

Welsh Government

Consultation – summary of responses

Proposed changes to homelessness data collections

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Proposed Changes to Homelessness Data Collections User Consultation - Results

Summary

A user consultation was conducted to ask for views on proposed changes to both the amount and frequency of information collected and published on statutory homelessness. These changes are proposed following changes to statutory homelessness legislation arising from the Housing (Wales) Act 2014, which is due to be introduced at the end of April 2015. The proposals aim to enable the collection of more detailed annual data covering all aspects of the new legislation and to reduce the data collected and published quarterly to headline information to ensure the information being collected is proportionate and minimises the burden on providers.

The proposed changes were:

1) Changes to the data collected quarterly including:

- Increasing the data items collected on Table 1 (Households for which assistance has been provided during the quarter) to cover the prevention and relief of homelessness in line with the requirements of the new Homelessness legislation including :
 - Households eligible but not threatened with homelessness
 - Households eligible, threatened with homelessness, prevention assistance provided (Section 66)
 - Households eligible, homeless and subject to duty to help secure under Section 73
 - A breakdown of single person households for each decision type
 - The number of unsuccessful cases of prevention and relief due to 'Assistance refused' and 'Non-co-operation'
- Dropping the following tables:
 - Tables 3 (Households found to be eligible for assistance, unintentionally homeless and in priority need during the quarter by category of priority need)
 - Table 4 (Households found to be eligible for assistance, unintentionally homeless and in priority need during the quarter by main reason for loss of last settled home)
 - Table 6 (Households leaving accommodation provided under S193 and S194)
- Reducing the amount of detail collected on Table 5 (Homeless households temporarily accommodated by your authority at the end of the quarter, by household type and length of time) in relation to time spent in temporary accommodation.

2) Changes to the annual data collection including:

- Increasing the data items collected on Table 1 (Households for which assistance has been provided during the year) the annual data collection form in line with the requirements of the new Homelessness legislation including information on the age and gender of applicant.
- Introduce a new annual detailed table Table 2 covering all cases where positive action either succeeded or did not succeed in preventing or relieving homelessness.
- Introduce 3 new annual tables (Table 4a, 4b and 4c) in line with the new legislation. These will cover the main reason for households threatened with homelessness under Section 66, those homeless and subject to a duty to secure under Section 73 and those homeless but not in priority need or in priority need but intentionally so. These new tables will sit

along an existing table, now known as Table 4d, which will cover the main reason for loss of home for households accepted as eligible, unintentionally homeless and in priority need.

- Introduce a new detailed table (Table 5) covering all households for which decisions were taken during the year, by ethnicity in line with the requirements of the new legislation including all the new categories added to Table 1 of the form.
- Introduce changes to the current Table 6 and renumber to Table 7 to cover those households for whom final duty under Section 75 of the statutory homelessness legislation has ended, by reason duty has been discharged.

3) Changes to the publication of statutory homeless data including:

- Publish 3 quarterly headlines covering summary information on actions taken by local authorities under the new homelessness legislation and one annual release instead of 2 quarterly headlines and two bi-annual releases, one covering the July to September quarter and one covering the January to March quarter and the year as a whole.
- Continue to publish all data items collected on the Stats Wales website with less data items available quarterly in line with the reduction in data being collected,

The purpose of this consultation was to meet the following objectives:

- To ensure the new information requirements resulting from the Housing Act (Wales) 2014, in particular, those relating to the prevention and relief of homelessness, are able to be delivered
- To ensure the information being collected is proportionate and minimises the burden on providers.
- To ensure that relevant and useful headline information continues to be publically available each quarter and annually a full analysis of the activities undertaken by local authorities to prevent or relieve homelessness under the new legislation.

Findings

Prior to this consultation, local authority data providers and key stakeholders were consulted informally on the proposals outlined above.

There were 16 responses to this official consultation which ran from 4 March 2015 to 1 April 2015. This report includes a summary of responses as well as some direct quotes where relevant.

Many thanks to all those who took the time to respond to both this official user consultation and to the previous 2 week informal consultation.

The user consultation showed that:

- 75 per cent of respondents agreed with the proposed changes to the quarterly data collection form to be introduced with effect from the April to June quarter 2015 with only one respondent disagreeing.

Decision: We will make the change to the data collected on the quarterly statutory homelessness data collection from the April to June quarter 2015 which will be issued to data providers at the end of June 2015.

- 69 per cent of respondents agreed with the proposed changes and additions to the annual data collection form for 2015-16 onwards and only one respondent disagreed.

Decision: We will make the proposed changes to the annual data collection form for the 2015-16 financial year onwards. The new annual data collection form for 2015-16 will be issued to data providers at the end of March 2016.

- 69 per cent of respondents agreed with the proposal to replace the two quarterly headline and bi-annual release with three quarterly headlines and one detailed annual release covering all activity under the new legislation. Only one respondent disagreed.

Decision: We will publish three quarterly headlines covering summary data for April to June, July to September and October to December each year and an annual release covering the January to March quarter and the year as a whole. We will continue to publish all data collected quarterly and annually on Stats Wales.

We will ensure that a complete set of clear and precise guidance and definitions for completion of the new quarterly and annual homelessness returns is available and published alongside this summary report. A training seminar for local authority data providers and members of the Homelessness Network will take place on Thursday 30th April 2015 aimed at clarifying any outstanding issues in relation to completion of the returns and ensuring consistency of understanding and approach. Guidance will also be provided in relation to the information to be collected between 1 April 2015 and 27 April 2015 when the new legislation comes into force.

