Shelter's response to the Housing Corporation's consultation on Tackling Homelessness

Appendix A – proposed new KLOE on addressing homelessness and housing need in the local area

Key Line of Enquiry	An organization delivering an excellent service	An organization delivering a fair service
Access, customer care & user focus • How effectively does the organisation communicate and consult with its stakeholders? • How easily do stakeholders access the service? • How clear and comprehensive are service standards from a stakeholder's perspective? • Does the organisation comply with the statutory requirements? • How does the	• Has staff that all demonstrate user focus in their work, who treat people with respect at all times when working with stakeholders. • Has front-line staff that demonstrate a wide range of knowledge about the full range of enquiries they receive in connection with their duties to assist the local authority or know who or how to access the necessary information to help stakeholders with their queries. • Offers a range of ways for service users and stakeholders to contact them – by telephone, in person or electronically – all of which are dealt with efficiently and effectively. • Has set challenging service standards in connection with the duties to assist the local authority and other stakeholders, which are tailored to meet local need. • Actively canvasses the views of stakeholders and uses them to review or improve the ability	• Has staff who generally have a reasonable approach to customer care, but examples of some staff providing an inconsistent approach to customer care. Individuals may have high standards, but it is not a strong enough part of the organisation's culture and customer care is therefore sometimes inconsistent. • Has front-line staff who demonstrate reasonable knowledge, but have some gaps in the range of knowledge about the enquiries they are likely to receive and are unclear where or who to access the information from, to be able to help stakeholders. • Offers a reasonable range of ways for stakeholders to contact the service, but some are not as efficient and effective as others, therefore providing inconsistent service provision. • Has set some key service standards, and having set them, has either not published them widely and/ or is not monitoring them. • Seeks stakeholders' opinions, but does not always act

organisation respond to service users and stakeholders? • What service user and stakeholder satisfaction has been achieved?	to work in partnership. Stakeholders are consulted and involved in major decisions that affect partnership working. Stakeholders feel confident that their input will be valued and acted upon. • Has stakeholders who report a high level of satisfaction with their ability to contact and work with the association.	on them. • Has a significant proportion of stakeholders who do not think they receive a good service in the context in which the organisation works, or the organisation does not know what their main concerns are.
Diversity • How does the organisation respond to the diversity of its community to ensure that all users, or potential users, have fair and equal access?	• Has a clear understanding of its local community using census and other information, including the input of local partners. • Knows, records, analyses and monitors information about the ethnicity, vulnerability and disability of service users and stakeholders and uses it to ensure services are delivered appropriately and to prioritise resources. • Provides information about services and service standards in a comprehensive range of languages and formats appropriate to service users' needs eg, large print, Braille,	• Has an awareness of its service user base and has made efforts to offer services to most service users. Has resources identified, but may not have allocated them yet to meet the needs of all service users. • Records some information about ethnicity, vulnerability (eg, domestic violence or learning difficulties) or disability, and partially uses it to inform service delivery and prioritise resources, but does not systematically collect all the information necessary to ensure comprehensive services for all. • Provides some information which is readily available in appropriate formats and other languages, but this is not comprehensive.

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	other languages etc. • Works with its component communities and stakeholders who represent particular communities to ensure fair representation. • Does not discriminate against any person or other organisation on the grounds of race, ethnic origin, disability, nationality, gender, sexuality, age, class, appearance, religion, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.	• Generally has a reasonable approach to diversity, but may have some aspects of the service which indirectly discriminate on the grounds of race, ethnic origin, disability, nationality, gender, sexuality, age, class, appearance, religion, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.
Nomination agreements How well can the association demonstrate that they are working in partnership with the local authority in drawing up, monitoring, and fulfilling nominations agreements? Are their nominations	Has set up service level agreements with the local authority in each relevant district covering nominations. These agreements are regularly monitored and an annual review is conducted in partnership with the local authority. These agreements cover not only the % of vacancies which are to be made available for local authority nomination, but set out a range of other policy and operational matters as detailed in the 2004 joint good practice guidance "Effective cooperation in tackling homelessness: nomination agreements and exclusions".	Has formal written nomination agreements in place with other housing partners, and monitors these to ensure the agreements are adhered to.

