



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

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## Executive Summary

### 1. Research aims and methodology

- 1.1 The Housing Act (Wales) 2014 introduced major changes to the way homelessness is being addressed (from April 2015), with the core changes in Part 2 of the Act<sup>1</sup> aimed at extending services preventing homelessness and providing assistance to all eligible applicants. A longitudinal post-implementation evaluation of this part of the Act, which focuses on both process and impact, is now complete.
- 1.2 The overall aim of the evaluation is to understand how the Act has been implemented by organisations involved in supporting people at risk of homelessness (local authorities, housing associations and third sector organisations). The research will inform the Welsh Government's understanding of the impact of the Act on people who are homeless/at risk of homelessness.
- 1.3 The specific evaluation objectives are as follows:
  - To evaluate the implementation of the legislation by local authorities.
  - To evaluate the short and longer term impacts of the new legislation.
  - To identify the need for further improvements, developments and support to ensure consistently good services are delivered across Wales.
  - To assess the impact of the legislation on service users, local authorities and key partners.
  - To evaluate the impacts on homelessness of the much greater emphasis on prevention that is a core feature of the Housing (Wales) Act 2014.
- 1.4 The evaluation comprised two waves of fieldwork. The final report presents the findings from the second wave of fieldwork and reviews relevant findings from the interim report.
- 1.5 The Housing Act (Wales) 2014 – implemented in April 2015 - introduced a number of changes in the way that homelessness is addressed in Wales. The main changes include:
  - The introduction of new duties for local authorities to help prevent homelessness for anyone who asks for help<sup>2</sup> and the duty that authorities carry out 'reasonable steps' to prevent or relieve homelessness.

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<sup>1</sup> Throughout the report this is referred to as the Act.

<sup>2</sup> Applications can be submitted by a third party on behalf of someone, but the individual must have given consent.

- More flexible interventions by local authorities to ensure more effective prevention of homelessness.
- A change in organisational culture to underpin a person-centred/partnership approach between local authorities and people who come forward for assistance<sup>3</sup>.
- Increasing the length of time when people are considered to be threatened with homelessness from 28 days to 56 days and extending the prevention duty to all, not just those in priority need.
- Changes in the application of priority need, intentionality and local connection provisions.
- Creating a new framework to involve housing associations.
- Creating a new framework to work with the private rented sector in alleviating homelessness.

1.6 The Act aims to ensure that:

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

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

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

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

### **Consultation with national stakeholders**

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

- Community Housing Cymru (1).
- Chartered Institute of Housing Cymru (1).
- Cymorth Cymru (1).
- Higher Education institution (1).
- Homelessness Network (1).

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<sup>3</sup> The use of Personal Housing Plans was recommended in the Code of Guidance but they are not a statutory requirement

- Shelter Cymru (2).
- Private Landlords Association (1).
- Take Notice Project (1).
- Welsh Local Government Association (1).
- Welsh Government Housing Policy Division (4).
- Tai Pawb (1).
- Chartered Institute of Housing (1).

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

### **Local authority survey (first wave)**

- 1.11 The purpose of the survey was to gather both qualitative and quantitative information relating to the different stages outlined in the Act. The survey was developed by the research team following guidance from the Welsh Government and key stakeholders from across Wales, and piloted with one local authority to check the content prior to rolling out to the rest of the local authorities.
- 1.12 Responses (one from each local authority housing team) were obtained between 4<sup>th</sup> July and 25<sup>th</sup> August 2016. Key contacts in the local authority housing teams were sent an email from the Welsh Government introducing the survey including a link to the survey. Subsequent reminder emails were sent by the research team and the Welsh Government until a response had been received from each local authority (i.e., 100% response rate).

### **Local authority survey (second wave)**

- 1.13 The second wave survey again aimed to gather both qualitative and quantitative information relating to the Act, but more specifically, to understand changes in the experiences of the local authority housing team in the year since they completed the first wave survey. The survey was largely based upon the first wave survey, with some modifications to capture recent changes, a broader range of information (for example, questions were added on steps taken to maintain contact with households that miss appointments and how local authorities determine that a household has refused to co-operate), and to better facilitate categorisation of responses.
- 1.14 The second wave survey was administered in much the same way as the first: key contacts in the local authority housing teams were sent an email including a link and introducing the survey. A 100% response rate (i.e., one response from each local authority) was again achieved following reminder emails from the research team and the Welsh Government. Responses (one from each local authority housing team) were obtained between 11<sup>th</sup> August and 2<sup>nd</sup> October 2017<sup>4</sup>.
- 1.15 Respondents to the local authority survey are referred to as such throughout the findings chapters.