Following implementation the Welsh Government will continually monitor and review the impact of these changes to ensure users needs continue to be met and that the quality of information published is not adversely affected.

Introduction

A summary of the background to the consultation is provided in this report. The full background to the consultation is available in the consultation document:

<http://gov.wales/consultations/statistics/proposed-changes-homelessness-data-collections/?lang=en>

Currently, data on homelessness are collected on a quarterly basis from the 22 local authorities and covers their actions under the homelessness provisions of the Housing Act 1996.

Homelessness statistics are one of our highest profile housing outputs. The information is published in a quarterly statistical headline and bi-annual release, which is used by the Welsh Government to develop and monitor policies on homelessness. It is also used by the Welsh Government in local government settlement calculations. Local authorities and other housing organisations use the information to monitor the national and local picture with regards to homelessness, as well as for performance monitoring and planning purposes.

The latest statistical release is available here:

<http://gov.wales/statistics-and-research/homelessness/?lang=en>

The latest data collection forms are available here:

<http://gov.wales/statistics-and-research/homelessness-data-collection/?lang=en>

The Housing Act (Wales) 2014 became law in Wales on 17 September 2014. The Housing Act (Wales) 2014 included a number of changes to homelessness legislation aimed at reducing levels of homelessness by placing prevention at the centre of local authority duties to help people at risk. The changes to statutory homelessness legislation arising from the Housing (Wales) Act 2014 are due to be introduced on 27 April 2015.

The Welsh Government have been working closely with local authority data providers since the spring of 2014, to assess the new data requirements resulting from the Housing Act (Wales) 2014 and, in particular, those relating to the prevention and relief of homelessness. Limited summary information covering actions taken by local authorities to prevent or relieve homelessness has already been collected, on a voluntary basis, since 1 April 2014, as part of the regular quarterly statutory homelessness data collection. The aim being to use this as base line information for evaluating the impact of the new legislation, once introduced in April 2015.

The new information requirements involved in centrally monitoring the legislative changes and ensuring they are being consistently applied across all local authorities in Wales are considerable.

To ensure the new requirements are able to be delivered and to minimise the burden on data providers, it will not be possible to collect all of the extra data requirements arising from the new homelessness legislation on both a quarterly and an annual basis. The usability of the extra detail on a quarterly basis, given the low numbers for some data items also means there would be little value in collecting this information quarterly and it would represent a disproportionate burden on data providers.

Between December 2014 and February 2015 a series of discussions had been held with policy colleagues and relevant local authority representatives to formulate proposals for changes to the data collected following the introduction of the new legislation in April 2015. All local authority data providers and key stakeholders including Shelter Cymru, Tai Pawb and the Homelessness Network for Wales were also informally consulted on these proposals during February 2015.

A Welsh Government consultation was then held, in accordance with the Official Statistics Code of Practice, to allow all users to comment on these proposed changes to the data collection returns from April 2015 onwards as well as the proposed changes to the way the homelessness information is published.

The consultation was open for a period of 4 weeks rather than the more usual 12 week period, from 4 March 2015 to 1 April 2015 as all key stakeholders had already been informally consulted on the proposals. It was also necessary to finalise and inform data providers of all agreed changes to the data items collected prior to the implementation of the new legislation on 27 April

The rationale for the proposed changes was included in the consultation documents which were published via the website which is available at the following link:

<http://gov.wales/consultations/statistics/proposed-changes-homelessness-data-collections/?status=closed&lang=en>

Methods

Respondents were asked if they agreed with the proposed changes to the homelessness data collections from April 2015 onwards as well as the changes to the way the information would be published. The questions used in the consultation are attached in the Annex A.

The background document explaining the consultation and the response form were accessible via the Welsh Government consultations website. Emails to a wide group of potential users of housing statistics were sent out inviting response to the consultation. These included devolved and central government, local government, housing associations, third sector organisations, various housing bodies and housing networks. Responses were received in Excel response forms or as emailed comments.

Results

16 responses to the consultation were received, 10 using the Excel response form and 6 in the form of an e-mail. Of the 16 respondents, 11 stated that they were happy to be identified in this report and they are listed in Annex B. The number and percentage of responses by type of organisation and a summary of the responses are provided in the following tables:

Organisation	Number of Responses	Percentage of Responses
Local Authority	11	69%
Other Third Sector	5	31%
Total	16	100%

Response Summary Table

Questions	Yes	No	Did Not Respond	Total
Question 1 - Do you agree with the proposals to change the data collected quarterly on statutory homelessness as outlined in Proposal 1 of the attached consultation paper .	12	1	3	16
% of responses to this question	75%	6%	19%	100%
Question 2 - Do you agree with the proposal to change/extend the data collected annually on statutory homelessness as outlined in Proposal 2 of the attached consultation paper .	11	1	4	16
% of responses to this question	69%	6%	25%	100%
Question 3 - Do you agree with the proposal to changes to the publication of data on statutory homeless as outlined in Proposal 3 of the attached consultation paper?	11	1	4	16
% of responses to this question	69%	6%	25%	100%

The following pages give more detail on the responses provided to each of these questions.

Question 1

Do you agree with the proposals to change the data collected quarterly on statutory homelessness as outlined in Proposal 1 of the attached consultation paper?