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agreements, and their interpretation and practical application of them, contributing effectively to fulfilling their duty to assist the local authority in meeting local housing need and addressing homelessness?	The association can demonstrate that, over the past year, it has accepted the first applicant nominated to a vacancy by the local authority in more than 75% of occasions. Any instances where the first applicant nominated (or any subsequent applicant) has been refused they can show clear reasons for the refusal, and that the refusal in each case is consistent with the association's allocations policy and the service level agreement held jointly with the local authority. A formal protocol exists for the resolution of any disputes over the suitability of nominations or refusals, the last stage of which involves referring the dispute to the Regional Housing Board. This protocol is followed and a record kept of individual cases where it has been invoked.	The association can demonstrate that, over the past year, it has accepted the first applicant nominated to a vacancy by the local authority in more than 50% of occasions. There is a written record of each applicant refused and the reasons for refusal. Discussions over the suitability of nominations are conducted on an ad-hoc basis, but there are no formal agreements as to criteria for suitability of nominations, or protocols for information sharing or dispute resolution in place.
Participation in homelessness strategy	The association is a member of the local Homelessness Forum, regularly attends meetings and actively contributes to the work of the forum.	The association is a member of the local Homelessness Forum.

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Can the association demonstrate a broad range of ways in which they are actively contributing to the drawing up and implementation of the local authority's Homelessness Strategy? Is the role they play locally in addressing homelessness and housing need in keeping with the numbers of housing stock they manage within each local authority area? Is it demonstrable that the association is committed to tackling homelessness and fulfilling its duty to the local authority as one of its key strategic and operational priorities?	The association can demonstrate active participation in, or instigation of, a number of initiatives designed to prevent homelessness. Examples may be Tenancy Deposit Schemes; furniture projects; forums for the allocation of Discretionary Housing Benefit payments. A senior manager in the Association has been designated "homelessness champion" within the organization, and can demonstrate that they have • played an active role in raising the profile of the local authority's homelessness strategy within the organization • contributed to raising the profile of the association with other local stakeholders as an active participant in the homelessness strategy. At every level of the Association, participation in the local authority's Homelessness Strategy is acknowledged as a priority and publicized. This should include tenants' newsletters, staff bulletins, reports to board members, and the association's annual report. There is evidence that this priority	The association can demonstrate participation in at least one initiative designed to prevent homelessness. Examples may be Tenancy Deposit Schemes; furniture projects; forums for the allocation of Discretionary Housing Benefit payments. The Association has appointed a designated "homelessness champion", but there is little evidence of active engagement or leadership within the local homelessness strategy. Participation in the local authority's Homelessness Strategy is acknowledged in some reports and papers, however there is no evidence that it is widely understood and engaged with by staff and tenants.

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	is widely understood and engaged with by staff and tenants.	
Lettings to statutorily homeless households Is the association making a fair number of its lettings available to statutorily homeless households, to assist the local authority in meeting its statutory duty to this group?	The % of true voids allocated to statutorily homeless households is monitored throughout the year, with a view to achieving the target set by the Regional Housing Board. Regular liaison takes place with the local authority throughout the year to ensure that nominations made will enable this target to be met whilst at the same time remaining sensitive to any local lettings policies in place.	Lettings are made to statutorily homeless households at a percentage of true voids in accordance with the target set by the Regional Housing Board, but there is no strategic planning or monitoring to ensure that even progress is made. Liaison with the local authority regarding nominations of statutorily homeless households is ad-hoc, tending to occur only when there a specific nomination is disputed.
Preventative approach to arrears management Has the association adopted a preventative and supportive approach to dealing with rent arrears, with eviction very much the	The association has policies and procedures in place regarding rent arrears management which are in full compliance with the Rent Arrears Pre-action Protocol and with the guidance in Housing Corporation Circular 0704. The association does not use Ground 8 for possession cases. The culture of the organization clearly	Policies and procedures regarding rent arrears management do not fully comply with the Rent Arrears Pre-action Protocol and with the guidance in Housing Corporation Circular 0704. There is evidence that the organizational culture is still focused on pursing possession action for rent arrears in a

