut separation between the advice and assessment stages of their interactions. Overwhelmingly advice and assessments were conducted within Housing Options with only six respondents saying they were initially directly referred to another service for advice. This suggests that local authorities are still primarily delivering their services and advice in-house and are not necessarily taking advantage of the wider sector and services available to support with delivering elements of the HRA or to assist them with helping both prevention and relieving homelessness.

This is further supported by examples through our practice work which has found that local authority staff have limited capacity (both time and skills) to signpost clients to the range of services they require to prevent/relieve their homelessness. In some areas we are working in there are limited services for Housing Options staff to signpost their clients to which prevents holistic service responses. There are often limited service offerings available to include in Personalised Housing Plans (PHPs) to facilitate ‘wrap around’ responses for clients. These service offerings can be limited for client groups such as single people, people leaving care, people experiencing domestic abuse, people with complex needs (i.e. mental health and drug/alcohol misuse issues), young people and people exiting prisons and hospitals. This is a result of a combination of a lack of funding and/or a disconnect between what frontline practitioners identify as gaps in what they are able to offer and how this is communicated back to budget holders/commissioners.

However, as with their initial contact respondents were generally very positive about the standard of the advice they were given, finding it relevant, clear and easy to follow.

Table 3.2. Experience of advice provided

	Strongly agree	Agree	Neither	Disagree	Strongly disagree
The advice I was given was clear and understandable	15%	70%	7%	6%	1%

² Dobie, S., Sanders, B. & Teixeira, L. (2014) *Turned Away: The treatment of single homeless people by local authority homelessness services in England*. London: Crisis

I felt the advice was relevant to my situation	14%	62%	10%	10%	3%
I found it easy to follow the advice I was given	13%	62%	12%	10%	3%

N=330

This was also highlighted in in-depth interviews.

“I got taken into a room and this guy gave me a load of paperwork, including a big map of where I’d get the most Housing Benefit to cover rent and that kind of thing, and said, ‘Anywhere within this line is where you’ll get the most help with paying for your accommodation. Anywhere outside, that will come under different councils’ – that kind of thing. And then he said that I’d have to come back for a follow-up appointment.” (local authority E)

When asked about their assessment specifically there was again generally a positive review of the overall process and the frontline staff who undertook the assessment. As Table 3.3 below sets out there was a feeling that staff were respectful, well informed and created a trusting environment. There was little variation between the different groups in terms of their perceptions of assessment.

Table 3.3. Experience of assessment process.

	Strongly agree	Agree	Neither	Disagree	Strongly disagree
I felt the staff made clear what was available to me and why	16%	56%	12%	12%	4%
I felt I had enough time to explain my situation	18%	62%	7%	9%	4%
I felt the staff listened sensitively and with respect to my situation	21%	58%	7%	9%	4%
I felt it was difficult to be honest about my situation	3%	18%	5%	55%	17%
I felt the staff understood my situation	18%	53%	12%	12%	6%

N=425

This positivity towards the assessment process was also highlighted in the follow up interviews demonstrating the value of meaningful assessment conversations with Housing Options staff.

“the guy was absolutely fantastic, I mean I probably sat there with him for over an hour and obviously I was a bit emotional because of the situation and everything, because I’ve never been through this before, and he was quite understanding, he did kind of explain things to me,” (Local authority C)

the face-to-face with that second lady, she pretty much blew me away with being absolutely kind and sympathetic and gave me the complete opposite end of feelings for (laughing) how I felt towards them..” (Local authority A)

“I struggled a little bit with some of it, but the interview itself, the lady, I found was very helpful. And, yeah, on the whole I found it to be a positive experience.” (Local authority E)

However, despite there being an overall sense of positivity towards the assessment process there was examples of poor practice and suggests a lack of consistency in approach both across, and within

local authorities. In particular where poor communication results in frustration from the customer leading to lack of engagement or withdrawing from support.

“I kind of want someone to kind of understand and listen to what I’m trying to say to them, but they tend to talk over me. With my anxiety I do tend to interrupt, but if I don’t say it sort of when I think it, I forget what I’m going to say, so that’s why I kind of do that, but then they get, they keep interrupting me and then it just ends up with me getting frustrated and saying, “Oh just forget about it, just leave it” because there’s just a bit of a communication breakdown.” (Local Authority C)

Not very communicational, you know, like I couldn’t really communicate. It’s like she just worked off of like a [piece of] paper. I feel like they just have certain standards that they have to deal with, and that’s how they go by, you know, it’s not like they show any kind of remorse of your situation and go out of their way to help you or, you know. I mean she didn’t even offer me a place to go and see afterwards, you know, like [name of other service]. (Local authority B)

“It was just her tone of voice, the way in which she’d say certain things, just the whole demeanour about it just made you small, made you feel like you were a failure really.” (Local authority A)

Despite finding generally positive experiences of the assessment process the same was not true about the assessment outcomes with only 51% of respondents reporting that they left feeling positive about their options. This does hide some significant variation between the different local authority areas with one local authority showing 65% of respondents feeling positive about their options against 25% at one of the other case study areas. The following section, exploring Personalised Housing Plans and considering reasonable steps taken looks to explore why so many respondents did not feel positive about their options in resolving their homelessness.

3.4 Personalised Housing Plans and reasonable steps

Despite being an integral part of the HRA the majority of survey respondents were not aware as to whether they had received a Personalised Housing Plan (PHP) with only 37% stating that they had received one. There are some respondents who rightly did not receive a PHP either because they were not eligible for support or their housing issue was resolved at advice stage. Likewise, this does not mean that only this proportion of respondents did receive a PHP as it is clear from their other responses that they were given support from the local authority, however it does suggest that awareness of PHPs was low, and indicates a lack of clarity in communication from local authorities as to the process they are engaging their customers in.

Where respondents were aware that they had received a PHP they were asked for details of the support it entailed. Table 3.4 below sets out the range of support included in PHPs across all the local authority areas. They have been broken down based on the expectation of reasonable steps set out in the code of guidance and as expressed by the Secretary of State³, as well as some additional categories to capture wider interventions being delivered.

