

***LOCAL AUTHORITY
PROGRESS AND PRACTICE***

*Local authorities and the Homelessness
Act 2002 six months on*

Research findings, February 2003

Acknowledgements

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Summary

In requiring local housing authorities to conduct homelessness reviews and strategies, the Homelessness Act 2002 provides a new focus on the causes of homelessness and how they can be prevented. The homelessness provisions of the Act, which came into effect on 31 July 2002, also make changes to the way local authorities provide services to homeless people and extend the range of homeless applicants afforded statutory protection. Changes to allocations practices, including measures to facilitate more choice for applicants applying for housing came into effect on 31 January 2003.

This is the second of three reports of a research project conducted by Shelter, which seeks to evaluate the progress and practice of a sample group of 28 local housing authorities during the first year of the new legislation. A total of 26 of these authorities participated in the research for this second report, which was conducted during February 2003. The research findings are summarised below.

- All of the 26 authorities had made *'some'* or *'considerable'* progress with their homelessness review and three felt they had already made *'sufficient progress to meet the statutory requirements'*. All but one authority planned to complete this stage by the end of May 2003. However, there were differing views on what constituted a complete review.
- Whilst ten authorities felt they had collected sufficient information to conduct a thorough review, over half felt that they still had much work to do. Ten authorities specified problems with data collection as their main difficulty in conducting the review.
- One third of the 26 authorities had no plans to assess the impact of their own or local registered social landlords' (RSL) rent arrears management or exclusion practices on homelessness. One quarter had no plans to assess the local impact of housing benefit administration, though the remainder did.
- The first survey, conducted in August 2002, highlighted problems working with social services as 21 of the 28 participating authorities said their joint working arrangements needed improvement. Since the first survey, little, if any improvement had occurred. Seven authorities said that engaging with social services was their main difficulty in conducting the review. In more than half the authorities, specific practices facilitating joint working on Children Act cases had not been revised.
- Less than half the authorities receiving applications from former asylum seekers made homeless following loss of accommodation provided by the National Asylum Support Service (NASS) had been provided with information from that agency to allow them to plan for the provision of accommodation or support.
- Half of the authorities noted an increase in homeless applications from 16 and 17 year olds since July 2002, though in most cases the increase in numbers was small. Less than a quarter of the authorities had recorded any applications from people who may have been covered by the extended definitions of *'vulnerability'*.
- There were considerable variations in the systems set up to ensure that applicants' housing needs are assessed before advice and assistance is provided, with eight of the 26 authorities having no system in place at all.
- Ten of the 26 authorities had no system at all for monitoring the quality of advice provided and a further four had no internal system for checking quality.
- Whilst over one third of authorities were in the process of introducing choice-based lettings schemes, six authorities were making no changes to their allocations schemes at all. A third of authorities operating *'one offer'* policies to homeless households had no plans to change this, to offer these applicants more choice.

Recommendations

From this phase of the research Shelter is pleased to note that authorities are making progress with their homelessness reviews and that most are optimistic about completing their strategy by 31 July 2003. However, lack of staff time and capacity have caused difficulties in many areas. Authorities have also had difficulties in gathering adequate data as this is often recorded inconsistently or is not available.

Shelter is concerned that many authorities will not have assessed the impact of their own, or their partner RSLs' practices that may cause homelessness amongst existing tenants. This includes rent arrears recovery practices, exclusions policies and the administration of housing benefit.

Shelter is also concerned that closer working between local housing authorities and social services, which is required by the Act, has still not been achieved in most areas. Many authorities note a lack of commitment at a senior level, which is making it difficult to work strategically.

The lack of systems set up to monitor the quality of advice provided by local authorities is a matter of concern, as over half of those interviewed had no internal systems for assessing their services. This should be given immediate attention.

Whilst there is considerable variation in the range and detail of lettings schemes being established, a number of authorities had not made any changes to their schemes since January 2003. It is clear that in many areas the government's policy aim of encouraging mobility between areas will not be met, as the majority of authorities do not feel they are in a position to afford priority to people without an existing local connection.

Shelter would make the following recommendations from the research:

- The Advisory Panel on Beacon Councils acknowledged the importance of establishing a clear and comprehensive picture of the causes of local homelessness¹. Local authorities and their stakeholders should recognise that the homelessness review process is an on-going one. Information gathering, consultation and service planning not completed by the initial July 2003 deadline should be provided for in the strategy for subsequent years. Shelter will promote good practice examples of successful information gathering.
- Improving the working relationship between Local Housing Authorities and Social Services Authorities should be a local as well as a national policy priority for government. Poor communication, insufficient resources and lack of vision for what could be achieved means that many vulnerable people do not receive the assistance they need to avoid or overcome homelessness. Shelter will promote the good practice that does exist in some areas but there must be a commitment to adopt and build on this by others.
- It is essential that homelessness reviews assess the impact of social landlords' arrears and housing management practices, and housing benefit administration, on local homelessness. Homelessness strategies should include measures such as arrears resolution services² to actively prevent homelessness from social housing.
- Homelessness strategies should include specific action to be taken by the National Asylum Support Service (NASS) to prevent homelessness in areas where this is a relevant matter. The launch of regional NASS services from April 2003 provides a timely opportunity for NASS to take a proactive role in supporting local authorities in their Homelessness Act duties. Examples of good practice being developed between NASS and some individual authorities should be collated and disseminated.

¹ ODPM (2003) *The Advisory Panel on Beacon Councils for Round 4*, London: ODPM, <http://www.local-region.odpm.gov.uk/beacon/rd4themes>
² Shelter (2003) *House Keeping: Preventing homelessness through tackling rent arrears in social housing*, London: Shelter

- Half of the 26 local authorities in this survey accepted they have no internal quality assurance systems in place. This must be addressed as a priority. However, the Audit Commission³ has also highlighted widespread problems in assessing the quality of advice where record keeping is poor. Systems for improving quality must start from the basic position of ensuring the thorough recording of all forms of housing advice, including initial enquiries and advice given by telephone. This is a requirement of the Community Legal Services' Quality Mark⁴, which has now been obtained by a number of authorities. Shelter will publish further work on housing aid and advice later this year.
- Local authorities must implement systems to ensure all the needs of all applicants are assessed before advice and assistance is given, as this is now a statutory requirement. A common theme amongst those authorities awarded Beacon Council status for tackling homelessness was the existence of housing advice services that offered appropriate housing options to all homeless people. Shelter will collect and disseminate examples of effective good practice in conducting needs assessments and the provision of advice and assistance.
- Local authorities must ensure that homeless applicants have equity with other households as part of initiatives intended to promote choice in lettings, if balanced and sustainable communities are to be achieved. This point was also acknowledged in the decisions made by the Advisory Panel on Beacon Councils⁵.

³ Audit Commission (2003) *Homelessness: Responding to the new agenda*, London: Audit Commission

⁴ Community Legal Service (2000) *The Quality Mark Standard, Section F: Meeting Clients' Needs*, London: CLS

⁵ ODPM (2003) *The Advisory Panel on Beacon Councils for Round 4*, London: ODPM, <http://www.local-region.odpm.gov.uk/beacon/rd4themes>

1. Introduction

1.1 The Homelessness Act 2002

The Homelessness Act 2002 will make a significant impact on how local authorities are expected to manage their homelessness provision. The main changes are:

- New duties on local authorities to carry out reviews and publish strategies to tackle and prevent homelessness.
- A new duty to provide long term accommodation for unintentionally homeless people in priority need and other reforms to strengthen the homelessness safety net.
- The extension of priority need for housing to new groups of vulnerable homeless people.
- Reforms to the framework for allocating social housing.

The homelessness provisions and priority need regulations of the Act came into force on 31 July 2002. The provisions relating to allocations came into effect on 31 January 2003.

1.2 Shelter's Homelessness Act Implementation Project

During 2002 and 2003 Shelter has been working collaboratively with the majority of local authorities in England, to help them with a complex process of developing their reviews and producing their strategies. We have committed considerable resources to achieving this aim and have produced and made available a range of materials, information and training on the Act. This includes a dedicated website, www.homelessnessact.org.uk, which is updated regularly and is free to use.

1.3 Homelessness Act Implementation research

Shelter is conducting research to evaluate the implementation of the new legislation and other relevant changes in housing and homelessness practice over the 12 months from July 2002. One aspect of this is the research covered by this report.

Shelter asked 30 English local authorities to participate in a 12 month research project, evaluating and monitoring their progress and practice in implementing the Homelessness Act 2002. The project incorporates a broad geographic spread including rural, coastal and urban authorities, small district authorities and city councils. In many of the areas, Shelter's Housing Aid Centres and Projects were asked to recommend an authority that would be willing to participate in the project. Those selected include authorities that have welcomed the opportunities presented by the new Act as well as those likely to have more difficulty in implementing it because of existing local pressures or lack of resources.