### **Selection of case studies**

- 1.16 Six case studies were selected on the basis of geography: urban/rural/coastal and north/mid/south Wales and whether housing stock had been retained by the local authority or transferred to a

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<sup>4</sup> See Annex 1 for the Local Authority Survey Wave 2

Registered Social Landlord (RSL)<sup>5</sup>. Additional criteria extrapolated from Stats Wales, including performance based on homelessness successfully prevented (s66) and relieved (s73) also guided selection. Other studies currently being conducted by Shelter Cymru<sup>6</sup> and the Wales Audit Office<sup>7</sup> were also taken into account, although this did not necessarily preclude inclusion.

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

- 1.17 One of the key components of this evaluation was to explore the impact of service changes from the perspective of the people who have received support. In order to understand the experiences of services and the impact of the support people have received, the first wave of longitudinal qualitative research was undertaken with people who presented to homelessness services in each of the case study areas.
- 1.18 The project team worked in partnership with case study local authorities to gain access to a sampling frame to ensure that respondents with a demographic spread were accessed including: those who are homeless/at risk of homelessness; a range of household types; and people with protected characteristics. Members of the research team were located at the offices of participating local authorities where appropriate as this offered the most effective means by which to recruit participants in wave 1.
- 1.19 The research team aimed to interview 25 service users in each case study area in the first wave in anticipation of some attrition over the six to eight month period. In total, 154 interviews were conducted across the six local authority areas and the sample was influenced by the people who presented as homeless or were receiving assistance from the local authorities during the time of the fieldwork. Most of the interviews were arranged by local authority and hostel staff and conducted at local authority offices, or hostels and shelters. While the initial goal was to interview people as they approached the local authority for help for the first time, this only proved possible in urban areas where the volume of people seeking help was high enough to do so. For more rural areas, the initial sampling strategy was adapted and expanded to include people who were already receiving services. Researchers spent additional time in these areas, and conducted phone interviews where requested.
- 1.20 The purpose of collecting data from service users was to gain knowledge about their lived experiences of accessing and navigating services and experiences of prevention and pathways to support. Participants were given the option to have interviews conducted in Welsh or English, (all opted to be interviewed in English).
- 1.21 After the completion of a wave 1 interview, participants were asked for their permission to be re-contacted in six to eight months. All interviewees agreed and when asked, provided the research team with their contact details, and in many cases the contact details of family members, friends and/or support workers who could be contacted. After six months, all those participating in wave 1 of the research were re-contacted and invited to attend a second interview.

### **Case Study: Engagement and consultation with service users [Second wave: June–July 2017]**

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

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<sup>5</sup> Eleven out of 22 local authorities have transferred stock to an RSL

<sup>6</sup> In Cardiff, Vale of Glamorgan, Ceredigion, Flintshire, Conwy and Rhondda Cynon Taf

<sup>7</sup> In Bridgend, Carmarthenshire, Denbighshire, Merthyr Tydfil and Swansea

collected by the research team. In some instances service users' families were unaware of their whereabouts. Numerous attempts were made to re-contact interviewees via phone call, text, email and letter (including through the details of second and third contacts). The study team also found wide variation in the knowledge among local authority staff regarding the circumstances of individual cases. Where possible information from local authority/hostel staff/service users' family members has been included to indicate the housing situation of service users at the time of the second wave of the research. The most complete information about people's housing circumstances at the second wave of interviews was obtained from those case study areas where the study team worked with hostel staff to identify service users to participate in the research. In total, 57 people were interviewed and the housing situation of 87 people was verified (the circumstances of 67 people were unknown).

- 1.23 Service users were asked a range of questions aimed to elicit details information about their housing circumstances. Most interviews took place face to face and some were conducted by telephone (at the request of the service user).

### **Interviews with service providers (March – June 2017)**

- 1.24 During this phase, consultations with a variety of service providers were undertaken representing the statutory sector, RSLs and the Third Sector across the six case study sites. The research team endeavoured to consult across these sectors in each site, collecting the views and experiences of key stakeholders including heads of service, Supporting People leads, service managers and frontline staff.
- 1.25 Six case studies were selected on the basis of geography (urban/rural/coastal and north/mid/south Wales) and whether housing stock had been retained by the local authority or transferred to an RSL. In total 148 people took part in consultations. Seventy nine were employed in the statutory sector, 24 were employed by Registered Social Landlords and 45 represented the Third Sector. In terms of the role of participants, this covered the spectrum of positions from frontline officers, to team and service managers, as well as leads and heads of departments. The study team also interviewed councillors who held relevant portfolios and people employed in very specific roles that were linked to a particular area of practice: for example, officers mandated to work with prison leavers, or officers with a specialist knowledge of mental health (as well as homelessness). As such, including people from different sectors, in addition to people who occupy different roles, has enabled a multitude of perspectives and experiences to be collected as data informing this evaluation.
- 1.26 A total of 148 service providers across a range of sectors and authorities were consulted. Consultations were undertaken between March and June 2017<sup>8</sup>.