Table 3.4: Support provided in Personalised Housing Plans

Intervention	Count	%
Attempting mediation/conciliation where an applicant is threatened with parent/family exclusion		
Landlord mediation	7	4%

³ Ministry of Housing, Communities and Local Government (2018) Homelessness Code of Guidance for Local Authorities, 11.23

Family mediation	12	6%
Assessing whether applicants with rent arrears might be entitled to Discretionary Housing Payment		
Support to pay rent	48	24%
Providing support to applicants, whether financial or otherwise, to access private rented accommodation		
Rent deposit	60	30%
Information on accessing the private rented sector	112	56%
Assisting people at risk of violence and abuse wishing to stay safely in their home through provision of 'sanctuary' or other measures		
A refuge or other sanctuary accommodation	14	7%
Helping to secure or securing an immediate safe place to stay for people who are sleeping rough or at high risk of sleeping rough.		
Temporary accommodation	40	20%
Emergency accommodation	39	20%
General support		
Support with financial budgeting	41	21%
General advice	90	45%
Referral to other services		
Legal services	7	4%
Homelessness charity or service	27	14%
Women's service	5	3%
Drug and alcohol service	2	1%
Adult social care	2	1%
Mental health services	7	4%
Children's social care	2	1%
JobCentre Plus	9	5%
Domestic violence services	4	2%

N=192

It is clear from the survey responses and from the in-depth interviews conducted that the most common form of intervention offered is information on accessing the private rented sector. A number of participants in the research highlighted that this was the only support they were offered and at its most basic consist of a list of potential landlords for them to contact, of which a number of participants reported that they were unable to access these properties due to Universal Credit.

"most of them they said to go and rent privately." (Local Authority A)

"basically they just said to look at these websites and this is your like weekly allowance, weekly rent allowance, just went through things like that. But as I say, a lot of the websites that they give are like Zoopla, Prime Location, things like that, and as I say, a lot of the landlords don't want to know." (Local authority C)

"Basically just keep a log of what I was doing sort of trying to find private accommodation, you know... but as I say...it was out of the price range of the housing benefit, you know?" (Local authority E)

“Right, so what it was in the personal housing plan was they were going to look and obviously they wanted us to look in the private sector and all, which that’s what I said, we’ve been doing and they’ve been doing but that’s what the plan was. They would look and we would look.” (Local authority D)

Both survey respondents and local authorities also reflected on the limitations of this offer acknowledging the challenges of finding affordable housing in the private rented sector and the challenges this created for them in finding sustainable housing outcomes.

“Are you willing to look on these sites to find properties?” And there was like Zoopla, all these different websites to look on. But basically the problem I’m having is 99 percent of landlords don’t want to take the housing deposit because they have to have someone from the council go round and assess their property and a lot of landlords don’t want that, so that’s a problem I was having.” (Local authority C)

“It was good seeing that people really care about other people, but they are not able to help. I was looking at the lady as they tried to help me and I can see they’re not able to do more. I could see the disappointment in their eyes like they really wanted to give me a house, at least the lady with the assessment, but she knew I’m not going to receive one because the demand is extremely big in Local Authority A.” (Local authority A)

“And it doesn’t tackle the big elephant in the room, which is that – not that there’s a shortage of housing, it’s that there is a shortage of affordable housing. If property were affordable, then we wouldn’t be here.” (Team leader - local authority B)

Nevertheless based on the research findings there is a distinct lack of creativity being applied to steps taken within the PHPs.

There was also some reflection that the PHPs were not being personalised to individual needs. 24% of respondents who had stated they had received a PHP plan stated that it was not personalised to their needs, and this was further reflected in the in-depth interviews.

“There was nothing “personal” about the PHP, it was very generic” (Local Authority A)

“When I first joined the team in April, I was asked to specifically review cases of personal housing plans, and I found them all the same, and it wasn’t kind of like tailored for the individual person or their case, and that was an issue that I kind of brought up to the manager.” (Housing Officer – Local authority B)

Local authorities also reflected on the challenges in delivering PHPs based on their respective administrative and technological set-up.

“Especially with the way the PHP is set up on our computer system; to make tasks you have to do each one manually and it probably takes you about five minutes to do each task, and if you’re sitting with a person in front of you when you’re doing that it’s not good personal service.” (Housing Officer – Local authority A)

The feedback from local authority is not wholly negative and in cases where the local authority has embraced the support plan aspect of the PHPs they are emphasising the benefit of them. However, they did also highlight their concerns that customers weren’t then engaging with the PHPs which perhaps speaks to why there was such low awareness of PHPs amongst survey respondents.

“Well, I create, on the personal housing plan, I put a lot of detail in there about affordable, affordability and different areas, properties that are available in different areas. I do research on

properties and put links, type links onto the personal housing plan, so they're really specific in showing what the housing options are. A lot of the people I don't even think they look at it, or they just see [Out of borough area], the word [Out of borough area], which they don't want and then they don't go any further." (Housing Officer – Local authority B)

Our practice work has identified some good examples of PHP templates which have clear sections and compile the information into an easily understandable format. The work has also highlighted that regardless of how good a PHP template is, it's the quality of the interview and the assessment which results in a good PHP. Whilst the initial intention of the personalised plan was to collate all actions required to find and sustain accommodation in one place, working with local authorities has identified this is difficult in practice due to the timed nature of them. Whilst they may include assessed support needs and actions to address them, once the housing need is resolved and duty discharged – there is little follow up on these other actions. Examples, we have seen are referrals in the PHP to credit unions or debt advice to deal with financial issues but no follow up to see what happened with these referrals.

Our practice work has also identified that some staff are reporting that developing PHPs with 'wrap around' responses are just not possible within the timeframes they have when interviewing clients and developing PHPs. Some staff have caseloads between 100 and 200 and they can only provide the bare minimum and encourage the client to respond to their immediate needs (i.e. find accommodation) as opposed to responding to issues that may have contributed to their homelessness/risk of homelessness. The HRA being more of a case management approach to working is explored further in section 3.7 However, it is also relevant when considering PHPs with local authorities identifying that PHPs have value in their function as a support plan, but this is only the case when considered as part of a holistic case management approach.