The research consists of three surveys conducted with local authority staff involved in the homelessness review and strategy or other relevant operational processes. The surveys will take place over the course of twelve months from August 2002. A total of 28 authorities agreed to participate in the research and took part in the first survey, which was conducted during August and early September 2002. Of these authorities, 26 were able to participate in the second survey, which was conducted during February 2003; they are listed at Appendix 1. All of the interviews were conducted by telephone, based on a pre-designed questionnaire. Copies of the questionnaires for both surveys can be obtained from the website www.homelessnessact.org.uk. The second survey sought to establish the sample group's progress on certain issues covered in the first report and establish the extent to which changes had been planned or made to their allocations schemes since 31 January 2003. The following issues were considered:

- the authorities' assessment of their progress in conducting their homelessness review and strategy
- some detail of the content of their homelessness review so far
- the involvement of and their relationships with social services, as relevant to this process
- the involvement of elected council members and health professionals in the review and strategy process
- their ability to work with the National Asylum Support Service (NASS) to plan services for former asylum seekers, where relevant
- their assessment of the impact of the new priority need categories on homelessness applications
- details of their advice and assistance provisions
- details of changes being introduced to implement choice in lettings policies
- the extent to which new lettings practices will extend the choice of homeless households
- details of services available to help applicants in applying for housing.

The final survey is planned to take place in June and July 2003. This survey will further develop the findings from the first two surveys and consider the overall progress of the sample group of authorities at the end of the first year of the Homelessness Act 2002.

The findings of the second survey are presented in this report. Publication of the findings of the final survey will take place in Autumn 2003.

2. Report structure

Shelter aims to use this research to cover a full range of homelessness activities and developments being undertaken by local authorities. Much of this report focuses on homelessness reviews and strategies and compares progress made on these since the first survey was conducted in August 2002. The report also covers other significant changes to homelessness provisions, allocations systems and operational issues. The report is broken into the following sections.

- Section 3 – a profile of the local authorities in the sample group that participated in this phase of the research.
- Section 4 – details of the authorities' progress with homelessness reviews and strategies, including their ability to gather adequate information, difficulties they have faced, and some of the issues covered by their review.
- Section 5 – an assessment of the authorities' joint working arrangements with social services, detailing the extent of their involvement with the review and strategy process to date and any changes made to working practices.
- Section 6 – the extent to which elected council members and health care professionals have engaged with the review and strategy process. The section also looks at the authorities' ability to work with the National Asylum Support Service (NASS) to plan services for former asylum seekers, where necessary.
- Section 7 – details of the number of authorities experiencing an increase in homelessness applications following the changes to the priority need categories and factors they have identified for any increase locally. This section also considers any systems used by the authorities to ensure that assessments of applicants' needs are conducted before advice is given; systems to monitor the quality of the advice and assistance provided and to improve these as necessary.
- Section 8 – details of changes planned for or made to allocations practices to increase choice in lettings and the extent to which these apply to all applicants, including homeless households. The section also provides details of the types of assistance available to people who may find it difficult to apply for accommodation.

3. Local authority profiles

3.1 Sample group for second survey

The research project involves a sample group of 28 local authorities, 26 of which completed this second survey. The sample group completing this survey includes:

- a total of 11 urban authorities
- eight rural authorities
- two coastal authorities
- five authorities describing themselves as ‘other’, being a mixture of rural, urban and/or coastal areas.

Five of the participating authorities are London boroughs and four are unitary authorities with the remainder being two tier, with social services functions provided at a county level.

Stock transfer has now taken place in ten of the local authorities, seven of which are in rural areas. Transfer has been completed in one of these authorities since the first survey was conducted. Of the ten stock transfer areas:

- three authorities currently have their homelessness functions fully contracted out
- two have contracted out homelessness investigations but have retained decision-making responsibilities
- five have kept all of their homelessness functions in-house.

One of the authorities in which homelessness and housing advice functions were contracted out at the time of the first survey has subsequently taken these back in-house.

The sample group covers authorities whose numbers of decisions on homelessness applications⁶ in the year January–December 2002 vary considerably. The group includes:

- one authority making less than 100 homelessness decisions
- a total of eight* authorities making 100–499 homelessness decisions
- nine* authorities making 500–999 homelessness decisions
- six authorities making 1000–1999 homelessness decisions and
- two authorities making decisions on more than 2000 homelessness applications in the year.

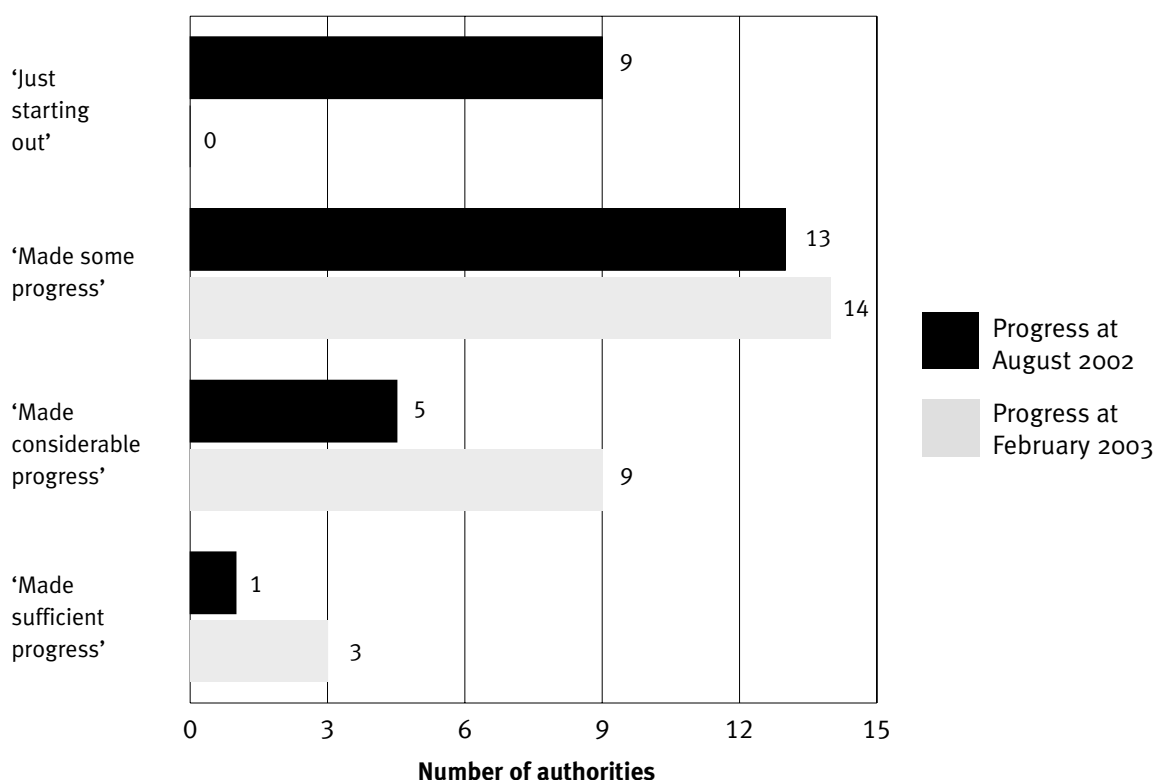
** Both of these groups include two authorities that did not have figures available for all four quarters of 2002 and for whom full year figures have been estimated.*

4. Reviews and strategies

4.1 Progress with reviews and strategies

The Homelessness Act 2002 requires authorities to conduct a review of homelessness in their district and to publish a strategy addressing this. This work must be completed by 31 July 2003 and a new strategy published every five years thereafter. Authorities were asked to assess their progress in conducting homelessness reviews to date on a scale which was left open to their own interpretation. Their replies are shown in chart 4.1.1 below and are compared to the assessment they gave when asked this question in the first survey.

Chart 4.1.1 **Authorities' current progress with the review process, compared to progress in August 2002**



Base: 28 authorities August 2002/26 authorities February 2003.

The findings are encouraging, showing that all of the authorities had made at least *'some'* or *'considerable'* progress. However, this included two authorities that had only appointed consultants to conduct the work at the beginning of 2003. Another said that the process had started in July but had been in *'abeyance'* following a problematic Best Value Review Inspection and had only just been reconvened. Two other authorities stated the work had been held up by long term staff sickness and staff changes.

Two further authorities felt that they had made *'sufficient progress'* to satisfy the statutory requirement of the Act, joining the one authority that had felt it was at this position at the time of the first survey.

Authorities were given a list of activities and asked which they felt they had completed as part of the review process. Details of their replies are shown in table 4.1.1 below. From the table it can be seen that at least half of the authorities had completed analysis of information on levels of homelessness, had identified gaps in service provision, assessed the support needs of homeless people, identified areas for future research and identified action needed with other agencies or departments. Many felt that they still had more work to do.