## **2. Key findings**

### **Secondary analysis of homelessness statistics**

- 2.1 While there are limits in the extent to which comparisons can be made due to previous data quality issues, a number of key changes can be seen from the 2015-16 data:
- There have been increases in the number of outcomes recorded at each stage when compared to 2015-16. Most outcomes now take place under s73 (duty to help secure accommodation).
  - Allocation of local authority social housing has overtaken private rented sector (PRS) accommodation as the most frequent action taken to prevent and relieve homelessness in Wales. This figure is striking given that only 11 of the 22 local authorities have retained their own housing stock.

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<sup>8</sup> See Annex 3 for a detailed analysis of the consultation with service providers across the case study areas

- The proportion of households deemed to have become homeless intentionally, and refusing to co-operate has reduced at s75.

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

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

## **Impact and processes of the Act**

- 2.3 There was unanimous support for the ethos and intent of the Act, from respondents to the local authority survey and among service providers. There is evidence of increased prevention activity and improved outcomes for service users. Similarly, 'reasonable steps' have been strategically embraced by local authorities and this has also resulted in better outcomes for people presenting as homeless/threatened with homelessness. The Act therefore, provides a framework within which it is possible to prevent and relieve homelessness for a wide range of people who would not have been included under the previous arrangements.
- 2.4 However, there is significant variation across Wales and also within local authority areas regarding the extent to which the ethos of the new Act has been adopted and the effectiveness of prevention and reasonable steps: this is a concern.
- 2.5 There is evidence of variation in the interpretation of intentionality and local connection. Intentional homelessness was seen by a minority of service providers as a means of gatekeeping access to services; however, the majority felt it to be counter to the ethos of the Act and detrimental to achieving positive outcomes.
- 2.6 Successful implementation of the Act is contingent on a number of factors: the skills, expertise and behaviour of staff delivering the service (particularly frontline, first point of contact staff); and also upon structural factors, for example the availability and affordability of housing in a particular area.
- 2.7 Being responsive to local needs and individual circumstances needs to be balanced with ensuring a uniform interpretation of 'reasonable steps', in particular to avoid disadvantaging people with vulnerabilities and complex needs (this is discussed further below).
- 2.8 Of the 87 service user interviewees whose housing situation could be verified during the second wave of fieldwork, 50 had been successfully rehoused (33 in social housing, 17 in the PRS). However, a significant number remained in insecure housing six months after they presented as homeless (21) and nine people were rough sleeping.

- 2.9 Additionally, although 21 out of 22 local authorities confirm that they take steps to maintain contact with service users who miss appointments with Housing Solutions staff, a further concern is the 64 people whose housing circumstances could not be verified. In most instances cases had been closed by local authorities – often cited as ‘failure to cooperate’ – but the reasons for this were not always clear.

### **Implementation and Administration**

- 2.10 Most local authorities reported significant challenges in implementing the Act. Such challenges include an increased administrative burden; more bureaucratic working arrangements; and higher and more complex workloads for Housing Solutions staff. The issue of resources is also considered a significant challenge for the successful future implementation of the Act (discussed below).
- 2.11 The Code of Guidance is considered useful as a reference document (its intended purpose). However, there were some suggestions made regarding how it could be more user-friendly.
- 2.12 Some RSL and third sector service providers indicated that they had not received any training regarding the Act, and there was variation among local authority staff in terms of the timing, quality and amount of training received. The evaluation shows that service users valued being listened to and not judged, therefore, arguably, service providers now need additional skills – e.g. negotiation; empathic practice; and motivational interviewing – than previously. Staff not being equipped with the requisite skills can negatively impact on the outcomes for service users and compromise the implementation of the Act.
- 2.13 It is apparent that for local authorities completing/submitted statistical returns, it is an onerous process. There are also issues regarding the quality of the data due to variation in recording practices across authorities. Significantly, the data does not always capture the work being undertaken, particularly around prevention.