What are your reasons for this, including any impact this change might have on your work?

There were 16 responses received in relation to this question. Of these, 12 (75 per cent) agreed with the proposal with only one respondent disagreeing. The comments provided in these responses included the following:

- “We foresee no major impact to existing reporting processes.”
- “The rationalisation of the data that needs to be reported on Quarterly is perceived as justified and not anticipated to have any material effect on the local Housing Options Service.”
- “We agree in terms of if you want to change to collect data annually in some cases instead of quarterly, this will not make any impact on us as we will move to collect it monthly in any case. This will mean we can track any errors and be able to identify them quickly whereas it is a lot more work if there are any queries and we have to identify them over a 12 month period.”
- “Table 1 changes reflecting refusal of assistance or non-co-operation from clients will give a more informed report of Homelessness activity. The reduction of detail in current table 5, but new Table 6 is welcomed and will reduce time spent on this particular return. The annual collection of Tables 3,4, and 6 instead of quarterly will reduce reporting time a little, although we shall still collect locally to ensure changes of trends can be recognized and any increases in specific areas identified.”
- We understand the rationale for reducing the burden of quarterly collection and so we support this proposal. Although the proposed new quarterly collection will only give a bare minimum of data, it’s good to see that single person households will be disaggregated.

One respondent (6 per cent) did not agree with the proposals and the reasons given were as follows:

- We do not agree with the proposal to no longer collect Tables 3, 4 and 6 on a quarterly basis. Given the recent changes to homelessness legislation, it is vital that the government continues to publish data regularly in order to track the impact of these changes. This would also ensure that statistics are collected and published on a similar timetable to England, allowing for more consistent comparison of the impact of divergent policies and trends in homelessness. With regards to Table 6 (homeless households temporarily accommodated by your authority at the end of a quarter), we do not agree with the proposal to reduce the amount of detail that is required from April 2015. It is vital that the government continues to collect information on the length of time by accommodation type...”

However the respondent did welcome the proposal to collect extra information on single person households by all decision types quarterly from April 2015 and included the following comment:

- ...we strongly welcome the government’s proposals to start collecting a breakdown of single person households for each decision type.... Currently this data is only recorded in Scotland and we welcome the government’s plan to do this. Without reliable data on this breakdown the task of fully monitoring the impact of this policy on single homeless people is exceptionally challenging.”

There were 3 respondents (19 per cent) who did not state whether they agreed or disagreed with the proposals to change the data collected quarterly on statutory homelessness and the comments provided in these responses included the following:

- “The proposals need further clarification to ensure all LA’s are reporting the same data. i.e. clear guidance is required to understand what duty is being triggered to ensure we don’t double count..... This will reduce the burden on the collection of data quarterly.

- We welcome the Welsh Government's proposals to collect information annually on prisoners who are homeless or at risk of becoming homeless.... Homelessness and risk of homelessness can significantly impact on an offender's risk of reoffending. For this reason we would suggest that a quarterly basis would be more appropriate in order to identify any issues or trends at an earlier stage"

Concerns were raised by a number of respondents about the need for clear and precise guidance in completing the proposed new data collection forms. Comments included the following:

- "clear guidance is required to understand what duty is being triggered to ensure we don't double count."
- "Agree in the main because it will be less work at the end of each quarter to complete the form however there was no guidance attached to the tables and the inclusion of this may have answered some of my queries as to clarification on what is actually to be reported in the various rows of Table 1."
- "There's also the training needs to ensure advice staff are recording the necessary new information. These are no negative comments as these changes are fundamental with the implementation and monitoring of the new legislation, however there will be challenges in preparation and implementation."
- I have concerns as to how we are going to record the first quarters figures due to the legislation due to be implemented on the 27th of April.... I also feel it would be extremely helpful to have the guidance/definitions for both the quarterly and annual forms before July so we can ensure that data is being recorded correctly...."

Discussion

The majority (75 per cent) of those who responded to this proposal were in favour of reducing the amount of detailed information on statutory homelessness collected and published quarterly.

The new information requirements involved in centrally monitoring the legislative changes arising from the Housing (Wales) Act 2014 from the end of April 2015 are considerable. The usability of the extra detail on a quarterly basis, given the low numbers for some data items means there would be little value in collecting this information quarterly and it would represent a disproportionate burden on data providers. Therefore by reducing the data collected and published quarterly to headline information we will ensure the information being collected is proportionate while minimising the burden on data providers.

Under these proposals, we would continue to collect quarterly information on all decisions made by local authorities on those households presenting as homeless or threatened with homelessness as in the existing table 1. From April 2015 however we would collect additional information on a quarterly basis in Table 1, in line with the new homelessness legislation covering the following:

- Households eligible but not threatened with homelessness
- Households eligible, threatened with homelessness and prevention assistance provided under Section 66 of the new legislation
- Households eligible, homeless and subject to duty to help secure under Section 73 of the new legislation
- The number of unsuccessful cases of prevention and relief due to 'Assistance refused' and 'Non-co-operation'
- A breakdown of single person households for each decision type

Headline information on homeless households in temporary accommodation at the end of the quarter by accommodation type will continue to be collected and published along with the number of households with children in each of the different accommodation types.