Table 4.1.1 **Activities completed as part of the review**

	Number of times mentioned
Analysis of information on levels of homelessness	15
Identifying any gaps in service provision	15
Assessing the support needs of homeless people	14
Identifying action needed with other agencies/departments	14
Identifying areas for future research and information	13
Consultation with service and ex-service users	12
Assessing the health care needs of homeless people	9
Identifying action needed with neighbouring authorities	9
Completing the review document	4
Conducting consultation on the review	3

Base: 26 authorities

It was clear that authorities made different assessments as to when their review process was complete. One of the three authorities that felt they had *'made sufficient progress to satisfy the statutory requirements'* did not specify completion of all of the above activities and had not yet produced a review document. Two of the four authorities that had produced a review document felt they had made only *'considerable progress'*, one of these stating that they had decided to expand their document further. Another authority had completed all the activities but was completing the review and strategy together and would be producing one document, which was expected to be ready for consultation by the end of March. They saw the review and strategy process as linked, and gave the *'end of July 2003'* as the date they aimed to complete both review and strategy, as shown in chart 4.1.2 below.

The one authority that had produced a homelessness strategy before July 2002 had completed the first year review and planned to continue to review quarterly, through the local homelessness forum.

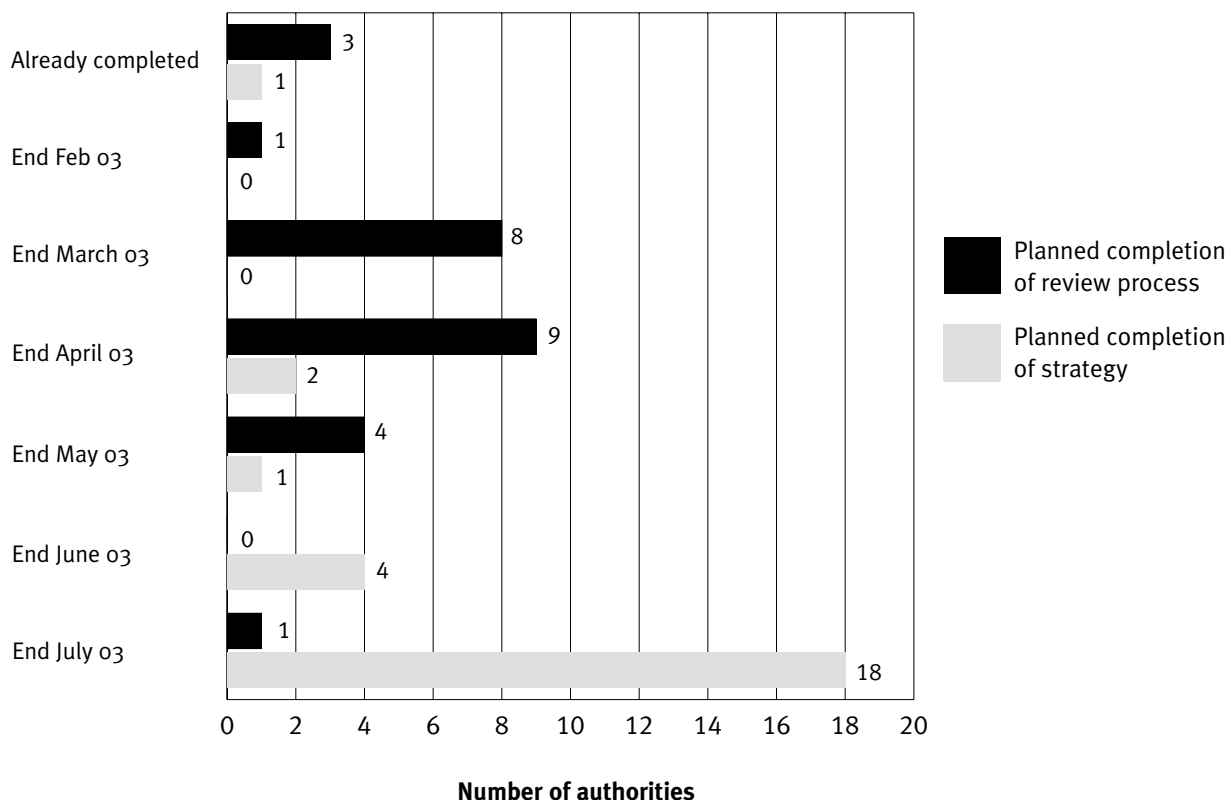
In several rural areas authorities were working with their neighbours in county-wide review and strategy groups and felt there were benefits in doing this. Examples of their working practices are shown in the box below.

Examples of work carried out by authorities working in county-wide groups

- One authority had completed some of the review as part of a county-wide group and felt this had helped with comparisons, best practice and *'getting the broad picture'* of needs and services.
- In another area, authorities in the group shared out responsibility for contacting county agencies, including social services, probation and health services, and services for older people. Different members of the group were delegated to meet with these agencies and make arrangements on behalf of the whole group. This was felt to be working very well in *'sharing good practice and information whilst alleviating workload'*.

Both authorities planned to continue to work this way after July 2003.

Chart 4.1.2 **Authorities' aims for completion of the review and strategy process.**



Base: 26 authorities

Nearly three quarters of the authorities were planning to make use of the full 12 months available to them in completing their strategy. One rural stock transfer authority said the strategy *'won't be as good as it could be, but it has to be realistic'*. The homelessness strategy will be reviewed annually as part of the authority's housing strategy, in future. Another saw this as the beginning of an ongoing process, with this year's work being *'the start of a very long road'*. This was seen as a positive challenge.

4.2 Gathering sufficient information to conduct a thorough review

The Act states that homelessness reviews must consider:

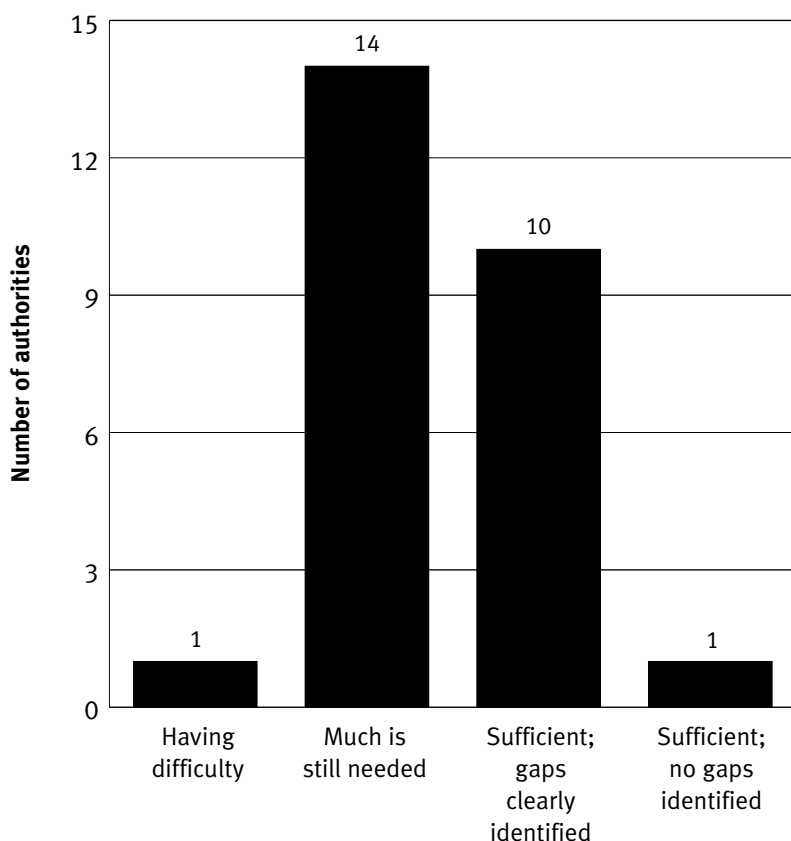
- the levels, and likely future levels, of homelessness in their district
- the activities and services provided which help to prevent homelessness, secure that accommodation is or will be available for homeless or potentially homeless people or provide support for them, including support to prevent them becoming homeless again
- the resources available to the authority and other agencies for providing these services.

The strategy must cover all people who are homeless as defined in Part VII of the Housing Act 1996 and not just those to whom the authority would have a housing duty. For example, it must consider the needs of people not in priority need for accommodation. It will obviously be necessary for the authority to obtain

and analyse considerable amounts of information to conduct this task. Not all of this information will be held by the authority or be easily available.

Authorities were asked to assess the extent to which they felt they had gathered, or would be able to gather sufficient information to conduct a thorough review in this first year. Their replies are shown in chart 4.2.1.

Chart 4.2.1 Extent to which authorities have been able to gather sufficient information for the review



Base: 26 authorities

From these results it can be seen that over half the authorities felt they had been able to gather some information, but that much work remained to be done.

One authority that felt it was having difficulty gathering sufficient information had *‘analysed information in the public domain but would have liked to do more’*. Over a third of the authorities had been able to gather sufficient information, but had clearly identified gaps to be filled in the future. One authority stated that part of its strategy would involve deciding what additional information was needed and how this would be collected in future.

Only one authority felt it had gathered sufficient information and had no knowledge gaps at all. However, one of the authorities that had completed a homelessness review prior to July 2002 noted that: *‘information gathered is only relevant at the time the review is undertaken’* and must be revised on an ongoing basis.