### **Person-centred practice and culture change**

- 2.14 The shift in culture to outcome focused person-centred practice from process driven assessment is a work in progress across Wales. The adoption of a new organisational culture and approach to tackling homelessness is also variable across Wales (and within authorities) and evidence suggests that there is resistance to change, particularly among staff who worked under the previous arrangements. This impacts on the outcomes for service users and it is clear that continued work is needed to properly embed the person-centred culture of the Act. It is evident that not all local authority staff have fully committed to the ethos of the new Act since gatekeeping and assessment persist in some areas.
- 2.15 Personal Housing Plans (PHPs) appear to be instrumental in promoting person-centred practice, and service providers were overwhelmingly positive about using them, despite the increased paperwork involved. PHPs appear to be instrumental for Housing Solutions Teams in embedding the person-centred ethos of the Act. However, PHPs do not seem to be benefiting service users, who report not finding them particularly useful, so more work is needed to optimise the benefits for service users.
- 2.16 Navigating new systems introduced by the Act poses challenges for some service users, and receiving multiple letters throughout the process can be confusing rather than helpful.

### **Partnership working**

- 2.17 It is evident that there is strategic support for partnership working among local authorities across Wales. There is also evidence that partnership working has increased between and within local authorities, and with RSLs and third sector service providers. However, again, there is much variation within and between local authorities.

- 2.18 There are examples of positive partnership working arrangements with Social Services. However, successful partnership working between homelessness and health and mental health services in particular remains an area where significant improvements could be made.
- 2.19 In general, successful partnership working appears to develop as a result of individual relationships between service providers rather than strategically. There is significant evidence of successful partnership working among third sector organisations, but again this is often contingent upon individual relationships rather than being strategically driven.
- 2.20 Similarly, a legacy of poor relationships between individuals across sectors can perpetuate difficulties in working collaboratively.
- 2.21 Additional obstacles to developing and embedding partnership working include conflicting agendas/priorities. For example, local authority emphasis might be on preventing eviction, while RSLs may prioritise wider neighbourhood/community concerns.
- 2.22 The use of gateways/pathways is generally viewed positively at strategic level, although service providers and service users report challenges in navigating multiple systems.

### **The Private Rented Sector**

- 2.23 Although respondents to the local authority survey and service provider participants in the research accepted the role of the PRS in addressing homelessness, there were significant misgivings about how this operates in practice. Concerns centre on: the lack of available affordable accommodation – one bed properties in particular; insecurity of tenure; the poor condition of some properties; and the unwillingness of some private landlords to rehouse people in receipt of welfare benefits.
- 2.24 The welfare system also impacts on the use of the PRS. There are fears about the future impact of Universal Credit, levels of benefit, and limits to local housing allowance, particularly for people under 35 years of age.
- 2.25 In addition there are obstacles to people accessing the private sector as a result of lettings agency fees and unaffordability for those on low incomes.
- 2.26 Some concerns exist around the experience of private landlords in supporting vulnerable people and their willingness to rehouse people with multiple needs.
- 2.27 Social lettings agencies appear to be positive and useful to forge good relationships with private landlords.
- 2.28 There were mixed views with regard to Rent Smart Wales. It has established a regulatory framework for the PRS, but there is a perception that it may have discouraged some smaller private landlords from renting out properties. Additionally, it has not implemented a minimum standard for accommodation.

### **Vulnerable Groups**

- 2.29 Single people experienced poor outcomes under the previous legislation. It is important to note however, that under the new Act, that the outcomes for single people are still poor as they often remain without a solution after all stages. This can partly be attributed to a lack of affordable appropriate accommodation and the increasing complexity of people's needs.
- 2.30 The number of young people presenting as homeless/threatened with homelessness appears to be increasing, and often their housing needs are also compounded by the co-existence of other issues, e.g. poor mental health and substance misuse.
- 2.31 Restricted financial support for people under 35 years of age is also a potential obstacle to resolving young people's homelessness. Placing people with complex needs in shared accommodation poses additional challenges.