"[Rough sleeping support charity] are doing our personal housing plans on behalf of the city council, which is mostly their support plans with a bit extra added in. It was felt that the people that they were engaging with, you know, don't want this to become, you know, a bureaucratic process – it needs to add benefit and add value for people. So, rather than have other people involved unnecessarily, they're working, they're engaging with that person, they're building their confidence and trust with that person, so they carry on and do the plan with them." (Management – Local Authority A)

"We are always trying to work more on going the extra step, though, with the plans. When we trained it all out, we were very much like 'oh it's very restorative', you know, you can address someone's mental health with them, you can talk about how if someone's got an addiction issue they're going to get help and we very much wanted to go in that direction where we could help fix the cause of the issue rather than just fixing the issue itself, and there's always work to do around that." (Team leader – Local Authority C)

"In my head a PHP is a support plan and it's possibly the worst support plan I've ever seen. I've used lots of different support planning tools and just the layout of it, how it's done, it just doesn't... it's not person-centric, it's not holistic. We can override and write our own tasks in but it would be so much easier – and for them to be able to see is as well visually; for people to engage in the support plan they have to be able to read it and see it easily and it's just not." (Housing Officer – Local Authority A)

The contradiction across different local authorities in how the HRA is being interpreted and implemented is also echoed in the Homelessness Monitor England report which shows that 46% of local authorities in England said the HRA has prompted more effective homelessness prevention

work and 58% have introduced new prevention and relief services as a result of the Homelessness Reduction Act 2017. Whilst this is encouraging there is clearly more work to be done in areas where the HRA has not prompted this action.

Awareness of PHPs is low suggesting a lack of clear communication from local authorities towards those accessing support.

Interventions offered with PHPs are heavily focussed around advice and information to access the private rented sector despite the lack of affordable properties in the area for those accessing support.

There is a lack of creativity within the steps being applied within PHPs with a reliance on standard approaches that would have been utilised prior to the HRA.

Local authorities are constrained in what they are able to offer by the housing supply available to them, and challenges related to welfare reform in particular LHA rates and a growing number of landlords not renting to those on Universal Credit have made it very difficult for them to provide sustainable outcomes for homeless households.

Whilst the lack of variety provided in PHPs does suggest a lack of creativity on behalf of local authorities to undertake their reasonable steps local authorities have highlighted that there are wider structural barriers that they find prohibitive to supporting individuals to sustainable housing outcomes. A lack of affordable housing was the main concern here both in terms of a lack of social housing and the challenges presented by the LHA rate creating barriers in accessing the private rented sector.

3.5 Housing outcomes

Whilst 279 out of the 545 respondents (51%) stated that their case was still ongoing and therefore it was too early to assert whether the support they had received overall from the local authority had helped to resolve their housing issue, we are able to look at this for the remaining 49% of respondents.

Only 17% (98) of respondents reported that the support they had received from Housing Options had helped to resolve their current housing issue. Of this group 27 have been assessed as coming in at prevention stage, 61 as coming in at relief stage and for 10 it is unclear what stage they were when they started engaging with Housing Options.

Table 3.5 below shows the accommodation breakdown for participants at time of presenting to Housing Options and where known whether this was a prevention or relief case. It clearly shows that the three most common accommodation types at time of presentation to Housing Options are temporarily living with family or friends, private rented accommodation, and rough sleeping which is representative of the statutory data presentations.

Table 3.5: Accommodation at time of presenting to Housing Options

Accommodation	Prevention	Relief	Unknown	Total
Rough sleeping including squatting	0	92	0	92
Cars, tents or public transport	0	2	0	2
Institution e.g. hospital, prison or NASS accommodation	0	9	0	9

Hostels, refuges and night shelters including UTA	0	22	0	22
Temporarily living with friends/family	47	111	1	159
Supported housing or supported accommodation	5	5	2	12
Lodging (not with family or friends)	3	3	0	6
Living in partners own property	0	7	3	10
Living in someone else's Council/Housing Association property	6	12	7	25
Private rented	93	31	16	140
Social tenancy	8	9	17	34
Own property	3	2	8	13
Other	3	1		4
Unknown	3	4	9	16
Grand Total	171	310	63	544

N=545

139 respondents reported that they were placed in emergency accommodation at some point during their engagement with Housing Options. In over 52% of cases this was some form of temporary accommodation including hostels and B&Bs, however there was also use of nightly paid lets in the private rented sector. Not unexpectedly 70% of these emergency accommodation placements were made to those who presented at relief stage however this does imply that in the majority of cases those who came in at prevention were able to either remain in their property or have managed move-on rather than have the need for emergency accommodation.

A further 40 respondents reported that their local authority had helped them to find another form of alternative accommodation with 82% of these made up of an equal split between temporary accommodation, private rented, and social tenancies.

The following series of charts (3.2, 3.3, 3.4) highlight the housing outcomes for the three most common accommodation types: temporarily living with family or friends, private rented, and rough sleeping. They show that there does appear to be more of an inconsistency in outcomes for relief individuals and households than for prevention. In particular the outcome flow for rough sleepers, who were 90% single households, suggests that there is still not a consistent offer for single relief that appears to be significantly different from prior to the HRA.

Chart 3.2: Housing outcomes for those presenting as temporarily living with friends or family