4.3 Main difficulties conducting a thorough review

In the first survey, 27 of the 28 authorities specified what they considered would be the main difficulties for their authority in conducting the homelessness review and strategy. Lack of staff time was most commonly seen as the main problem, with lack of other resources, difficulty gathering information and the short time period to complete the work also specified. Three authorities were concerned about lack of political support for the work, as they felt councillors did not view homelessness as a problem locally.

The authorities were asked a further open question in the second survey, to establish what difficulties they had actually encountered six months on. The results are shown in table 4.3.1 below.

Table 4.3.1 **Main difficulties in conducting a thorough review**

	Number of times mentioned
Lack of staff time	9
Engagement with social services	7
Inconsistency of data collection	7
Conflicting priorities	5
Lack of capacity because of staff changes	4
Other data problems	4
Lack of corporate interest	2
Short time period to complete review and strategy	2
Involvement of agencies other than social services	2
Other difficulties	2

Base: 26 authorities

This survey found that in three areas *'lack of staff time'* had been further compounded by *'lack of capacity'*, following changes to or the absence of key staff. The same number of authorities (ten) had experienced difficulties by February 2003 because of *'lack of staff time'* or *'capacity'* as had predicted this in August 2002.

Half of these 10 authorities also specified that conflicting priorities were a main difficulty. One authority felt that 12 months was:

'not an unreasonable period of time to do the work in itself, but it coincides with the allocations review, and implementation of homelessness provisions which are all major pieces of work'.

Over one quarter of the 26 authorities found engaging with social services to be very difficult. Joint working with social services is discussed in more detail in section 5. A further two authorities experienced difficulties with the involvement of other agencies because of *'the great number of groups dealing with single homeless people'* and in *'getting agencies to recognise the importance of their involvement'*.

Four authorities had felt they would have difficulty gathering information when asked in August 2002 but a total of ten had since experienced problems. Seven of these had experienced problems because data was collected inconsistently by relevant agencies and three authorities had other difficulties which were:

- *'the extent of information to collect'*
- *'difficulty accessing information on people who do not present as homeless'*
- *'collecting accurate statistics'.*

One of the authorities stating it had problems with inconsistent data collection experienced additional problems because *'sources of data identified by the guidance don't exist in practice'.*

Three authorities in the first survey were concerned that it would be difficult to persuade councillors that homelessness was a problem in their area, but none of them mentioned this subsequently. Instead, one of them was pleased that councillors had become actively interested and had set up their own homelessness strategy group. Two different authorities specified *'lack of corporate interest'* as a difficulty this time. One of them felt there had been:

'little acknowledgement from senior management of how important homelessness is – it has always been seen as a Cinderella service and not viewed with the same urgency as Supporting People or the Housing strategy'.

The other authority felt there had been *'a lack of interest from anyone'*, within the authority in contributing to the review and strategy.

4.4 Rent arrears recovery practices and homelessness reviews

The 'More than a roof' report⁷ identifies rent arrears as a significant cause of homelessness. Evidence suggests that a significant amount of repeat homelessness is caused by rent arrears, including homelessness from temporary accommodation.⁸ Many local authorities and RSLs operate practices which exclude people with a history of rent arrears from lettings. The survey sought to establish whether the sample authorities had assessed, or planned to assess, the impact of arrears management and lettings practices as part of their homelessness review. Authorities gave the answers shown in table 4.4.1.

Table 4.4.1 **Authorities' plans for assessing the impact of arrears management and exclusions policies**

	Number of authorities answering		
	Review has assessed	Review will assess	No plans to assess
Policies excluding applicants from local RSL lettings	5	11	9
Policies excluding applicants from local authority lettings*	4	10	6
Links between local HB administration and rent arrears**	4	14	6
Links between local HB administration and supply of private rented properties to HB claimants	4	15	6
Local authority rent arrears management practices***	3	7	7
Local RSL rent arrears management practices	3	14	8

Base: 25 authorities except where specified

* Of 20 authorities, as five stock transfer authorities answered this as not applicable.

** Of 24 authorities that replied.

*** Of 17 authorities, as 8 have completed full stock transfer and the question was not applicable.

It is welcomed that two thirds of the authorities have assessed, or planned to assess, the impact of arrears management practice or exclusions policies locally, but of concern that one third do not. In one case, a strategy officer would have *'liked to have reviewed these practices but no interest had been shown'* by senior management and they were not in a position to conduct this work alone. One authority was not looking at arrears practices as part of the homelessness review, but was setting up an Anti-Poverty Group and Corporate Debt group, which would look at these issues separately. Another stated that none of the activities were conducted as part of the review, though they form part of the council's ongoing policy work generally.

One authority stated it did not plan any assessment as it had an insignificant number of cases presenting as homeless following eviction for rent arrears. However, another area was concerned as to whether it had satisfactory data to make such an assessment and planned to investigate further, as shown in the box below.

Example of more detailed information gathering on factors causing homelessness

One authority was concerned that relying on statistics from the homelessness (P1E) forms, which just give the presenting reason for homelessness, did not give an accurate picture of the causes of homelessness locally. It planned to review a sample of one month's homelessness applications to look at the reasons behind the main presenting cause, for example, whether applicants had previously experienced domestic violence or rent arrears caused by housing benefit. As a result, it expected to unearth more problems with arrears policies and housing benefit than were currently recorded.

5. Joint working with social services

In the first survey, authorities were asked whether they felt that their joint working arrangements with social services locally needed improving, to ensure they were given such assistance as they may reasonably require in carrying out the homelessness review and drawing up the strategy. Of the 27 authorities that answered, 21 said improvements were necessary and six said they were not.

The second survey sought to establish whether any improvements to joint working had been made, and the extent to which social services staff had been involved with homelessness reviews and strategies. The survey also asked specifically whether working relationships with social services had been reviewed in response to section 12 of the Homelessness Act, which involves joint working in Children Act cases.

5.1 Social services engagement with the homelessness review and strategy process

A total of 25 of the 26 authorities said that social services had been involved with the review and strategy process to some extent and 20 of these said that there had been attendance by social services at their review and strategy group. However, there was widespread concern that the delegated representative had not attended all relevant meetings. One authority stated it had:

‘real problems engaging with social services, finding the right person and getting them to attend meetings’.

It felt that there was a *‘disproportionate amount of effort in relation to returns’*. As stated in section 4.3, seven authorities cited *‘engaging with social services’* as one of the main difficulties in conducting a thorough review. One authority that in the first survey felt that their working arrangements with social services were good and did not need improving had since found their involvement to have been *‘disappointing’* as *‘they don’t seem to be giving it any commitment’*.

There was also concern about the lack of involvement at a senior level, as shown in table 5.1.1. This often made it difficult for matters to be dealt with strategically or taken forward.

Table 5.1.1 **Level at which social services staff have been involved**

	Number of times mentioned
Director	3
Manager	20
Officer	13

Base: 26 authorities

Three authorities had had no involvement from either directors or managers of social services teams. One authority sent a questionnaire for the homelessness review to a social services manager, but it was delegated to a duty officer and *‘the reply wasn’t helpful for strategic planning’*. Input in one unitary authority has been *‘very little’* even though the Director covers social services functions as well as housing.

In some cases, the person attending the strategy group represented one specific team in social services and was not able to represent the wider service:

'The problem is with social services being a split service and with trying to ensure thorough involvement'.

Individual representation caused difficulties if that person left the service. One county-wide group said that the officer designated to attend the homelessness strategy group was off sick and had since left. The housing authorities have not been able to identify a replacement and no other social services teams had been involved at all.

There are cases where joint working on the homelessness strategy is being achieved and the importance of strategic interaction is recognised, as shown in the box below.

Examples of successful joint work with social services

One authority saw it as very important to link strategically with the Drug and Alcohol Team to give *'added value'* to the work of each service. Social services managers in strategic positions worked with housing managers and represented the interests of a range of teams.

Another felt that there had been a good flow of information between the homelessness steering group and multi-agency groups that each member of the steering group represented. Supporting People had been very helpful with this.

Good working relationships existed in one unitary authority where the Executive Council Member covered health, housing and social services.

5.2 Review of joint working arrangements in Children Act cases

Section 12 of the Homelessness Act makes amendments to the existing legislation to require clear co-operation between housing and social services authorities to find solutions for families with children who are not owed a rehousing duty by the housing authority. Housing authorities are required to refer such families to social services, provided that the household gives its consent to this referral. This duty came into effect on 1 October 2002.

When asked whether these joint working arrangements with social services had been reviewed, 15 of the 26 authorities stated they had been and 11 stated they had not. In one case, the review had not happened because it was *'unclear who to contact within social services'*. In another case the authority had planned a review as a large piece of work last year but there were major staff changes in social services and *'links have not yet been reforged'*.

The 15 authorities that said that a review of joint working arrangements had been conducted were asked to give details of the activities reviewed. The replies in table 5.2.1 are from 14 authorities as the respondent in one case was unable to give further details.