By no longer collecting information quarterly in Tables 3 and 4 covering the main priority need and main reason for the loss of home for those households accepted as homeless (eligible, intentionally homeless and in priority need) from April 2015 we would significantly reduce the burden on the data providers while the information currently collected in Table 6 on those leaving temporary accommodation will no longer be relevant under the new legislation.

Only one respondent disagreed with these proposals and the main concern appeared to be the loss of comparability with England and the loss of information on length of time spent in temporary accommodation. Under these proposals we will still be collecting and publishing similar quarterly headline information on decisions and homeless households in temporary accommodation to that in England and to a similar timetable. The legislative changes introduced from 27 April in Wales will not apply to England and, as outlined above, will require the collection of additional information both quarterly and annually which will not be collected in England. The respondent welcomed the extra information to be collected quarterly on single person households which again is not currently collected in England. While the proposals would mean information is no longer collected quarterly on length of time homeless households spend in temporary accommodation, this information will still be collected and available on an annual basis for analysis and comparison purposes.

Although not available at the time of the consultation, a complete set of clear and precise guidance and definitions for completion of the new quarterly and annual homelessness returns will be available and published alongside this summary report. A training seminar for local authority data providers and members of the Homelessness Network has also been arranged for Thursday 30th April 2015 aimed at clarifying any outstanding issues in relation to completion of the returns and ensuring consistency of understanding and approach. Guidance will also be provided in relation to the information to be collected between 1 April 2015 and 27 April 2015 when the new legislation comes into force.

Conclusion

With effect from 1 April 2015 onwards we will make the following changes to the data collected quarterly including:

- Increasing the data items collected on Table 1 of the quarterly data collection form in line with the requirements of the new Homelessness legislation
- Dropping Tables 3, 4 and 6.
- Reducing the amount of detail collected on Table 5 in relation to time spent in temporary accommodation.

Question 2

Do you agree with the proposal to change/extend the data collected annually on statutory homelessness as outlined in Proposal 2 of the attached consultation paper?

What are your reasons for this, including any impact this change might have on your work?

There were 16 responses received in relation to this question. Of these, 11 (69 per cent) agreed with the proposal to increase the amount of detailed information collected annually in line with the legislative changes introduced in April 2015. Only one respondent disagreed.

The comments provided in these responses included:

- “Given the extended timescales for working with households under the new framework, annual reporting allows time for comprehensive data completion which will assist with providing effective data outcomes at year end.”
- “Table 3 (S75) annual collection welcomed. Table 4a introducing threatened with homelessness and reasons and household type will reflect additional work undertaken in the service and enable more analysis of demands and trends. Table 4b (S73) duty to help to secure-these figures will again reflect additional work and will help to inform forward planning. Tables 4c and 4d are welcomed as an annual collection and will overall save some time although figures will be collected locally. Completion of table 5 will depend on clients' responses. Table 6 is as now (original table 5) and Table 7 (original table 6) has been extended but this is not felt to be an onerous task and should not overly increase the burden on the reporting Authority.”
- “The fact that ethnicity data will be collected in relation to prevention, relief and other duties is very positive.....it will enable us to see more important details related to equality in service provision and explore the application of new duties in relation to different groupsSuch data will be extremely valuable as it will provide us the basis for assisting local authorities (and the Welsh Government) in addressing some of the barriers that BME people may be facing in relation to homelessness assistance. The data will also enable the Welsh Government to assess the success of the new duties in relation to different ethnic groups”
- “We agree that it is reasonable to collect a more detailed level of data on an annual rather than quarterly basis. However, there are still some gaps in the proposed annual collection forms.”

There was 1 respondent (6 per cent) who did not agree with the proposal and the comments included with their response are as follows:

- “..... there is little value in attempting to comment on the detail of the changes. The concern for front-line supervisory operational staff in the service is rather around the volume of manual work associated with collating data that has not previously been required and so will not be recorded anywhere in the new/updated IT systems that is currently being developed in advance of April 27. “

There were 4 respondents (25 per cent) who did not state whether they agreed or disagreed with the proposals to increase the amount of detailed information collected annually in line with the new legislation. Some of the comments from these respondents included the following:

“Changes are required and necessary to align returns on introduction of the new legislation.....These additions will require significant amendments to the current systems and result in the need of a new suite of reports. There is also the training needs to ensure advice staff are recording the necessary new information. These are not negative comments as these changes are fundamental with the implementation and monitoring of the new legislation, however there will be challenges in preparation and implementation....”

“If authorities are required to record just one intervention in Table 2, this is going to obscure a lot of activity and will hamper our understanding about what works, since lesser interventions will be under-reported. For this reason we recommend that numbers of applications and interventions are recorded separately..... Tables 4a-d will be useful in giving us some elementary data on household make-up which we have previously lacked. “

“We agree the importance of this data collection, however LA's will need to consider how they monitor this collection throughout the year, to ensure the final data is correct, particularly within this first transitional year. This will increase the burden on LA's.”