- 2.32 Poor mental health affected the majority of service users who participated in the study. Many people had pre-existing conditions, while others reported a deterioration in their mental health as a result of experiencing homelessness or a precarious housing situation. Significantly, securing accommodation for people with mental health problems was reported as the biggest challenge facing service providers. Clearly this is an issue which requires attention.
- 2.33 It is evident that people with undiagnosed mental health conditions experience challenges in accessing support services. Additionally, those people who are not deemed to meet a threshold by mental health services struggle to access support. People with more severe mental health services also face challenges if there is insufficient support. Housing Solutions teams are not specialist mental health professionals and also need support to effectively assess people's needs.
- 2.34 As indicated above, partnership working between homeless and mental health services is often lacking, which negatively impacts on service user outcomes.
- 2.35 It is clear that previous experiences of the care system can endure and have longer term impacts on people's housing stability.
- 2.36 In addition, challenges remain with regard to service provision for people fleeing Domestic Violence and Abuse; outcomes appear to be contingent upon location, with some local authority areas being more responsive at the first point of contact than others.
- 2.37 The National Prisoner Pathway appears to work much more effectively where a motivated and dynamic Prison Resettlement Officer (sometimes funded through Welsh Government transitional funding) is in place.
- 2.38 Since the introduction of the Act, rough sleeping has increased across Wales. In stark terms, people who are rough sleeping, cannot have their homelessness prevented and often do not meet the vulnerability threshold to be considered as being in priority need. Therefore, they do not receive a rehousing duty at the final stage of the legislation. Additionally, often people have entrenched problems (mental health issues and substance misuse). Again, shortage of suitable accommodation compounds these issues.
- 2.39 There is a lack of robust monitoring across authorities in Wales, and there is evidence of a lack of clarity regarding responsibility for equalities monitoring under the 2010 Equalities Act.

### **Structural Challenges**

- 2.40 There are a number of significant structural challenges which will impact on the successful implementation of the Act.
- 2.41 It is clear that local authorities are preventing homelessness on an individual basis and reacting to homelessness and the problems it causes; however, the structural causes of homelessness remain unaddressed by the Act. Increased demand for services since the introduction of the Act is also challenging, compounded by a lack of available accommodation for people to move people to. This impacts on local authorities' ability to effectively prevent and relieve homelessness.
- 2.42 The work of Welsh Government and local authorities is shaped by social policies established by UK Government, particularly in relation to welfare benefits.
- 2.43 Welfare Reform in particular is problematic and undermines the prevention/person-centred ethos of the Act. In practical terms Welfare Reform will reduce the resources available to low income households in Wales and impact on their ability to afford private sector rents. This is a significant concern, as the successful implementation of the Act is contingent on local authorities' ability to discharge homelessness duties through the PRS.
- 2.44 Additionally, the roll out of Universal Credit is expected to exacerbate challenges to tackling homelessness. Often people do not have the experience or skills to budget/manage money and increases in debt/rent arrears are likely to lead to eviction and increase homelessness.

- 2.45 The complexity of the welfare system is likely to confuse people and also potentially negatively impact on their income levels.
- 2.46 The deficit between benefit payments and rent levels may also impact on affordability in the PRS.
- 2.47 Although local authorities have received extra funding to implement the legislation, and levels of Supporting People funding has remained relatively stable, the main local authority settlement has reduced. Such reductions to local authority budgets have also resulted in reductions in support services - e.g. tenancy support – which again will negatively impact on levels of homelessness. In addition, the short-term funding for third sector providers poses a further challenge.
- 2.48 The impact of the Bedroom Tax and the lack of single person accommodation also negatively impacts on single people.
- 2.49 The variable geography and demographics of Wales means that there is no uniform picture and each local authority area (rural/coastal/urban) faces different challenges. In particular, delivering face-to-face services in rural areas can be problematic.

### **3. Conclusions**

- 3.1 The overwhelming consensus is that the new statutory homelessness framework ushered in by the Act has had an array of positive impacts. It has helped to shift the culture of local authorities towards a more preventative, person-centred and outcome-focused approach, which has meant a much-improved service response to tackling homelessness.
- 3.2 The official statistical returns bear this out, with almost two-thirds of households threatened with homelessness having it prevented and two-fifths of homeless households being relieved of homelessness
- 3.3 As expected, the number of priority need households assisted under the new ‘duty to secure accommodation’, activated only after prevention and/or relief efforts have failed, is much lower than statutory homeless ‘acceptance’ levels under the pre-2015 system
- 3.4 However, rough sleeping is rising in Wales and it is universally recognised across local authorities and among service providers that rough sleepers have benefited least from the recent legislative changes. There is growing recognition that something needs to be done.

### **4. Recommendations**

- 4.1 The recommendations are presented below in order of priority, with some designated as for immediate action (priority recommendations), others as medium-long term recommendations and the remainder as future considerations.