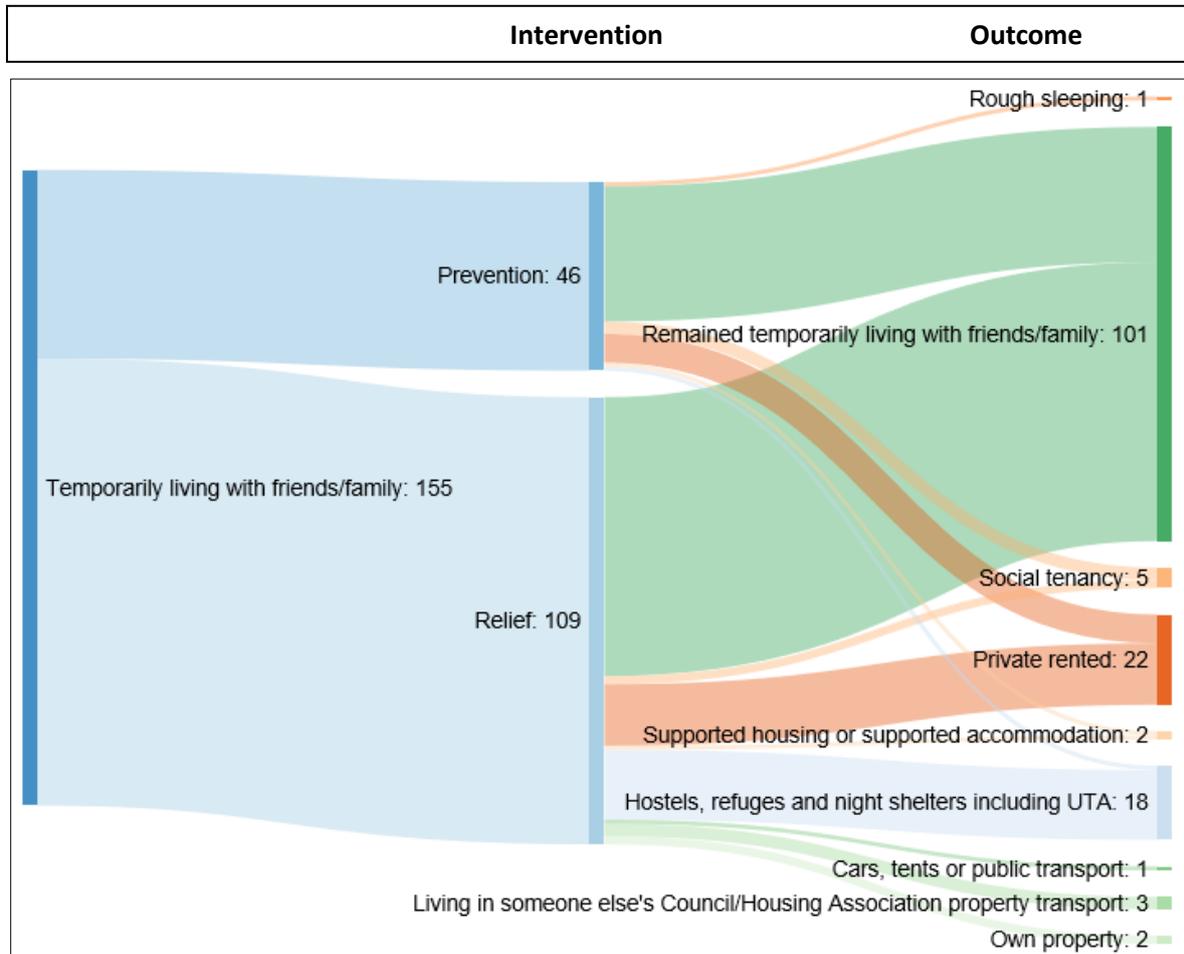
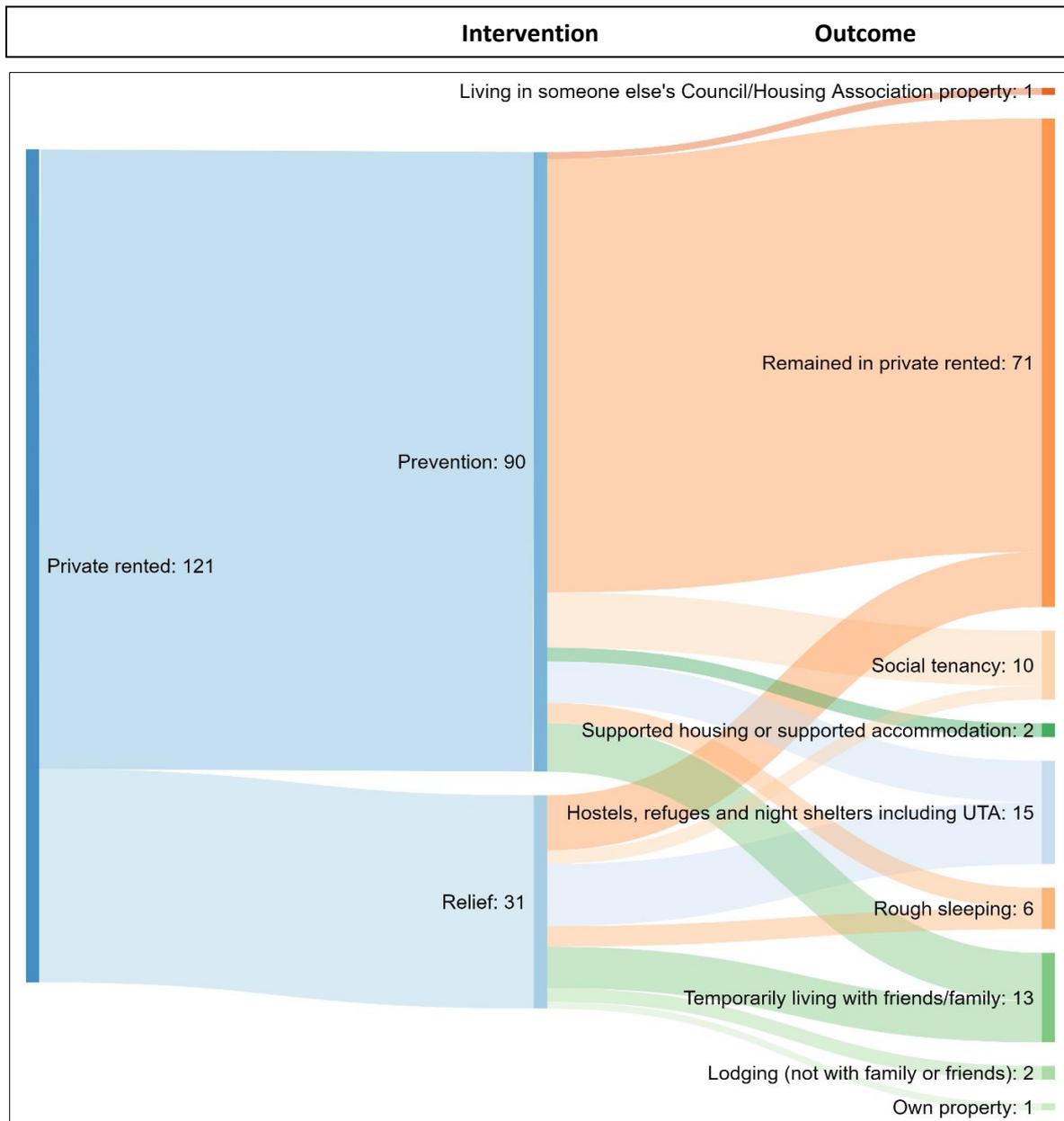