As with the proposed changes to the quarterly returns, concerns were also raised about the need for clear and precise guidance in completing the proposed new annual return. Some of the respondents queried the proposed level of detail for equalities information to be collected, particularly in relation to the ethnicity groupings and the lack of decision level information for disability, gender re-assignment and sexual orientation. The comments included the following:

- “Main concerns are clarification over the guidance....”
- “.....I also feel it would be extremely helpful to have the guidance/definitions for both the quarterly and annual forms before July so we can ensure that data is being recorded correctly - There are still some grey areas when looking over the tables. “
- “We note that the new ethnic groups used in Table 5 are not broken down into detailed ethnic groups. This will prevent Welsh Government from accessing data on homelessness amongst e.g. White Other category (a big part of which consists of EU migrants). This may be problematic, considering new limitations for migrants in relation to access to housing and other benefits and current anecdotal reports of migrants being made homeless as a result. However, considering the amount of new data collected, we understand that it may be unreasonable (at least at the moment) to require this level of data no other equality data is collected in relation to the decisions and now success of the new duties (as shown in Table 5 for ethnicity). We would strongly encourage the Welsh Government to collect data on disability, gender re-assignment and sexual orientation in relation to all decisions (as shown in Table 5 for ethnicity)....”
- “The tables only appear to ask for information on all protected characteristics in relation to violence or harassment leading to homelessness. This is only going to capture a tiny proportion of all equalities groups, and won't be comparable with the data on Table 2.”

Discussion

The majority of respondents were in favour of the proposed changes and additions to the annual data collection forms as these are in line with the legislative changes which will be introduced on 27 April 2015. We will need to collect sufficient detailed information centrally, in order to monitor how the new legislation is being implemented by local authorities across Wales, from April 2015 onwards, and to ensure it is applied consistently and correctly across all 22 local authorities.

The proposed new information collected annually will cover all activities undertaken by local authorities to prevent and relieve homelessness under Sections 66, 73 and 75 of the new legislation. In order to monitor the impact of the new legislation on those applying to their local authority for housing assistance, we propose to collect information on the age, gender, household type and the ethnicity of all new applicants. The proposed new tables 4a to 4d will also ensure that information on households made homeless or threatened with homelessness due to violence or harassment which is racially motivated or due to disability, religion, sexual orientation or gender re-assignment will be available for all decisions made by local authorities during the year under the new legislation and not just those accepted as homeless under Section 75. This is sufficient for current analysis and monitoring needs.

Only one respondent disagreed with the proposals and the comments provided suggest the main concern related to the amount of extra work involved in manually collating data which their current IT systems were not set up to record rather than the changes themselves.

Whilst the proposals will aggregate some of the ethnicity categories, the information provided will continue to provide sufficient detail for current annual analysis purposes and for UK comparisons. Disaggregated information would be available directly from the local authorities should it be required for a particular purpose.

The detailed information on age and gender in Table 1 and on ethnicity in Table 5 could be extended to cover the other protected characteristics such as disability, gender re-assignment and sexual orientation. However the usability of the extra detail given the low numbers for some data items even on an annual basis would mean there would be little value in collecting this information and it would represent a disproportionate burden on data providers. Should the information be required for a specific purpose it would be available directly from the local authorities who are required to collect this level of detail under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011.

As stated above, a complete set of clear and precise guidance and definitions for completion of the new annual homelessness returns will be available and published alongside this summary report and a training seminar for local authority data providers will take place on Thursday 30th April 2015 aimed at clarifying any outstanding issues and ensuring consistency of understanding and approach in completion of the returns. Guidance will also be provided in relation to the information to be collected between 1 April 2015 and 27 April 2015 when the new legislation comes into force.

Conclusion

Having assessed the views of respondents the decision has been taken to go ahead with making changes to and extending the amount of data collected on the annual statutory homelessness return from April 2015 onwards in line with the legislative changes introduced in April 2015. This will include:

- **a new annual detailed table (Table 2)** covering all cases where positive action either succeeded or did not succeed in preventing or relieving homelessness. For those successful cases of prevention and relief, we propose to also collect information on the type of action taken.
- **new annual detailed table (Table 4a) covering** all households threatened with homelessness under section 66 of the new legislation during the year by reason for being threatened with homelessness and household type
- **new annual detailed table (Table 4b) covering** all eligible, homeless households subject to a duty to help secure accommodation under Section 73 of the new legislation during the year, by reason for loss of home and household type.
- **new annual detailed table (Table 4c) covering** all eligible, homeless households who are either not in priority need or who are in priority need, but intentionally so during the year, by reason for loss of home and household type
- **a new detailed table (Table 5) covering** all households for which decisions were taken during the year, by ethnicity
- **a change to existing table 6 (Table 7) covering** those households for whom final duty under S75 has ended, by reason duty has been discharged

The first annual return will cover the period 1 April 2015 to 31 March 2016 and will be issued at the end of March 2016. Guidance will be provided as to what should be included for the period from the 1 April 2015 to the introduction of the new legislation on 27 April 2015.

Question 3

Do you agree with the proposal to changes to the publication of data on statutory homeless as outlined in Proposal 3 of the attached consultation paper?

What are your reasons for this, including any impact this change might have on your work?

A total of 16 responses were received in relation to this question. Of these, 11 (69 per cent) agreed with the proposal to change to publishing 3 quarterly headlines covering summary data for April to June, July to September and October to December each year and one annual release covering the January to March quarter and the year as a whole. Only one respondent did not agree with the proposal. The comments provided in these responses included:

- “Yeshappy with the proposal to change the publication of data. I feel that it is really important that this information is collated to monitor the impacts of welfare reform on homelessness.”
- “The rationalisation of the data that will be published is perceived as justified and not anticipated to have any material effect on the local Housing Options Service.”
- “No significant impact. I think the focus needs to be on getting the guidance right thereby ensuring the correct data is being completed by each local authority. If not it makes the whole concept of comparing data across Wales pointless.”