Table 5.2.1 **Joint working activities reviewed**

	Number of times mentioned
A review of working arrangements and referrals	13
Clarification of respective roles of each department	12
Instigation of formal referral mechanisms	11
Revision of procedure for seeking applicant's consent for referral	11

Base: 14 authorities that had reviewed joint working activities

Of those completing a review of working arrangements, one authority felt that this had *'been one-sided so far'*. The housing authority had identified improvements needed and hopes that they can be progressed despite little involvement from social services. Another authority had reviewed arrangements but felt that they had not really been implemented as social services *'seem keen to keep to the status quo'*.

There were a number of positive examples of improved joint working in practice. These included cases of good working with social services who *'have realised they do have a role to play'*. The authority in this case felt that the Code of Guidance had made this much clearer. Another authority had found it difficult to get strategic involvement from social services, but it did have good working relations and all the above points had been reviewed.

One authority experienced difficulties because it received many homeless applications from young people who had had previous involvement with social services in other areas. Although the authority had good working arrangements with social services in the local area, it found it difficult to make arrangements with services based elsewhere.

6. Broader participation in the strategy process

6.1 Elected council member involvement

The survey sought to establish the extent to which elected council members had engaged with the review and strategy process and the nature of their involvement. This survey found a varied level of involvement from elected members so far.

Of the 26 authorities, 18 stated that council members had been involved to some extent although in one case this consisted of the strategy officer attending a scrutiny committee meeting to alert councillors to the lack of corporate participation in the review process. In 11 cases, one or more council members had attended the homelessness strategy group. In six other authorities, council members had had no involvement so far, but would be involved at a later stage.

In both of the authorities that felt that the lack of corporate interest was a difficulty in conducting a thorough review there had been some involvement from council members, though in one case the authority stated that the scrutiny committee had been:

‘designated to conduct the strategy, but had not shown the same commitment as they had when dealing with Supporting People.’

One authority did not see lack of councillor involvement as a problem as they felt this would have *‘held up the process’*. The strategy had been delegated to the officers, and councillors would see it once it had been drafted.

In six cases where council members had some involvement, this mainly consisted of them receiving information about the progress of the review, being *‘informed not involved’*. Three authorities stated that the scrutiny committee or sub-group had received reports or assessed homelessness. In one area, council members had agreed the process for the review and strategy and made decisions on reports. As mentioned in section 4.3, council members in one authority had set up their own homelessness strategy group, engaging more fully than had been expected.

The type of council members identified as being involved in the process is set out in table 6.1.1, below.

Table 6.1.1 **Council members having involvement with the review and strategy**

	Number of times mentioned
Scrutiny members	11
Executive members	10
Leaders/group leaders	4
Other councillors	4
No councillor involvement	8

Base: 26 authorities

Variations in the level and type of councillor involvement may be influenced by the structure and political

composition of the council and existing working practices. However, in two cases where authorities had been shortlisted for beacon council status in tackling homelessness, the involvement of council members in that process had *'raised the profile and importance of the service'*. In one case, the executive member for housing had been directly involved and was now *'very committed to developments'* in homelessness services.

6.2 Involvement of Primary Care Trusts

Primary Care Trusts (PCTs) provide primary and community health care and are responsible for:

- improving the health of people living in their area
- the main local public health functions.

Although there is no statutory requirement for housing authorities to work with health services as part of the review and strategy, this is clearly an important area for joint planning and working. It is strongly encouraged as a means of *'developing more strategic approaches to talking homelessness'* in *'More than a roof'*.⁹

The survey looked at the extent to which PCTs had been involved in the review and strategy process to date. A total of 22 authorities identified the PCT as having been involved, and in 14 of these areas PCT members attended the strategy group. Four authorities had had no involvement from the PCT.

Where there had been involvement by health professionals, this often consisted of consultation, attending meetings or a stakeholders' day. The PCT had appointed a specific liaison manager for one authority. Five authorities identified what seemed to be specific or reciprocal means of involvement, which are shown in the box below.

Examples of specific involvement with the PCT

- *'...very close involvement – housing is represented on several health boards.'*
- Involvement is through a pilot project on homelessness and health.
- The PCT *'report back to the Local Strategic Partnership on Healthy Living'*.
- The PCT attend the strategy group and *'feed this back into their health work'*.
- The PCT are part of the Best Value Review Group.

6.3 Working with the National Asylum Support Service

Since April 2000 the National Asylum Support Service (NASS) has been responsible for providing accommodation and financial support for destitute people seeking asylum, though social services departments retain responsibility in certain cases. Under the Immigration and Asylum Act 1999 NASS operates a policy of dispersal to 11 areas outside London and the South East. People requiring accommodation from the service can exert no preference as to where they are sent. However, as accommodation provided by NASS should not be regarded as normal residence of choice,¹⁰ people who become homeless because of the termination of NASS accommodation can apply to any authority of their choice without being referred back under the local connection arrangements.

Whilst three of the authorities outside London that participated in this survey are in dispersal areas, others have also dealt with, or are likely to deal with, people becoming homeless in these circumstances.

People who are accommodated under the 1999 Act are at serious risk of becoming homeless once their asylum application has been determined. People lose their eligibility for accommodation 28 days after the

Home Office notifies them of its decision to grant refugee status or leave to remain. This is the maximum period of time in which alternative accommodation can be arranged. Many former asylum seekers, and particularly those who have been supported as destitute under the 1999 Act, are likely to face additional difficulties in obtaining accommodation and have greater support needs compared to other homeless people. However, tenancies or licences granted under the 1999 Act are specifically excluded from the protection from eviction legislation and the occupant can be evicted on the expiry of a minimum of seven days' notice. This often makes it difficult for local authorities to plan for the accommodation and support needs of former asylum seekers.

The survey sought to establish the role of NASS in preventing homelessness and assisting local authorities to plan services for people previously accommodated by the agency. A total of 12 authorities had dealt with applications from people made homeless following loss of NASS accommodation since July 2002, whilst 14 authorities had not. Those that had received applications were asked whether they felt able to obtain adequate information from NASS to allow them to plan accommodation and other services.

Table 6.3.1 Authorities provided with adequate information from NASS to plan services for former asylum seekers

	Number of times mentioned
Able to plan suitable accommodation	5
Able to plan other necessary support	4

Base: 12 authorities that have dealt with applications from former asylum seekers following loss of NASS accommodation.

Table 6.3.1 shows that less than half the authorities receiving applications from former asylum seekers had been provided with information from NASS, allowing them to plan the provision of accommodation. Only one third had been able to plan other support services. This echoes an internal operational review of the NASS dispersal system¹¹ that found that there was a lack of information provided by NASS to local authorities and other local agencies about the number of households being dispersed to their areas to enable them to make the relevant preparations.

Authorities were asked whether they had assessed, or planned to assess, the impact on homelessness locally of the termination of NASS accommodation for former asylum seekers. It is acknowledged that this is not a relevant issue in all areas, and not the sole cause of homelessness amongst refugees. A total of six authorities planned to carry out an assessment and three had already done so.

A number of authorities made strongly negative comments about their experiences of liaising with NASS:

- one authority had *'absolutely no faith in NASS and the Home Office'* and would not try to obtain information from them
- another found NASS to be *'secretive'* and to *'take ages to reply'* to enquiries.

An authority in a NASS dispersal area felt it did not get sufficient warning from NASS of likely numbers of people receiving refugee status or leave to remain in the UK and *'of their housing intentions'*. The authority regularly has people coming for help on the day their accommodation has been terminated: *'because [notification] letters have been sent out late or are not interpreted'*.

The authority would like to receive prior information from NASS to plan accommodation provision without people having to make homeless applications. In cases where the local authority has been responsible for accommodating an asylum seeking household, this planning can take place. The authority had set up a

¹¹ NASS (2001) *Report of the Operational Reviews of the Voucher and Dispersal Schemes of the National Asylum Support Service*, London: NASS

considerable amount of tenancy support services for former asylum seekers but cannot expand these quickly enough without prior information about demand. One authority dealt with four homeless applicants given travel warrants by NASS to leave London. NASS had not made any contact with the authority but had given the applicants cards explaining that they could go on the housing register. This authority was able to contact NASS for individual information but had no structural contact and no way of knowing whether this would be repeated, in order to plan its services.

Another authority was aware that colleagues in healthcare professions found it impossible to get information from NASS and have to *'start from scratch when dealing with new patients'*. NASS had not informed the Primary Care Trust before opening a new hostel and housing large numbers of people with particular healthcare needs in the area.

Two authorities had identified needing to obtain better information from NASS as part of their homelessness review.

Two authorities were able to give positive examples of liaison with NASS, which are shown in the box below.

Examples of productive liaison with NASS

- One authority has a corporate asylum seeker team working to pre-plan services. The lead officer had established contacts with NASS and is developing a set of guides to help former asylum seekers know what services they can get and how to access them.
- Another authority operating in a dispersal area employs a resettlement worker and has an arrangement with NASS to fax details of all households for whom positive decisions have been made on a weekly basis. The housing authority can then work with the applicants at the earliest opportunity.