Chart 3.3: Housing outcomes for those presenting as living in the private rented sector

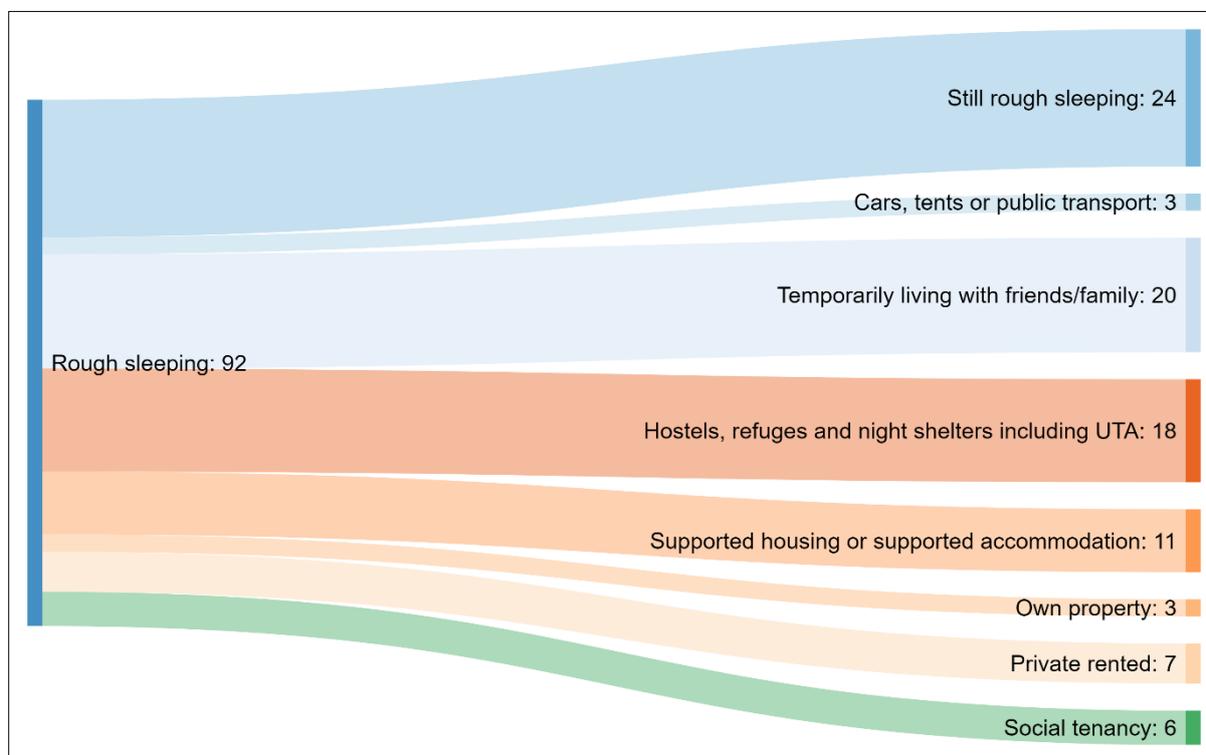


There is a clear difference in outcome for those presenting from the private rented sector at prevention or relief stage. It is encouraging to see that the majority of those in the private rented sector at prevention remain in the private rented sector suggesting that successful prevention activity is ongoing. However, the comparable outcomes for relief suggest a much less coherent pathway with 29% finding themselves in less stable forms of accommodation including rough sleeping and sofa surfing.

Poorer housing outcomes at relief stage is echoed in the rough sleeping flow, of which 90% were single households, which shows that 51% remained either rough sleeping, sleeping in cars tents or public transport, or sofa surfing. Single relief cases are those that were expected to see the most substantial changes to support available to them following the introduction of the HRA, and whilst

access has been widened out to them the research does suggest that there is still not a consistent offer for single relief that appears to be significantly different from prior to the HRA

Chart 3.4: Housing outcomes for those presenting as rough sleeping



Access to social housing remains a key challenge across all the local authority areas and through local authority interviews they highlighted the challenges associated to this. In a number of cases acceptance at either prevention or relief stage will give someone an automatic banding with some local authorities highlighting this has been introduced with the HRA.

“people that come through prevention get into band 3 if they’re eligible” (Local authority A - Manger)

“now, we are offering Band C in the relief period” (Local authority F – Manager)

However as one local authority highlights this does not mean that they will be accessing social housing any time soon and emphasises the challenges that local authorities have in finding sustainable housing outcomes.

“now the way that...the housing register, has been organised is that if people are either prevention or relief duty then they are band 3 or 4 and that means that they’ll be waiting three years or four years or something to be re-housed.” (Local authority A – Housing Officer)

Priority need and therefore acceptance into the main duty still remains the means in which an individual is able to access a higher priority band for social housing.

3.6 Overall experience

49% of respondents agreed or strongly agreed with the statement their experience with Housing Options had met their expectations. There was some small variation of this between different groups with 57% of prevention families stating this against 44% of prevention singles, the difference at relief stage was smaller but also suggested that singles were slightly happier with their experience with 52% of single relief against 47% of relief families. This also shows that 51% of respondents felt their experience did not meet their expectations. This is reflected in the in-depth interviews which highlight a range of different experiences suggesting a huge variation in practice across the different local authorities.

The attitudes and approaches of staff had a real impact on the way that people perceived their experience. There was a range of positive and negative experiences with staff which could vary greatly within a single services.