One respondent (6 per cent) did not agree with the proposal for the reasons outlined below:

- “We do not agree with the proposal not to publish the following information on a quarterly basis: priority need and main reason for loss of home; the length of time households have been in temporary accommodation; and the information on households leaving temporary accommodation for the reasons stated aboveGiven the recent changes to homelessness legislation, it is vital that the government continues to publish data regularly in order to track the impact of these changes. This would also ensure that statistics are collected and published on a similar timetable to England, allowing for more consistent comparison of the impact of divergent policies and trends in homelessness.”

There were 4 respondents (25 per cent) who did not state whether they agreed or disagreed with the proposals in relation to changes in the publication of statutory homelessness information from April 2015 onwards. Only one comment was provided by these respondents as follows:

- “Don't understand what difference the changes will make (apart from the reduced quarterly data).”

Discussion

The majority of respondents agreed with the proposal to change the way the statutory homelessness information for April 2015 onwards is published by the Welsh Government.

Only one respondent disagreed with the proposal. The main concerns expressed were the need for Welsh Government to publish data regularly to allow the impact of the recent legislative changes to be monitored effectively and a loss of comparability with England.

As previously stated however, under these proposals we will still be collecting and publishing similar quarterly headline information to that in England on statutory homelessness, covering households accepted as homeless and homeless households in temporary accommodation, and to a similar timetable.

The legislative changes introduced from 27 April in Wales however will not apply to England so that from April 2015 onwards we will be collecting and publishing additional information which may not be strictly comparable with the data collected and published in England. This will include actions taken by local authorities under Sections 66 (households eligible but not threatened with homelessness, households eligible, threatened with homelessness and prevention assistance provided) and Section 73 (households eligible, homeless and subject to duty to help secure) of the new legislation. All of this information will be available quarterly on Stats Wales at an all Wales and individual local authority level.

The UK government currently publish information for England on homelessness prevention and relief which takes place outside the statutory homelessness framework. Summary headline information is published quarterly via Excel tables and more detailed information annually via a statistical release available at the following links:

<https://www.gov.uk/government/statistics/homelessness-prevention-and-relief-england-2013-to-2014>

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

In Wales, from April 2015 onwards the Welsh Government will publish quarterly headline information on prevention and relief activity which is within the statutory framework of the new legislation as well as more detailed analysis via an annual statistical release and Stats Wales tables.

Under these proposals, any decrease in the amount of detail available on a quarterly basis will be offset by the increased information available on an annual basis. The usability of the extra detail on a quarterly basis, given the low numbers for some data items also means there would be little value in collecting and publishing this information quarterly and it would represent a disproportionate burden on data providers.

While data will no longer be published quarterly on Stats Wales covering the priority need and main reason for loss of home for households accepted as homeless and on the length of time households have been in temporary accommodation, this information will be published and available on an annual basis along with additional information covering the following:

- All cases where positive action succeeded or did not succeed in preventing/relieving homelessness by the type of action taken
- Households found to be threatened with homelessness during the year by main reason for being threatened with homelessness by type of household under Section 66 of the new legislation
- Households found to be eligible, homeless subject to duty to help to secure during the year by main reason for loss of last settled home by type of household under Section 73
- Households found to be eligible, homeless but not in a priority need or homeless, in a priority need but intentionally so during the year by main reason for loss of last settled home by type of household.

From April 2015 onwards, whilst we will no longer publish quarterly information on households leaving temporary accommodation we will publish annual information covering those households for whom final duty under Section 75 has ended, by reason duty has been discharged in line with the new legislation.

A full analysis of this information will be published in the form of an annual statistical first release and all data items collected will also be published on Stats Wales at all Wales and individual

local authority level. This will enable the Welsh Government to effectively monitor the full impact of the recent legislative changes and to ensure that the legislation is being applied consistently and correctly across all local authorities.

Conclusion

The decision has been made to carry out the proposed changes to the information published on statutory homelessness. These changes involve replacing two quarterly headlines (April to June and October to December quarters) and two bi-annual releases (the July to September quarter and the January to March quarter and year as a whole) with three headlines covering summary data for April to June, July to September and October to December each year along with an annual release covering the January to March quarter and the year as a whole.

All the information collected quarterly and annually will continue to be published on Stats Wales at an all Wales and individual local authority level. On a quarterly basis the data items would be reduced in line with the reduction in data being collected, as outlined above.

This would ensure that relevant and useful headline information continues to be publically available each quarter and can be used to assess the impact of the new legislation. The headline information would continue to be available at an individual local authority level each quarter on Stats Wales.

Annually, a detailed statistical release will be published providing full analysis of the activities undertaken by local authorities to prevent or relieve homelessness under the new legislation, along with information on the applicants. A full data set at an individual local authority level will continue to be available on StatsWales.

General comments

Some respondents also provided more general comments in relation to issues which were not specifically addressed by questions 1 to 3 of the consultation form.

Comments received included the following:

- "...we have concerns that there is no further breakdown of age bands for people 'Age 25 and over'. We deem that it is important that local authorities collect more detailed information on the age of applicants so that figures more accurately identify and reflect the reality of homelessness in Wales among all age groups. We would welcome a further breakdown of age bands for applicants aged 25 and over, to include 'age 50 - 64' and 'age 65 and over'.

Response: We are aware of these concerns however it was not an issue which was included within the remit of this consultation.