As a result of the operational review of NASS, it has been recommended that the agency develop managerial structures in the regions to ensure that authorities are better informed of dispersal developments. This process was to begin in April 2003 and should offer an opportunity for improved communication with local authorities.

7. Homelessness provisions

The Homelessness (Priority Need for Accommodation) (England) Order 2002 extended the statutory definition of *'priority need'* to several new groups. These include 16 and 17 year olds, whom authorities had been strongly advised to *'normally consider'* as *'vulnerable'* by a revision to the Code of Guidance, issued in April 2000. The first survey found there was a considerable difference in the way authorities viewed the likely impact of the new priority need categories on the number of possible homeless applications. The second survey sought to establish whether authorities had, in practice, experienced any changes during July–December 2002 (six months after the Order came into effect) compared to the number of applications during the same period in 2001.

7.1 Increases in homelessness applications

Authorities were asked to specify whether there had been any recorded increase in the number of homeless applications from people in the new priority need groups. A number of authorities mentioned that any specific increase in applications from the following groups should be taken against a background of an increase in applications overall.

Table 7.1 Number of authorities experiencing an increase in applications from certain groups of homeless people

	Number of times mentioned
16 and 17 year olds ¹²	13
Vulnerable – care/fostered ¹³	5
Vulnerable – ex-offender ¹⁴	5
18 to 20 year old care leavers ¹⁵	4
Vulnerable – fleeing violence ¹⁶	4
Vulnerable – forces ¹⁷	0

Base: 26 authorities

The findings show a higher number of authorities noticing an increase in homeless 16 and 17 year olds applying, compared to the eight authorities who estimated there would be an increase in the first survey. However, in some of these cases the actual numbers involved were said to be very small or were part of an increase in applications *'across the board'*. One authority noted that the numbers of applicants in this age group are now easily identified because the authority had started recording data, which it had not previously done.

It seems surprising that no authorities had experienced any increase in applications from people who may be vulnerable having served in the forces, even though there is a local barracks in at least one area, and the Military Corrective Training facility, the military *'prison'*, is based in another. It is of course possible that such applicants may be in priority need or vulnerable for other reasons and recorded as such.

Where authorities had noticed an increase in applications, they were asked what factors they considered had contributed to this. Their replies are as follows:

- **Factors causing a general increase in applications**

Two authorities said that a better awareness on the part of interviewing officers had led to an overall increase, and two more specified changes in assessments by officers that were *'now catching those who previously slipped through the net'*. One of these authorities also specified better awareness on the part of applicants and agencies in making referrals.

¹² 16 and 17 year olds, not 'relevant' children or owed a duty under s.20 of the Children Act 1989 (s.3, The Homelessness (Priority Need for Accommodation)(England) Order 2002).

¹³ People who may be vulnerable as a result of having been in care or fostered, in the forces or having served a custodial sentence (s.5, The Homelessness (Priority Need for Accommodation)(England) Order 2002).

¹⁴ Ibid

¹⁵ Ibid

¹⁶ People who may be vulnerable as a result of ceasing to occupy accommodation by reason of violence from another person or threats of violence from another person which are likely to be carried out (s.6, The Homelessness (Priority Need for Accommodation)(England) Order 2002).

¹⁷ People who may be vulnerable as a result of having been in care or fostered, in the forces or having served a custodial sentence (s.5, The Homelessness (Priority Need for Accommodation) (England) Order 2002).

• **Factors causing an increase in applications from 16 and 17 year olds**

Four authorities felt that awareness of the change in legislation by agencies and young people was causing an increase in applications. This was also specified as a reason for an increase in the number of applications from care leavers. One authority was concerned that young people were *'misusing the legislation'*, but two others felt any actual increase from this group was small. One authority was concerned that the change in legislation had *'encouraged other agencies to drop their responsibilities and refer'*.

• **Factors causing an increase in applications from ex-offenders**

Two of the authorities noticing any increase felt that this arose from awareness of the changes by agencies such as NACRO and probation and by word of mouth. Another authority felt that any increase was attributable to an increase in applications overall.

• **Factors causing an increase in applications from people fleeing violence**

Increases in applications from people fleeing violence were largely attributed to an increase in awareness and reporting of domestic violence. Another authority had the impression that there had been an increase in applications following domestic violence but this had not shown up in their statistics.

7.2 Establishing possible vulnerability of homeless applicants

Applicants who may fall into the new 'vulnerability' categories need to provide authorities with relevant personal details if an accurate assessment of their priority need is to be made. The survey sought to establish whether frontline staff interviewing homeless applicants asked the appropriate questions to assist in establishing possible vulnerability. A total of 25 authorities were able to answer this question and replies are shown in table 7.2.1.

Table 7.2.1 **Authorities asking specific questions to determine vulnerability**

	Number of times mentioned
Has the applicant experienced violence or threats of violence?	23
Has the applicant been in care or fostered?	22
Has the applicant served a custodial sentence?	22
Has the applicant served in the forces?	21

Base: 25 authorities

In the majority of cases authorities said the specific questions were asked, or were asked where appropriate. It is acknowledged that asking applicants about criminal records or experiences of violence may not always seem appropriate, unless the applicant is advised why this information may help their case.

These findings are encouraging; with several authorities mentioning that their homelessness interview practices had been specifically amended, as shown in the box below.

Examples of changes to interview practices
<ul style="list-style-type: none"> • One authority had specifically amended the interview form and all the above questions were asked. • Another authority asked specific questions to identify all but those leaving the forces. • One authority said staff had <i>'been asking these questions for the last month, following training'</i>.

Two authorities said that applicants were asked for details of their addresses over the last five years which would be used to establish whether they had been in the forces or in custody in this time. However, this method would not necessarily establish experiences prior to this period that may be relevant.

7.3 Provision of advice and assistance

One area where the homelessness *'safety net'* has been significantly strengthened is the duty to provide advice and assistance. The Housing Act 1996 is amended by schedule 1 (9)–(12) of the Homelessness Act 2002 to require that an *'applicant's housing needs shall be assessed before advice and assistance'* is provided. Such advice and assistance must then *'include information about the likely availability in the authority's district of types of accommodation appropriate to the applicant's housing needs (including, in particular, the location and sources of such types of accommodation)'*.

In the first survey, authorities were asked whether they were satisfied that their provision of advice and assistance currently meets the new requirement to be based on an assessment of the applicant's housing need. A total of 21 of the 28 authorities felt that their advice and assistance was sufficient. The second survey sought to explore this further by establishing what systems authorities had in place to ensure an assessment of needs was conducted and to monitor the quality of advice provided.

One of the stock transfer authorities in the sample that had previously contracted out its housing advice and homelessness service had taken this back in-house in December 2002.

7.3.1 Systems to ensure needs assessments are conducted

Authorities were asked to specify systems used to ensure that an assessment of the applicant's housing needs was made before advice was given. They were asked open questions and their replies fell broadly into two categories. These were:

- systems where all applicants were seen by housing advice teams before being referred for a homeless interview, as necessary
- systems where a homeless application was taken before any advice was given.

In eleven cases, as shown in table 7.3.1.1, below, authorities mentioned either using a *'control'* or *'options'* form or having a housing *'options'* or advice service for all applicants. Five of these authorities specified that applicants were interviewed by housing *'options'* or advice officers before being referred to the homelessness section as necessary. One authority saw this process as being *'diagnostic'*. Another said it saw *'assessments as an intrinsic part of an interview'*. It had not changed its practice as it had *'always spent a lot of time on non-priority cases'*.

A total of six authorities mentioned that an assessment would be made through the homelessness interview. There was, however, some acceptance from these authorities that this was not necessarily the most robust way of delivering advice to all applicants, including those who may not be owed a statutory housing duty. It may often be more difficult for people who are not clearly in priority need, or those who are concerned about becoming homeless in the longer term and need preventative advice, to get to see a homelessness officer and thus access any advice in this way.

One authority stated that referrals for assistance were made after a homeless application, but that this process was being reviewed. Another authority reviewing its system said a recent evaluation of advice provision had flagged up the need for a separate assessment officer. It had put in a bid for funding as it wanted to ensure that applicants are provided with thorough advice at an early enough stage so they are not *'just absorbed'* into the homelessness system. The authority wanted to develop a housing options service for those not owed a statutory housing duty.

Table 7.3.1.1 **Systems for ensuring needs assessments are conducted**

	Number of times mentioned
Specific assessment form or as part of housing options/ advice service	11
As part of the homelessness interview	6
Under review	4
A questionnaire (unspecified)	1
Don't know	2
None	2

Base: 26 authorities

It is a concern that four authorities did not know whether any systems existed, or had none in place, although it is acknowledged that those interviewed are not frontline staff and may not have had this information. One of the authorities without any system did state that this was being addressed as part of their Best Value audit. However, a total of eight of the 26 authorities are currently clearly not complying with the statutory requirement to ensure that advice and assistance is based on an assessment of an applicant's housing need.

7.3.2 Systems for monitoring quality of advice

Authorities were asked whether they had systems in place for monitoring the quality of advice provided and if not, what systems they planned to introduce. Again, authorities gave open answers that have been coded as shown in table 7.3.2.1.