#### **Priority recommendations**

##### *Priority recommendations to optimise the outcomes for service users*

- 4.2 Local authorities should conduct holistic assessments, which go beyond housing need to uncover any additional unmet needs.
- 4.3 Personal Housing Plans are useful for staff and have been instrumental in changing the culture in Housing Solutions Teams; however, since they appear to be less useful for service users, more collaboration between Housing Solutions and service users is needed in setting priorities to ensure that the PHP is tailored to the circumstances of each individual. A strategic steer should be provided by Welsh Government in the Code of Guidance and outcomes should be better monitored by local authorities.

- 4.4 Homelessness services need to be physically accessible: face to face contact is the most person centred. Rural authorities should consider providing 'floating' mobile advice surgeries.
- 4.5 Local authorities should streamline communication processes with service users and maintain regular communication with them. There should be requirements in place to maintain contact (within data protection regulations), for example by weekly text as a minimum. Local authorities should monitor this.
- 4.6 There needs to be more flexibility for people with vulnerabilities with regard to the interpretation of reasonable steps – reasonable steps need to be tailored to the individual rather than standardised across all clients; full account needs to be taken of capacity. There needs to be more robust monitoring by local authorities of individual cases, and efforts made to maintain contact with people who present as homeless. There also needs to be closer monitoring around failure to cooperate as so many people fall outside the system.
- 4.7 Welsh Government should continue to develop the Welsh Housing First Approach.. As this develops, mental health, substance misuse services and the Police should be involved as key strategic partners

*Priority recommendations to optimise the successful implementation of the Act*

- 4.8 Since progress in implementing the Act is variable across Wales, sharing and embedding good practice across local authorities is needed. This should be done via the Homelessness Network<sup>9</sup> and included as a regular agenda item. Local authorities should consider establishing cross-local authority visits/shadowing/peer exchange to learn about how different problems are dealt with in different areas
- 4.9 The Welsh Government could make the Code of Guidance more accessible and user-friendly by indicating where amendments have been made (for example, through listing amendments in an annex), and including hyperlinks in the pdf document for ease of navigation. At the next redraft, for greater clarity, the Welsh Government should produce a 'Best Practice Guide' including scenarios as a separate document from the Code of Guidance.

*Priority recommendations to improve partnership working*

- 4.10 There needs to be a clear understanding of the nature and remit of partnerships across authorities in order to optimise the use of resources, avoid duplication of services and achieve the best outcomes for service users. Welsh Government should ensure that organisations they fund are working appropriately with local authorities. Local authorities should consider establishing service level agreements with their partners and set out clear standards regarding partnership working. Contracts should also be closely monitored by local authorities. Local authorities should introduce information sharing protocols between health and housing services, and between Housing Benefit and Housing Solutions, drawing on established service level agreements.
- 4.11 Local authorities should work with RSLs to prevent evictions and increase tenancy sustainability, for example, by conducting joint interviews before court hearings. It would be useful if RSLs could profile tenants at risk of eviction to establish support. Support packages should be flexible and recognise that some service users need long-term, not time-bound support. Supporting People services should not automatically end when homelessness is addressed.

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<sup>9</sup> Newport Home Council now manages the Homelessness Network on behalf of the other 21 local authorities in Wales

### *Priority recommendations for developing local authority services*

- 4.12 The information available for service users should be improved. It needs to be up to date and in an accessible format. Local authorities should update information on websites as a priority. This information should be monitored by local authorities and reviewed by the Homelessness Network. The bureaucracy working group should be re-established to explore communication processes.
- 4.13 All local authorities should appoint a Prison Resettlement Officer and ensure that the person appointed to the role has the requisite skills and support and receives appropriate training.
- 4.14 There is a need for more and ongoing training for staff, not just focusing on the technical detail/provisions of the Act but on its ethos and impacts on practice. The skill set required to successfully implement the Act - motivational interviewing; customer service; empathy; mediation; problem solving; liaison; person-centred practice; counselling; mental health awareness - also needs to form the basis of training. Training also needs to be rolled out to non-statutory partners. The Welsh Government should work with the Homelessness Network and local authorities to evaluate how training needs could best be met.
- 4.15 Mentoring for staff in housing teams should also be considered by local authorities. This should be available to all staff, including those with a number of years of experience so that staff at all levels receive ongoing support and are able to develop. Appropriate line management support – and clinical support where appropriate - should also be available to ensure the well-being of frontline staff.
- 4.16 In order to mitigate the impacts of Welfare Reform, local authorities need to be more aware of the impacts of Universal Credit and how to manage delays in the system. Learning from authorities who have implemented Universal Credit should be shared via the Homelessness Network. Local authorities should use discretionary housing payments to facilitate homelessness prevention.
- 4.17 Budgeting and money management should form part of new tenant training. Service users should be signposted to employability and skills training as part of the implementation of reasonable steps. Each local authority should appoint a Welfare Reform Officer to focus on increasing income and reducing expenditure for service users.
- 4.18 The use of private rented sector officers and social lettings agencies should be rolled out across authorities and a standardised approach should be adopted by local authorities. This could be developed through the Homelessness Network.