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last resort?	demonstrates that possession action and eviction is seen as a last resort.	punitive way eg individual officers have targets set for numbers of notices served.
	The association has good links with local advisory agencies such as CAB and Shelter and makes regular referrals.	Contact with CAB, Shelter or other advice agencies tends to be reactive, with such agencies viewed as hostile to the purposes of the association.
	The association has a service level agreement with the local Housing Benefit department, which includes a protocol on disclosure of information.	Some links exist with the local Housing Benefit department, however there is no formal Service Level Agreement of protocol on disclosure of information.
	The association has good access to advice on welfare benefits entitlement and take-up, whether provided in-house or through another agency, and promotes this service through all available channels.	Welfare Benefits advice may be available either in house or through an external agency. However there is no systematic system of referral, or monitoring of results.
	The association makes a preventative and supportive approach to rent arrears a central part of its communications with tenants.	Most of the communications with tenants about rent arrears focuses on the threat of possession action in the event of arrears.
	In situations where eviction becomes a possibility, there is evidence that liaison has occurred with the local authority (homeless persons unit and social services as appropriate) to ensure that	Communication with the local authority in cases of threatened eviction extends only to sending a letter notifying of the date of eviction.

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	there is no preventative action that can be taken before proceeding.	
Provision of housing-related support Can the association demonstrate a good level of cooperation with the local authorities and other local statutory and voluntary agencies to ensure that support needs of tenants and prospective tenants are identified and provided for? Is the association able to demonstrate a constructive approach to housing individuals and families with support needs, with the emphasis on identifying and meeting support needs	The association provides, or contributes towards funding of, a floating support service for tenants whose prospects of tenancy sustainment will be improved by the provision of such support. The service is widely and systematically used. Regular meetings and liaison is held with the local Social Services department, and relevant voluntary and community agencies, to identify support needs in tenants and prospective tenants, and to establish and agree a plan for the provision of this support. Evidence of this taking place is clearly demonstrated in recent lettings. Information-sharing protocols have been set up with social services and other relevant agencies such as the probation service, and adherence to this protocol can be demonstrated in recent lettings.	Some referrals to floating support available locally have been made, but the association is not an instigator or contributor to the service, and knowledge about the service is not universal amongst staff. Cooperation and information sharing between the association and other agencies tends to be patchy. Most contact with other agencies is reactive, generated only when a problem arises or complaints are being received about a particular tenant's behaviour. There is evidence of some information sharing with other agencies, but this tends to be on an ad-hoc basis and cases can be seen where the lack of a protocol has resulted in unfair treatment eg of ex-offenders asked to disclose spent convictions.

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rather than exclusion or eviction?	The association can demonstrate that, in cases where they have become aware that an existing tenant's support needs may be increasing, or that a new need for support has arisen, the action taken has been to look for ways in which that support may be provided, using the above tools. Possession action, or the use of any punitive measures under the antisocial behaviour umbrella, are considered only in parallel with the provision of support.	There is evidence that the dominant response to allegations of antisocial behaviour is to pursue punitive measures against the behaviour, rather than looking for evidence of a new or increased support need and liaising with other agencies in providing that support. Analysis of the previous year's evictions show cases where eviction was carried out on the basis of antisocial behaviour, without adequate evidence of attempts to arrange or provide support.
Value for money • How well does the organisation maximise the impact from its resources? • How effectively has the organisation established partnerships geared to achieve value for money and improving its performance to service users and	• Collects accurate information on costs and services and uses it to decide priorities and to strategically manage resources in the context of a formal procurement strategy. • Provides service users and stakeholders with comprehensive and accurate information on services, including costs and benefits, when presenting options for improvement. • Is able to demonstrate significant cost savings and/or quality improvements through partnerships. • Provides clear and well understood	• Does not collect accurate or sufficient information about its services, or use it to effectively review cost effectiveness or performance in the context of a formal procurement strategy. • Does not systematically inform service users and stakeholders about costs, benefits and performance for services, or does not inform them in an appropriate, easily understandable manner. • May have isolated examples in place, but otherwise shows limited understanding of the value and purpose of partnership service delivery.

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stakeholders?	information on costs and how these relate to the quality of services delivered.	

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