Table 7.3.2.1 **Systems for monitoring quality of advice provided**

	Number of times mentioned
Community Legal Services (CLS) accreditation/Quality Mark	7
Mixture of case reviews/customer surveys/monitoring complaints	3
Customer survey only	3
File review only	2
Mystery shopping only	1
No systems	10

Base: 26 authorities

It is a matter of concern that ten authorities clearly had no systems for monitoring the quality of advice given. This included three stock transfer authorities, all of which had contracted out their homelessness and advice functions to the transfer association. However, the rest of the authorities were providing advice services directly.

A further four authorities were only using external methods – customer surveys and mystery shopping – to get feed-back about their advice and had no internal systems for checking or supervising work done by their staff. This means over half the authorities had no internal systems for monitoring advice given. Many of the authorities acknowledged this was an issue to be addressed. One authority had recently been audited on its homelessness service and knew that *'performance management is not robust'*.

Even where internal systems of case or file review exist it cannot be certain that all advice is recorded and available to be monitored. The Audit Commission¹⁸ has recently highlighted problems with the lack of record keeping on advice given by many authorities. This is often particularly inadequate where advice is

given by telephone or as part of the assessment process. The Audit Commission noted that the quality of advice given in such circumstances is difficult to assess. Shelter welcomes the fact that seven authorities have the CLS Quality Mark as this requires them to have formal recording systems for advice given and proper systems for referring people to other sources of advice and help, as appropriate.

7.3.2.1 Proposals to improve monitoring of advice

The ten authorities without existing systems were asked what proposals existed for monitoring or improving the quality of advice they provided. The results are shown in table 7.3.2.1.1.

Table 7.3.2.1.1 Proposals for monitoring or improving quality of advice provided, where no current systems exist

	Number of times mentioned
Monitoring/ exit surveys	3
Commissioning audits/ mystery shopping exercises	2
Systems are under review	2
Applying for funding for a housing advice service	1
Applying for a Charter Mark	1
No proposals	1

Base: 10 authorities that did not have existing monitoring systems

Of the 16 authorities that had some existing system for monitoring advice, three authorities were considering, or applying for the CLS Quality Mark and a further three authorities were reviewing, or extending, their existing monitoring systems. These are welcome developments.

7.3.3 Activities to increase housing options

The provision of advice and assistance to homeless people who are not owed a housing duty by the authority will obviously be limited by the availability of other local housing options. This will apply even where needs assessments are conducted and the quality of advice is properly monitored. Authorities were asked whether they were undertaking or planning activities to increase the housing options available to people that are homeless but not in priority need.

Table 7.3.3 Activities undertaken or planned to increase housing options for ‘non-priority’ homeless applicants

	Number of times mentioned
Proactive work with private landlords	23
Provision of rent/ deposit guarantee schemes	21
Referral procedures/ nomination rights with housing providers	21
Protocols with social services/ voluntary organisations for the provision of information and support	15

Base: 26 authorities

The majority of authorities were involved in some work to increase access to the private sector by working with landlords, providing deposits or guarantees. In some areas these schemes were very comprehensive. Eight authorities also specified other activities had been undertaken, including those shown in the box below.

Examples of activities to increase housing options for 'non-priority' homeless people

- Employing homelessness advisers for single people.
- Producing advice and information leaflets.
- Developing a housing advice strategy for non-priority homeless people.
- Funding improvements to information recording amongst voluntary agencies to collect more consistent information.
- Establishing protocols with the Youth Offending Team, Citizens Advice Bureaux and probation.
- Funding voluntary agencies to provide a returning home scheme for young homeless people with no local connection.

8. Changes to allocations practices

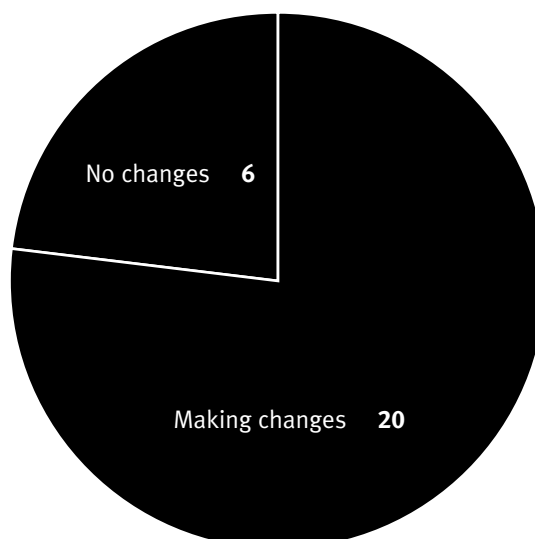
The Homelessness Act 2002 contained several changes to allocations policies, which came into effect on 31 January 2003. Several changes were designed to meet the policy aims of facilitating choice in lettings policies, including more choice based lettings (CBL) approaches. The survey investigated the extent to which authorities were making such changes and the extent to which any ‘choice’ has been extended to applicants, including homeless households.

Section 14(1) of the Act removed the requirement on authorities to maintain a housing register and section 15 replaced section 166 of the Housing Act 1996 with an entirely new section concerning applications for housing accommodation. As part of these changes, every application to a housing authority must be considered, provided it is made in accordance with the procedural requirements of the authority’s allocation scheme. This removed the concept of allocating only to certain ‘classes of qualifying persons’ and introduced new methods for establishing eligibility. These new tests have not been explored in this survey, as it was felt to be too early to establish their impact in many areas. The survey has, however, asked about the assistance available to people applying for accommodation under new schemes and the extent to which barriers to cross-border applications have been removed by the requirement to ‘consider all applications’.

8.1 Implementing choice in lettings

Authorities were asked whether they were making changes to their allocations practices to implement choice and were then asked to give details of what these changes were.

Chart 8.1.1 **Number of authorities making changes to implement choice in allocations**



Base: 26 authorities

Some authorities operating in areas of high housing demand were cautious about the amount of choice realistically available to housing applicants. One authority said its allocations policy states that the council ‘can’t extend free choice for all applicants’ because of lack of resources. Several authorities had draft schemes out for consultation and a number of others were planning, or investigating the introduction of choice based lettings (CBL) at some time in the future. Those that were introducing

changes were asked to specify what these were and the results are shown in table 8.1.1.

Table 8.1.1 Changes to letting practices to introduce choice

	Number of times mentioned
Choice based lettings – bidding systems	10
Banding systems	4
Time limited priority systems	1
More choice in current lettings policies	8
Other	2

Base: 20 authorities that were making changes to their allocations practices

Of the authorities introducing CBL, four are involved in the ODPM funded national pilot scheme and six are not. A number of CBL schemes applied to certain estates or areas, though the majority applied to all of the housing stock in the authority's district. Of the authorities not introducing CBL:

- six were introducing more choices to their current policy only
- two were adopting a banding system and more choices to their current policy
- one was introducing a banding system only
- one was providing information about the availability and turnover of stock.

Of the eight authorities introducing more choice in their current lettings practices, five of the new schemes would allow applicants greater choice over property area and type, one would remove the previous one offer policy and penalties for refusing offers and one was making both of these changes. One authority had revised its policy, but acknowledged that this had *'not gone a long way'* to introducing more choice.

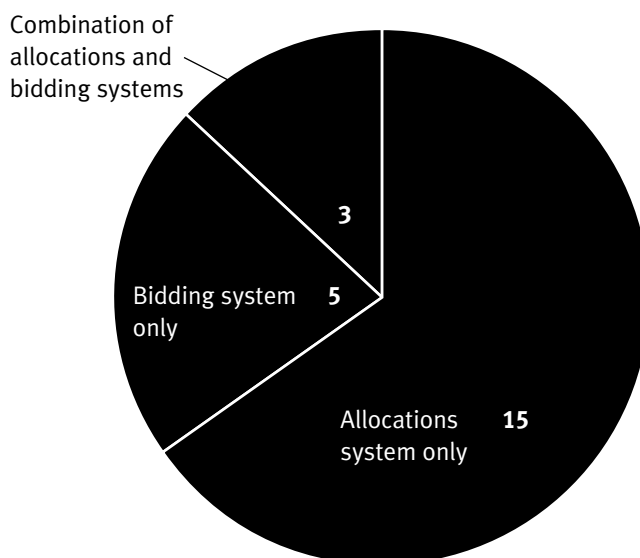
The authority providing information on stock availability was providing details of the number of specific sized properties and the rate of turn-over in all their villages and towns. It saw this as a means of helping to plan provision and providing more realistic information to applicants and other members of the community about the stock and likelihood of lettings. It had found this to be a useful exercise already and was looking for ways of presenting the information visually to be more accessible.

8.2 Details of lettings systems

All of the authorities were asked to provide details of their letting systems. Of the 25 authorities that answered, 22 planned to retain their housing register. Of the three that did not, one would operate a common waiting list held by the CBL company and one planned to keep records of people applying for the CBL scheme. The other had yet to decide on a method.

All the authorities were asked to specify the systems they would operate to give preference in lettings. The results of the 23 that replied are shown in chart 8.2.1.