### *Priority recommendations to optimise the role of the Private Rented Sector and provide support for private sector tenants*

- 4.19 The Welsh Government should explore how they can support private landlords and private sector tenancies to ensure consistency of services with RSL provision.
- 4.20 Local authorities should continue to work with private landlords to provide support (financial) and increase tenancy management support, particularly for tenants with vulnerabilities. More incentives should be in place for private landlords, including paying for repairs/rent arrears and using LA contractors to conduct repairs
- 4.21 Local authorities should provide more support for private landlords regarding tenants claiming Universal Credit Local authorities should consider establishing a Landlord Support Service in their area to ensure that they stay in the sector

### *Priority recommendations for changes in monitoring*

- 4.22 Keeping full records of reviews and appeals would help to provide a more accurate picture of local authority and service-user interpretations of the legislation and any differences between the two. It

would also allow more accurate monitoring in general and help the Welsh Government to identify areas where more guidance is needed.

- 4.23 IT infrastructures should support monitoring and tracking of individual cases. This should involve changing current data collection methods so that individual record data is collected (rather than aggregate tables). Along with helping local authorities better track individual cases, this would also allow for deeper analysis of the statistical data by researchers to better understand the situation of homeless households/those threatened with homelessness in Wales over time. Further guidance is needed on this from the Welsh Government.
- 4.24 Improved equalities monitoring by local authorities is required, with evidence needed of how such monitoring informs future practice. This should be reiterated and clarified further in the Code of Guidance by the Welsh Government.

#### *Priority recommendations to address structural challenges*

- 4.25 In order to meet homelessness strategies, local authorities should work with RSLs to increase the availability of appropriate accommodation through using Social Housing Grant funds. A suite of options should be considered – addressing the need for one and two bedroom properties to satisfy demand. This should be informed by an evidence base in each local authority area.

#### **Medium-long term recommendations**

##### *Medium- long term recommendations for legislative changes*

- 4.26 The Welsh Government has taken the first step of removing intentionality as households with children will be given ‘a second chance’ from 2019. Welsh Government should give all priority need households ‘a second chance’ and work towards removing intentionality for all households deemed to be in priority need.
- 4.27 Non-priority need homeless people should be accommodated in temporary accommodation for a period of up to 21 days to prevent rough sleeping. The Welsh Government should provide discretionary funds to local authorities to facilitate this. The Welsh Government should explore including rough sleeping as a priority need category.
- 4.28 There is a need for further research around local connection with a view to establishing a national reconnection service across in Wales. This could be jointly commissioned by the Welsh Government and the Welsh Government Local Government Association. All 22 local authorities in Wales would need to sign up to the national reconnection service and outcomes would need to be carefully monitored by the Welsh Local Government Association.
- 4.29 In line with Scotland’s Private Residential Tenancies Act (effective from January 2018), the Welsh Government should consider the introduction of rent caps in areas where rents are increasing rapidly.
- 4.30 Since ‘vulnerability’ is a highly subjective assessment, the Welsh Government should review the Code of Guidance with a view to establishing greater consistency and clarity, particularly with regard to age and mental health. There should be additional training for Housing Solutions staff regarding ‘the other special reason’ (vulnerability category) definition of priority need to ensure that people’s needs are fully assessed and captured.

##### *Medium-long term recommendations to optimise the outcomes for service users*

- 4.31 In order to promote tenancy sustainability local authorities should work towards aligning homelessness and Supporting People services. Local authorities commission Supporting People services to work with Housing Solutions teams to promote tenancy sustainability and early support

for service users. Support packages should include tenancy management, money advice, and employment and training advice and these should be regularly reviewed.