“It varies, some of them are fantastic, and sort of when you go into the office some of them are absolutely fantastic and some, there’s one woman in the private housing team, I’ve seen her like twice now, and she’s actually fantastic and she always puts your mind at rest and a really, really nice woman, but you get some of them and they just sort of [...] just come across really patronising, sort of quite abrupt” (Local authority C)

“It was just her tone of voice, the way in which she’d say certain things, just the whole demeanour about it just made you small, made you feel like you were a failure really.” (Local authority A)

“I saw in her eyes that she really wanted to help me, but it was not up to her.” (Local authority A)

As has been highlighted in section 3.3 positive experience of staff led to the participant feeling supported and listened to even if this did not lead to an expected or hoped for outcome. Many participants spoke about how the positivity they received from staff helped them feel at ease during a time of stress and pressure.

“Very professional. They even – they were allowing my little boy to have movement around and, you know, letting him draw and that kind of thing, giving him paper. And they were really, really nice and friendly professional people.” (Local authority E)

“she was awesome. She was, “I can generally see that you are scared, you are in fear, you are a bit confused by things.” She reached out and she was like, “Right, I can see where you’re at. I can feel what’s affecting you.” She did try her best to explain everything as much as possible without dumbing it down to complete, you’re an idiot sort of terms and (laughing) words, because it wasn’t that I didn’t understand it, it was just half of it wasn’t getting in because...” (Local authority A)

The converse was seen if participants had what they saw as a negative staff experience. This speaks to a variation in approach seen with the PHPs as well, between holistic support driven models of working and more process approaches.

“I felt like they were under a lot of pressure and didn’t really have time, to be honest. It was like, it sounds awful, but they were trying to pass me onto somebody else, that’s what it felt like.” (Local authority F)

“although the case worker knew that it was something of a concern when she took it to the people that made the choices, they were just a case of, “According to our system.” There’s nothing to help identify the mental side of it, so according to the system, there’s nothing more we can do. It was like, the system isn’t the chooser. It’s you who’ve made the system so you who choose.” (Local authority A)

It was evident that in a few situations there had been a negative experience of the triage team who were the first people that the participant had spoken to at Housing Options. In the below this was in stark contrast to the experience they later had with a housing officer.

“the very first person I saw when I went to them was very much, can't do anything for you without an appointment, go away, come back. They literally made me break down into tears upon leaving because I was like, as expected, I got zero help.” (Local authority A)

This was followed up with better support once they had contact with a trained housing officer.

“she pretty much blew me away with being absolutely kind and sympathetic and gave me the complete opposite end of feelings for (laughing) how I felt towards them.” (Local authority A)

3.7 Caseload and capacity

Whilst the majority of participants reported that they were generally happy with the quality of their assessment and engagement at that stage of the process one of the key issues highlighted by research participants was the lack of any follow-up post their assessment.

“None, really, apart from a housing plan and a list of private landlords, because according to this housing plan, they were supposed to contact me on 28th September which has never happened. I've had no other correspondence with them at all. I have rung them because now, I have to notify them I have actually changed address, which is something I need to do, but I cannot get hold of them.”

“It says here, what we will do, your housing advisor will call you regularly on an agreed date and discuss the progress made on your personal housing plan. I've had nothing from them at all. I have tried ringing him and I've left messages on his answerphone.”

“Nothing, no paperwork, nothing in the post, no follow-on phone calls to see if I'm okay or if I've heard anything, nothing.”

Local authorities reflected that this was overwhelmingly due to their caseload size and inability to manage the level of case working that was now expected of them. They reported that the increased administrative burden was challenging to manage and that this restricted them from being able to do the required follow-up and continued that is expected from the HRA and new ways of working.

Local authorities particularly emphasised the challenges of their caseloads and how this was becoming prohibitive to constructive case management working.

“So, you had a maximum amount of cases that actually at that point it stopped until you could then start closing cases and stuff. Here that doesn't happen; it's just continuous. And I think I got to 40 a couple of weeks ago and I was like, “It has to stop at some point”, and I was just told, ‘No, it doesn't; you just keep going’.” (Housing Officer – Local authority A)

“So, she came in, so my whole day was then with her. Then I was given a case and the whole day was spent with those two people, the whole entire day. So that meant there's 30 cases I've got left.” (Housing Officer -Local authority B)

This is also reflected in the practice work supporting local authorities where housing options officers are holding significantly higher caseloads with additional administrative duties as well. This has reduced officers' ability to do effective casework and follow-up to check on clients' progress is almost non-existent. This has highlighted a particular capability and skills gap around 'case

management' and is having an inevitable impact on outcomes for applicants. PHPs are not being reviewed and monitoring and local authority actions are not being completed, for example if someone finds their own property, tries to contact their caseworker but before they receive a response the property has gone.

Despite this there are examples of local authorities who have restructured their teams and processes sufficiently that they were not finding this to be the case, and were better able to keep their caseloads lower.

"I think in terms of the way that my – and this is after speaking to other members of staff, as well – they say that the average per advisor here is, I think, 15, but I think that's taking into account every single advisor which, if you're working on a temporary accommodation team or if you're working on private rental or the first contact team, their caseloads are going to be far, far fewer than ours. And so, I would say with A&A team, you're probably anywhere between usually... you can be quite low if you've had a bit of back office time, but if you haven't had a full back office day or something like that and you have been picking up full-on... let's say they're more complicated cases, I would say that a lot of people are up to between 20-30. I wouldn't say that's unusual for our team at all." (Housing Officer -Local authority C)

The local authorities consulted also commented on the increased resource needed to fulfil the new data requirements under H-CLIC. In some cases this was highlighted as being one of the most significant challenges in implementing the HRA. In other local authorities it was clear where this additional resource had been anticipated and appropriated processes had been put in place this had not detracted from wider delivery of the HRA.

One of the most notable variation between the different local authority areas was the changes made to their staff teams following the introduction of the HRA. One of the local authority areas included in the research has made substantial changes to their structure and way of delivering following the introduction of the HRA and the success of this is supported by the research findings in which 65% of this local authorities respondents agreed that they had met their expectations against an average of 51%. The key focus for this local authority was to invest in increased management level staffing to create a series of smaller teams and to ensure caseloads could be managed effectively.