- "Homelessness and risk of homelessness can significantly impact on an offender's risk of reoffending. For this reason we would suggest that a quarterly basis would be more appropriate in order to identify any issues or trends at an earlier stage. We therefore propose the following key data indicators (broken down by age range, gender and ethnicity):
 - numbers of adult prisoners sentenced by a court in Wales who are homeless on entry to prison, by last home LA,
 - numbers of adult prisoners who are homeless on release from prison by resettlement LA,
 - numbers of adult prisoners referred to LAs as homeless prior to or on release, who were accepted as vulnerable and given priority housing status.

In addition, the following data indicators would be very useful for operational and strategic planning purposes:

- a breakdown of initial placement type by home LA (e.g. hostel, bed and breakfast, supported housing, specialist provision, tenancy)
- numbers of adult prisoners receiving housing support in a 12 week term post release, broken down by
- numbers of prisoners in sustained successful placements
- numbers of prisoners in failed placements"

Response: The proposals include collecting annual information on former prisoners who are vulnerable as a result of being held in custody and those who are threatened with homelessness or are homeless due to being a prison leaver. While we are aware of the value of the types of information/key indicators listed above, it would not be practical as part of the quarterly or annual statutory homelessness data collection to include this level of detail for just one client group. We need to take into account the burden on local authority data providers and the impact on resources involved in collecting this level of detail. The probable low numbers for some of these indicators at a local authority level particularly on a quarterly basis would also be an issue and would represent a disproportionate burden on data providers.

- "...our work has highlighted a number of areas where data collection could be further strengthened. The consistency of data collection from Welsh local authorities has to be improved.... Rough sleeping. In comparison to England and Scotland, there is no data collected by the Welsh government on rough sleeping. In England, the Department for Communities and Local Government oversee annual street counts to estimate the number of people sleeping rough on anyone night in each local authority. While this type of data collection does not necessarily capture the true scale of the problem, it is extremely useful in tracking trends in rough sleeping. In Scotland, local authorities collect information from people seeking homelessness assistance about whether they have slept rough prior to presenting. The Welsh government should consider adopting preferably both, but at least one of these methods of data collection.

Overcrowding. The Welsh Homelessness Monitor estimated that overcrowding affected around 26,000 households (2%) in Wales. There is however, no trend data available on overcrowding. This is something that the Welsh government should collect more detailed information on, particularly given the increase in housing costs and the high demand for homes.”

Response: The provision of a clear and concise set of guidance and definition notes for the proposed new quarterly and annual returns from April 2015 should help ensure that local authority data providers adopt a consistent approach to their completion. A training day on 30th April 2015 is also aimed at addressing any issues and queries and ensuring consistency of understanding and approach. Rough sleeping and overcrowding did not form part of the remit for this consultation but the views expressed will be passed on for consideration to relevant policy leads within the Welsh Government.

“I would just stress that not monitoring prevention duty by disability in particular (only by race, sex and age) is very risky as you will have no evidence as to whether the new duty is fair or unfair (and accessibility of information, advice and assistance etc. is one of the issues which is most often questioned by disabled people). So it is about balancing this risk against the risk of being overburdened with data.”

Response: We are aware that it would be useful to have more detailed prevention duty information for all of the 9 equality strands including disability. However it was agreed that due to possible low numbers for some of the data items, particularly at an individual local authority level, the disclosure rules would make the information unusable and collection would represent a disproportionate burden on data providers. We will however keep the issue under review.

Conclusion

Having considered all the information gathered during the consultation it has been decided to go ahead with all the proposed changes to both the quarterly and annual homelessness data collection returns with effect from 1 April 2015.

The changes outlined below will be implemented for data collections that cover the 2015-16 financial year onwards:

Proposal 1 – Changes to quarterly data collection

Table 1 – Households for which assistance has been provided during the quarter

We will continue collecting this existing table quarterly, but also collect additional information from April 2015, as required by the new homelessness legislation covering the following:

- Households eligible but not threatened with homelessness
- Households eligible, homeless and subject to duty to help secure under Section 73
- A breakdown of single person households for each decision type
- The number of unsuccessful cases of prevention and relief due to 'Assistance refused' and 'Non-co-operation'

Table 6 – Homeless households temporarily accommodated by your authority at the end of the quarter

This table is currently Table 5. We will continue collecting this information quarterly but reduce the amount of detail required from April 2015. The table will cover information on the number of homeless households in temporary accommodation at the end of the quarter, including the number of families with children in each accommodation type. However, information on length of time by accommodation type will no longer be collected quarterly.

Table 3 – Households found to be eligible for assistance, unintentionally homeless and in priority need during the quarter by category of priority need.

We will no longer collect Table 3 on a quarterly basis from April 2015 onwards. Similar information will be collected on an annual basis.

Table 4 – Households found to be eligible for assistance, unintentionally homeless and in priority need during the quarter by main reason for loss of last settled home.

We will no longer collect Table 4 on a quarterly basis from April 2015 onwards. Similar information will be collected on an annual basis.

Table 6 – Households leaving accommodation provided under S193 and S194.

We will no longer collect Table 6 on a quarterly basis from April 2015 onwards

Proposal 2 – Changes to the annual data collection

Table 1 – Households for which assistance has been provided during the year, by age and sex of applicant.

We will collect all the information collected on the quarterly form, but also the age and gender of the applicant.