#### *Medium-long term recommendations to optimise the successful implementation of the Act*

- 4.32 Although significant financial investment has already been made, the Welsh Government needs to continue to provide funding to support local authorities post 2019/20. Funding will be needed to cover staff costs; skills training; and prevention. The Welsh Government should monitor homelessness levels and make adjustments to align resources to where the number of homeless presentations and rough sleeping has increased.
- 4.33 The Welsh Government should commission further research in order to understand how the use of gateways and the Homelessness Prevention Grant are influencing prevention, and best practice should be shared via a 'Best Practice Guide' as described above. The Homelessness Network should work with local authorities to take ownership of producing the Best Practice Guide.
- 4.34 The Hospital Discharge Protocol for Homelessness People<sup>10</sup> should be examined and its use reinvigorated to ensure that local authority housing teams are given sufficient notice to put arrangements in place for homeless people leaving hospital. Local authorities should consider establishing regional link workers to operate between hospitals and Housing Solutions Teams.

#### *Medium-long term recommendations to improve partnership working*

- 4.35 Better strategic alignment of agendas (homelessness/mental health/social services and well-being/RSL practice) is needed from the Welsh Government with the development of shared indicators capturing performance. Joint training regarding the underlying reasons of complex cases across local authorities, RSLs, third sector organisations and Shelter would be useful. Psychologically Informed Environment (PIE)<sup>11</sup> training would be appropriate to embed this. Strategic direction from Welsh Government is needed to ensure better engagement between housing services and mental health services. The Minister for Housing and Regeneration and the Cabinet Secretary for Health and Social Services should take joint responsibility for the rough sleeper strategy.
- 4.36 Evidence suggests that Supporting People services are more prevention focused when located in housing departments rather than social services. Local authorities should strengthen the commissioning and monitoring of Supporting People funding.

#### *Medium-long term recommendations for developing local authority services*

- 4.37 Local authorities should publish service standards detailing what service users can expect and these should be co-produced with service users, monitored by local authorities and audited by the Homelessness Network. Service standards should be written in user friendly language and an indication of timescales should be provided.
- 4.38 Appointing a mental health practitioner to work alongside Housing Solutions Teams would improve outcomes for people with mental health issues: this could operate in a similar way to the Prison Resettlement Officer. Housing needs assessments should include mental health assessments where appropriate to ensure that people receive support for mental health issues.

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<sup>10</sup> Published by the Welsh Government and Public Health Wales in 2014

<sup>11</sup> Funded by the Welsh Government and presented by Cymorth, Psychology based on Environmental training and aims to support the prevention of homelessness through the implementation of trauma based approaches to meet the needs of people in housing and support.

- 4.39 Local authorities should embed other services in Housing Solutions teams. For example, specialist mental health, debt advice and drug and alcohol co-ordinators should be included in Housing Solutions Teams/across authorities. The Welsh Government should also facilitate different services sharing their experiences of addressing homelessness and complex cases through funding PIEs training. Local authorities should take responsibility for staff attendance at such training to make sure that they are appropriately trained.
- 4.40 The first point of contact with services (i.e. frontline staff) is important. Local authorities could audit this by the use of 'mystery shoppers' and result in measures being put in place to support Housing Solutions staff. This could be facilitated by the Homelessness Network.
- 4.41 The Welsh Government should consider funding a bond scheme in each local authority area.

*Medium-long term recommendations to optimise the role of the Private Rented Sector and provide support for private sector tenants*

- 4.42 Local authorities should work with the PRS to explore whether longer tenancies (minimum of 12 months) would work for them in order to increase security of tenure for individuals.
- 4.43 The Welsh Government should explore the use of Section 21 notices with regard to the impact on tenants and housing supply for homeless households.

*Medium-long term recommendations for changes in monitoring*

- 4.44 In order to address current flaws in monitoring processes, greater standardisation among local authorities is necessary. The Welsh Government should review the existing guidance and provide more clarity regarding a standard approach to data collection among local authorities that captures the full range of activity in each local authority area, including from partner agencies as far as possible.

**Future considerations**

- 4.45 The Welsh Government should establish a regulatory body to monitor performance and partnership working across sectors and authorities.

A. Ahmed, M. Rogers, M. Wilding, A. Gibbons, K. Jones,  
I. Madoc-Jones  
Sustainable Housing & Urban Studies Unit (SHUSU)  
The University of Salford  
And  
Wrexham Glyndŵr University



**SHUSU**  
SUSTAINABLE HOUSING  
& URBAN STUDIES UNIT

PRIFYSGOL  
**Glyndŵr**  
Wrecsam

**Wrexham**  
**Glyndŵr**  
UNIVERSITY

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

For further information please contact:

Lucie Griffiths

Social Research and Information Division

Knowledge and Analytical Services

Welsh Government, Cathays Park

Cardiff, CF10 3NQ

Email: [lucie.griffiths@gov.wales](mailto:lucie.griffiths@gov.wales)

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