"So as part of all the funding we got, our head of service decided to employ a lot of team leaders, so whereas I know a lot of other local authorities spent it on administrative stuff, you could help with the plans and the letters, we sort of went with more of a ... more managers to help manage caseloads, so to begin with I think every single case was coming through a manger and being discussed so the staff didn't feel like they were out on a limb making decisions that they were maybe not confident in, so I think that helped a lot. Got a very open culture with cases, haven't we? Cases are always being discussed with managers, I think there's not a single case where not one manager knows what's going on with it, and we found that that really keeps people's morale high, because they don't feel the pressure, especially when things are new. We've also got...a 'for people' plan as well, which is specifically to keep health and well-being at a good level, so we've got all sorts going on, we do exercises" (Team Leader - Local authority C)

This compares to local authorities where there's a sense that there has not been a substantive enough change made and attempts are being made to continue with previous means of working whilst overlaying the new legislative requirements.

"I think some of the Team Leader struggle with the HRA and that's a big thing as the Housing Advisors we have to sort of manage as well because they're still in the old legislation and old way of

working and we have to try and.... I find I battle with Team Leaders to sort of try and work more towards the HRA. So, that's a bit of a... I think they're getting better; I'm finding it is getting better but they have to sort of be reminded about the HRA." (Housing Officer - Local authority A)

This difference in approaches between delivering more substantive changes in approach against more traditional modes of working was reflected in the Homelessness Monitor England in which encouragingly well over half of LA respondents (62%) saw the HRA as having enabled a 'more person-centred approach', with this response particularly common in London (79%). This is also supported through our practice work which has found an increased value and emphasis placed on staff's softer skills including motivational interviewing, reflective practice, strength-based practice which is having some positive impacts.

As with the wider increased administrative duties on local authorities this does suggest that where the appropriate steps have been taken to plan and mitigate for the changes then they are not prohibitive to delivering the HRA, however a local authority cannot expect to simply apply the new duties on to old ways of working.

3.8 Culture change

"It's not the HRA that's causing the issues, as much. If anyone's struggling to adapt to the change, they need to reconsider their options basically, which sounds harsh, but I do tend to find that... I mean, HRA, you could say, has had an impact on the team, but it's not the laws because it's more favourable towards the customer, and it gives us more time. A new way of working, basically. We are getting the results though, as a whole." (Housing Officer – Local authority E)

In 2014, a Crisis mystery shopping exercise conducted to examine the treatment of single homeless people who approach their local authority for assistance found that there was a widespread problem with the advice and information provided. The most common type of help the mystery shoppers were given was signposting and information leaflets (of varying quality). Mystery shoppers frequently reported feeling they had been quickly 'dismissed' with a selection of leaflets and information sheets. It was also common for them to be given maps that were impossible to comprehend, signposted to written information about renting privately or even turned away without any help or the opportunity to speak to a housing adviser.

It is clear from the research findings that this has changed substantially since the introduction of the HRA with only 3% of respondents stating they were turned away with no support or advice. However, there is continues to be concerns that there is some gatekeeping occurring particularly in local authorities with more protracted triaging processes. This was generally put down to lack of knowledge and training rather than any deliberate intent.

"I've found by accident that some have just been triaged by them and it's not a proper triage, it's just sent away, and that is sort of the old gatekeeping thing that the local authorities used to do that is still happening a bit in [Local authority A]. I think that's purely training and actual education about what we do in the HRA" Housing Officer - Local authority A

The research has also identified some potential unintentional consequences of the HRA that suggest that some local authorities are not implementing the HRA in the spirit that it was intended. Notable examples of this relate to very literal interpretations of the HRA wording for example local authorities turning people away at prevention stage when they can't evidence that they are within the 56 days, because they don't have an eviction notice, despite being clearly at risk of immediate homelessness based on their presenting need. This was particularly apparent for those with rogue landlords who were refusing to process their eviction through the courts but were attempting to

remove the person through other means including intimidation and in some cases relocating back to the property.

Another example of potential misinterpretation of the HRA is some local authorities in our study believing that they have to wait the full 56 relief day before providing someone with the support they might be offered if they were under full duty, this includes those that would be considered priority need. When asked if they were waiting 56 days to do a main duty assessment Housing officers responded:

“Housing Officer 1: Yeah, I am.”

“Housing Officer 2: Yeah, because I thought you had to unless it was intent and you could start with them before.” (Local authority A)

“Otherwise, we’d have to wait until the end of the relief period before they could get any higher banding.” (Local authority F – Manger)

Waiting for the end of 56 days before being given any further support was also seen by the participants in the in-depth interviews.

“Well, part of that was that they had to, they had to wait, it’s something to do with the law on this 56 days but that they cannot nominate him for a sheltered like, like warden controlled properties until these 56 days was up.” (Local authority D)

There is evidence to suggest that some local authorities in our study are still utilising gatekeeping at prevention and relief stage, assessing individuals as to whether they would be eligible for full duty prior to reaching that stage, and allowing that to impact the support offered. Within this are examples of local authorities running down the days within the relief phase for those that would not be entitled to a full duty.

4 Recommendations

Based on the evidence set out in this briefing, we propose the following recommendations:

4.1 Expand the duty to refer to GPs

The Duty to Refer should be extended to GPs to maximise the opportunity to prevent homelessness.

4.2 A duty to prevent homelessness should be place on all public bodies

The introduction of the Duty to Refer reflects a recognition that successful homelessness prevention can never just be the responsibility of the local housing authority. However, while this is an important first step the actual requirements it places on public authorities are minimal. It is possible for public authorities to fulfil their duty through creating a narrow referral process that by itself is likely to have little impact on preventing homelessness.

Crisis advocated for the legislation to go further and place stronger requirements on public authorities to work with local housing authorities to prevent homelessness. Effective joint working is key to help address the range of factors that can cause an individual to become homeless, and successfully prevent it. The duty to refer falls short of this and fails to fulfil the government’s ambition to embed homelessness prevention across all government departments.

Crisis therefore recommends that individual government departments (including the Ministry of Justice, the Department for Work and Pensions, the Department of Health and Social Care, the

Home Office and the Department for Education) review their existing policies to ensure they do not undermine homelessness prevention, but actively contribute to achieving it. The Government should introduce new duties on relevant public bodies that require them to take reasonable steps to prevent homelessness and identify the specific measures that each public body must carry out in order to prevent homelessness. It is Crisis' view that prevention activity should be undertaken by other public bodies ahead of the existing duty on local authorities to prevent homelessness for people who are risk of homelessness within 56 days.