Table 2 – All cases where positive action succeeded or did not succeed in preventing/relieving homelessness.

We will introduce this as a **new annual detailed table** covering all cases where positive action either succeeded or did not succeed in preventing or relieving homelessness. For those successful cases of prevention and relief, we propose to also collect information on the type of action taken.

Table 3 – Households found to be eligible for assistance, unintentionally homeless and in priority need during the year: Categories of priority need by type of household (section 75).

Table 3 is an **existing table**. We will continue to collect this detailed information on priority need and household type on an annual basis.

Table 4a – Households found to be threatened with homelessness during the year. Main reason for being threatened with homelessness by type of household (Section 66).

We will introduce this **new annual detailed table**. It will cover all households threatened with homelessness under section 66 of the new legislation during the year, by reason for being threatened with homelessness and household type

Table 4b – Households found to be eligible, homeless subject to duty to help to secure during the year. Main reason for loss of last settled home by type of household (Section 73).

We will introduce this **new annual detailed table**. It will cover all eligible, homeless households subject to a duty to help secure accommodation under Section 73 of the new legislation during the year, by reason for loss of home and household type.

Table 4c – Households found to be eligible, homeless but not in a priority need or homeless, in a priority need but intentionally so during the year. Main reason for loss of last settled home by type of household.

We will introduce this **new annual detailed table**. It will cover all eligible, homeless households who are either not in priority need or who are in priority need, but intentionally so during the year, by reason for loss of home and household type

Table 4d – Households found to be eligible, unintentionally homeless and in priority need during the year. Main reason for loss of last settled home by type of household (Section 75).

Table 4d is an **existing table**. We will continue to collect this detailed information on households eligible, unintentionally homeless and in priority need during the year by reason for loss of home and household type.

Table 5 – Households for which decisions were taken during the year, by ethnic group of applicant .

We will introduce this **new detailed table** covering all households for which decisions were taken during the year, by ethnicity.

Table 6 – Homeless households temporarily accommodated by your authority at the end of the quarter, by household type and length of time.

This is an **existing table** (currently Table 5). We will continue collecting this table.

Table 7 – Reasons for discharge of duty under section 75 during the quarter.

This is an **existing table** (currently Table 6), but we will change the table in terms of title, guidance and definitions. The table will cover those households for whom final duty under Section 75 has ended, by reason duty has been discharged.

As previously stated final versions of both the quarterly and annual data collections for 2015-16 are published alongside this summary report including a complete set of definitions and guidance for completion of the returns. In the light of comments received from data providers during both the informal and formal consultation and following discussions with relevant policy colleagues some

changes have been made to the data collection returns to help improve and clarify coverage and to ensure compliance with the new legislation. These changes include:

In Table 1 (Households for which assistance has been provided during the quarter/year) extra rows have been added to cover 'Other Reasons' for unsuccessful prevention under Section 66, unsuccessful relief under Section 73 and unsuccessful discharge of duty under Section 75. Full guidance on what to include will be provided.

In Table 2 of the annual return (All cases where positive action succeeded or did not succeed in preventing/relieving homelessness) there have been the following changes:

- The addition of row 4(xii) to read 'Of the total cases `able to remain in existing home', how many received support from a Supporting People service?
- Row 5(i) now reads 'Any form of non self-contained accommodation'
- Row 5(ii) now reads 'Self-contained supported accommodation'. This now replaces the previous row 5 (v) which read 'Supported accommodation (including supported lodging schemes, successful referrals to supported housing projects'.
- The addition of row 5(x) to read 'Of the total cases `assisted to obtain alternative accommodation', how many received support from a Supporting People service?'

The Row numbers have been adjusted accordingly and definitions and full guidance on what to include within each row has been provided. Guidance will also be provided in relation to the information to be collected between 1 April 2015 and 27 April 2015 when the new legislation comes into force.

A training seminar for local authority data providers will take place on Thursday 30th April 2015 aimed at clarifying any outstanding issues and ensuring consistency of understanding and approach in completion of the returns.

ANNEX A

Questions asked

Name

Organisation

Job Title

Email address

Do you wish to be identified as the author of your response? (mandatory question)

Q1. Do you agree with the proposals to change the data collected quarterly on statutory homelessness as outlined in Proposal 1 of the attached consultation paper ?

What are your reasons for this, including any impact this change might have on your work?

Q2. Do you agree with the proposal to change/extend the data collected annually on statutory homelessness as outlined in Proposal 2 of the attached consultation paper ?

What are your reasons for this, including any impact this change might have on your work?

Q3. Do you agree with the proposal to changes to the publication of data on statutory homeless as outlined in Proposal 3 of the attached consultation paper?

What are your reasons for this, including any impact this change might have on your work?

ANNEX B

List of responders *(who stated that they were happy to be identified)*

Name	Organisation
Rachel Gronow	Rhondda Cynon Taf County Borough Council
Jonathan Flower	Bridgend County Borough Council
Matthew Hughes	Denbighshire County Council
Gareth Evans	Neath Port Talbot County Borough Council
Kelly Jones	Powys County Council
Alicja Zalesinska	Tai Pawb
Ian Jones	Vale of Glamorgan
Jenny Bibbings	Shelter Cymru
Serena Baxter	Wrexham County Borough Council
Hayley Lancaster	Conwy County Council
Kelly Davies	Pembrokeshire County Council