Chart 8.2.1 **Systems for operating preference in lettings**



Base: 23 authorities that replied

The three authorities that were planning to introduce a combination of systems were introducing CBL in part of their district and retaining an allocation system elsewhere.

There was considerable variation in the detail of both allocations and bidding systems being operated. Details of each are shown in tables 8.2.1 and 8.2.2.

Table 8.2.1 **Methods of operation for allocations systems**

	Number of times mentioned
Points only	8
Points and date order	4
Banding and points	3
Banding and date order	2
Banding only	1

Base: 18 authorities operating an allocations system

Table 8.2.2 **Methods of operation for bidding systems**

	Number of times mentioned
Banding and date order	4
Banding, points, date order and limited priority cards for homeless applicants or urgent cases	2
Banding only	1
Points only	1

Base: 8 authorities operating banding systems

8.3 Equity for homeless households

A total of 21 authorities had previously operated a one offer policy for homeless households, although in some cases this policy applied to all applicants for housing. Of these authorities, only 14 planned amendments to give homeless households more choice in the allocation of accommodation.

- In eight cases the amendment involved access to the authority's CBL scheme. This was time limited in three of the areas, one of which would allocate a property if the applicant had not made a successful bid after four weeks.
- In three cases homeless applicants would be made more offers, in line with other applicants. One of the transfer authorities planned to *'tighten up service agreements so three offers are made to all applicants by RSLs'*.
- Two of the authorities planned to extend choice through the general amendments to their existing lettings scheme.
- One authority aimed to increase choice by offering homeless applicants placements out of area or with private landlords.

Bidding for properties available under CBL schemes depends on applicants having access to current information about available properties. Three of the authorities introducing CBL were London boroughs placing large numbers of homeless applicants in temporary accommodation *'out of borough'*. Two of these authorities specified that adverts for available properties were placed in local papers, but only one of them had set up a system to ensure that papers were mailed out to *'out of borough'* homeless applicants. The third London borough had placed computer terminals in some of its hostels to allow homeless households access, but did not specify what provision was made for those not accommodated locally.

8.4 Assistance available to people making applications for housing

The Act requires that housing authorities must ensure that:

- free advice and information is available about the right to make an application for accommodation
- assistance is provided free of charge to those who may have difficulty in making an application.

The survey sought to establish what kinds of assistance were available to help applicants generally and whether there was additional help available for those who may have more difficulty applying. This was particularly relevant for those authorities introducing substantially new systems of lettings that involved more active participation from applicants in bidding for properties. All the authorities were asked to provide details of assistance available and 25 replied; the results are shown in table 8.4.1.

Table 8.4.1 **Types of assistance available to people applying for housing**

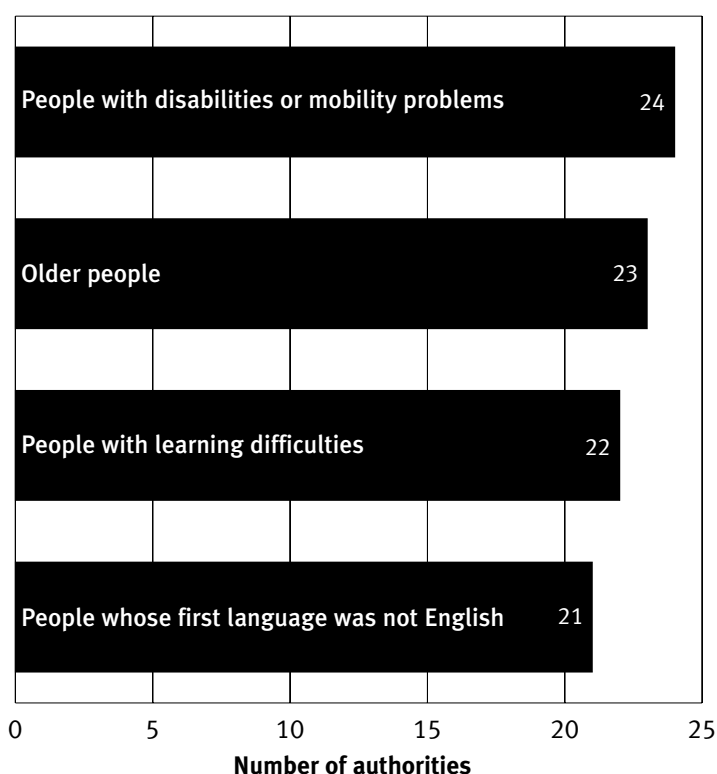
	Number of times mentioned
Face-to-face help from housing officers	25
Joint working with voluntary or community organisations	18
Joint working with statutory authorities	17

Base: 25 authorities

Several of the authorities operating CBL had *'refocused'* allocations staff to provide more proactive assistance in finding accommodation. One authority ran advice forums for specific client groups and another was looking to apply on-line policy information and applications through e-government.

Authorities were asked whether they provided additional assistance to specific groups that may need more help in applying for housing; their replies are shown in chart 8.4.1.

Chart 8.4.1 Number of authorities providing additional assistance to specific groups of housing applicants



Base: 25 authorities that replied

Examples of assistance given to specific groups

The fact that most authorities offer additional assistance to most groups is welcome. Assistance for older people and people with disabilities or mobility problems included:

- home visits
- joint work with relevant agencies such as Age Concern and local Mobility or Staying Put services
- one authority was hoping to employ an advocate to assist these groups.

Additional help for people whose first language was not English included:

- access to interpreters, translation or Language Line services, in most cases
- one authority operating CBL provides information in seven languages through its website
- two authorities specified they had access to signers for people who were deaf.

Most authorities providing services for people with learning difficulties did so by working closely with the Learning Disabilities Team in social services or by providing home visits.

Some examples of authorities that had specific scheme for people with learning difficulties or had taken specific action are shown below.

Examples of activities to assist people with learning difficulties to apply

- Ensuring that forms and literature are clear and understandable.
- Working with the Learning Disabilities Team to write their own housing strategy.
- Consulting people with learning difficulties about their needs and setting up a rehousing strategy.

8.5 'Open' registers and local connection requirements

One of the effects of the requirement on authorities to consider *'every application'* for housing is to prevent authorities from refusing to accept applications from people without a local connection. The policy intention behind this change was to promote greater mobility between areas. The survey sought to establish authorities' views on this change and to establish whether, in practice, applicants were likely to have more chance of finding accommodation in areas in which they did not already reside.

Of the 25 authorities that answered, a total of 15 authorities said they had some concerns about having to accept applications from people currently living outside their area and 10 did not. However, in five rural areas respondents specified that these were the concerns of council members who generally opposed the idea of people moving into the area from elsewhere. In most cases the officers felt these concerns to be unfounded.

The 15 authorities were asked to specify any methods they planned to use to restrict priority to people with a residential connection or strong need to move into the area. Of the 13 that replied:

- five authorities gave additional points to people with a residential, family or work connection and accepted nominations from the Home Exchange Mobility Scheme (HEMS)
- five gave additional points for a residential, family or work connection
- two gave additional points for a residential connection, but not a family or work connection, but did accept nominations from HEMS
- one authority gave additional points for a residential connection only

In areas where authorities are operating such schemes the policy intentions of the Act are not likely to be met. It was widely accepted by these authorities that it was extremely unlikely that an applicant without the relevant connections would get housed. Three authorities specified concerns about the administrative impact of processing applications from outside their area. One had already experienced an increase in the volume of forms being submitted and the number of calls staff were taking from people *'without a cat-in-hell's chance'* of being made an offer. Another authority felt that *'open registers'* will be:

'...largely illusory. People from out of the area will be able to register, causing an administrative burden, but they won't get a real chance of succeeding unless they have a need to live locally.'

Another authority was concerned about being able to gauge demand from tenants wishing to transfer in from other areas.

However, one authority in a *'high demand'* area was not concerned as *'if it is applied everywhere, it shouldn't cause a problem'*. Several areas with an excess of accommodation over demand were not concerned and had accepted applicants from out of area previously.

It seems likely, though, that in the majority of *'high demand'* areas there will be no real change in the opportunities for people without existing connections, and in many cases, for those without residential connections to have the opportunity of greater mobility whilst the supply of accommodation remains inadequate in comparison with demand.

Appendix 1

List of authorities participating in the second survey

Blackpool Borough Council
Canterbury City Council
Chester-le-Street District Council
Colchester Borough Council
Eden District Council
Ellesmere Port and Neston Borough Council
Great Yarmouth Borough Council
Herefordshire Council
Knowsley Metropolitan Borough Council
Leicester City Council
London Borough of Camden
London Borough of Hillingdon
London Borough of Lambeth
London Borough of Merton
London Borough of Tower Hamlets
Mendip District Council
Mid Sussex District Council
Milton Keynes Council
Restormel Borough Council
Ryedale District Council
Sheffield City Council
South Bedfordshire District Council
South Gloucestershire Council
Trafford Metropolitan Borough Council
Vale of White Horse District Council
West Devon Borough Council

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