In addition to introducing a duty on public bodies to take reasonable steps to prevent homelessness, the MHCLG should review the existing Duty to Refer to ensure that sufficient measures are put in place to ensure that local authorities and other public bodies cooperate effectively with each other to prevent and relieve homelessness.

4.3 Additional investment is needed to address structural barriers that currently restrict local authorities from fulfilling the duties placed on them by the Homelessness Reduction Act and specifically include:

- **Investment in social housing and a national target for building homes at social rent levels**

In England, there is no national target for building homes at social rent levels. Government policy since 2012 has resulted in a significant reduction in the number of homes for social rent, making it harder for local authorities to house homeless households.

Crisis therefore proposes that the Westminster Government set an annual target of an additional 90,000 social homes each year for the next 15 years and invests in substantial increases in the delivery of social rented housing

- **Investment in LHA rates and realignment of LHA rates back to the 30th percentile**

The under investment into Local Housing Allowance rates is not only a barrier to preventing homelessness but means people cannot be supported out of homelessness and into the private rented sector where suitable. Where people are stuck in hostels and temporary accommodation without being able to move on, this reduces access to these services for others, leaving people with few choices and sometimes meaning they are more likely to have to sleep rough.

Investment in LHA will significantly improve the ability of councils and private landlords to support people to move on from homelessness and find a stable job and home. It is a crucial element of reducing homelessness, and of fulfilling the Westminster Government's commitment to end rough sleeping in England by 2027 and the duties placed on local authorities to prevent and relief homelessness under the Homelessness Reduction Act.

- **Introduce national provision of private rented access schemes across England including a national rent deposit guarantee scheme to improve access to stable, decent private tenancies for homeless people and help local authorities procure properties more easily as part of their prevention and relief duties**

While the allocation of £19.5 million investment in help to rent services is welcome, this does not go far enough to meet the scale of need identified. Further funding is needed to deliver both help to rent projects and a national rent deposit guarantee scheme to enable access across the whole of England. Not only is access to a rent deposit guarantee essential for clients who have been homeless

and cannot afford to pay a cash deposit, it will also increase local authorities access to the PRS to meet their prevention and relief duties. The schemes help reduce the financial risk to the landlord in case of any damage to the property. A national deposit scheme guaranteed by the government would also reduce the burden on individual schemes. It would also provide help to rent projects with greater financial security so they can support more people.

4.4 Review the way that the Government invests in homelessness to ensure a sharper focus and investment in prevention measures, and evidenced based, housing-led solutions to ending homelessness.

4.5 Introduce an outcomes and performance framework to provide consistency and accountability across policies and service delivery of the HRA at a national and local level.

The MHCLG should put in place a shared outcomes and performance framework for all homelessness provision to ensure that investment is directed to evidence-based interventions, delivering the best value for money for Government. This would also better ensure that any additional funding for local authorities is being spent on effective prevention services and therefore ensuring that the intention of the Homelessness Reduction Act is fully met. This must be a central focus of the government current review into homelessness and local accountability structures.

The MHCLG should commit to longer-term funding budgets for preventing and ending homelessness, providing greater financial stability and security to deliver tailored, housing-led solutions, particularly for people with multiple complex support requirements that necessitate access to services over a prolonged basis. This would include moving away from current funding arrangements which often involves the creation of discreet pots of money for local authorities to bid for as this system does not necessarily ensure that areas with the highest level of need receive the appropriate funds.

4.6 Increase use of case management within Housing Options teams to more efficiently manage caseloads and resources, triage and assess applicants on the basis of support and housing needs and connect with local services.

4.7 Increased investment and support for local authorities to develop personalised housing plans, focusing on what good looks like and helping them to use them to achieve better housing outcomes for homeless people.

Local authorities reflected that caseloads that are more aligned with intensive case management practice were more suited to delivering the HRA. Our practice work has identified that some staff are reporting that developing PHPs with 'wrap around' responses are just not possible within the timeframes they have when interviewing clients and developing PHPs. Some staff have caseloads between 100 and 200 and they can only provide the bare minimum and encourage the client to respond to their immediate needs (i.e. find accommodation) as opposed to responding to issues that may have contributed to their homelessness/risk of homelessness. Local authorities have identified that PHPs have value in their function as a support plan, but this is only the case when considered as part of a holistic case management approach with a good quality interview and the assessment process. We are continuing to work with local authorities to share best practice and tools to improve the PHP process and embed a case management approach and we are keen to share our experiences with national and local government to help support an improvement in practice.

Appendix 1 – Research methodology

Crisis' In On The Act research, is a largescale three year project funded by the Oak Foundation that provides insight in to the newly implemented Homelessness Reduction Act (HRA). The research is being conducted across six local authorities across England and consists of three primary research elements which will be repeated annually: a survey completed with over 500 Housing Options clients per year, follow up in-depth interviews with around 50 survey respondents and local authority stakeholder interviews in each case study area.

The survey fieldwork cited in this briefing was carried out between April 2018 and November 2018, with interviews taking place in January and February 2019, and the local authority interviews across February and March 2019. The table below shows the response rates across the six areas:

	Number of surveys	Number of in-depth interviews
Local authority A	78	9
Local authority B	110	9
Local authority C	100	9
Local authority D	77	7
Local authority E	93	9
Local authority F	87	8
Total	545	51

Research participants were primarily identified through local authorities with participating Housing Options collating referral contacts at initial engagement stage and prior to any outcomes achieved. This was done to minimise risk of bias within the sample and ensure that we were speaking to a range of case types. A series of outreach fieldwork days were also conducted to engage harder to reach populations. An on-line survey was also available with the link distributed primarily via local

authorities. The in-depth interviews were conducted as follow ups with a subset of survey respondent.

Full analysis of the data and published report will be published following the second wave of fieldwork in late 2019, however initial analysis of baseline data has been conducted to inform this paper.

Alongside this Crisis are also supporting five local authorities in developing and delivering best practice in their implementation of the HRA. Three local authorities included in the best practice work are also represented in the research sample. Examples from the practice work are included within this report.