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Archwilydd Cyffredinol Cymru  
Auditor General for Wales

# How Local Government manages demand – Homelessness



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SWYDDFA ARCHWILIO CYMRU



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**Mae'r ddogfen hon hefyd ar gael yn Gymraeg.**



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# Summary report

## Local authorities are reacting to the problems caused by homelessness with varying degrees of success, but there is limited focus on preventing the fundamental causes of homelessness

- 1 Given the ageing population and rising public expectations, which are putting a strain on local authorities' budgets, many local authorities across the UK are considering where they can drive greater efficiencies, improve productivity, or reduce expenditure on services by reducing levels of service or removing services entirely. Demand management can be a starting point for local authorities and public service providers as they balance delivery of services that meet the needs of citizens with fewer resources at their disposal.
- 2 In the past, increasing demand for services was often addressed by allocating more resources, widening out activities, developing new programmes or projects, improving infrastructure and increasing provision. With reduced public sector funding, public bodies need to find ways of reducing demand, and costs, whilst continuing to meet their statutory responsibilities.
- 3 This review of homelessness services assesses how well the local government is managing demand, considering the wider principle of prevention. We selected homelessness for a number of reasons. First, the Welsh Government, through the Housing (Wales) Act 2014, fundamentally changed the duties of local authorities with regard to homeless people. From April 2016 local authorities are required to provide everyone, whether homeless or not, with housing advice and assistance, and must seek to prevent homelessness from occurring where possible. A focus on prevention fits well with managing demand.



- 4 Secondly, people become and stay homeless for a whole range of complex and overlapping reasons, and solving homelessness is about much more than putting a roof over people's heads. Many homeless people face a number of issues in addition to, but often compounded by, their homelessness. For example, homelessness can be the result of:
  - a a lack of affordable accommodation;
  - b poverty and unemployment;
  - c mental health issues;
  - d alcohol, drug and gambling addictions;
  - e traumatic life events including childhood abuse, family breakdowns or instability, foster care, frequent moving, domestic violence, institutional care and parental death;
  - f convictions and imprisonment along with a lack of appropriate support following release; and
  - g discrimination by some landlords.
- 5 Thirdly, by looking at homelessness, we have been able to test how well local authorities balance delivery of services that people are entitled to, with finding solutions that are cost effective and reduce future demand. Responding to homelessness is also within the gift of each local authority and there is no prescribed or single approach in how authorities meet these needs. Our examination of homelessness services touches on wider corporate policies and approaches to managing demand for other public services and other public bodies.
- 6 Finally, data sets have been revised by the Welsh Government to take account of the new responsibilities of homelessness prevention and provide sufficient information to be able to assess if authorities and their partners are preventing homelessness.

## About this report

- 7 This review has focussed on assessing if local authorities and their partners are addressing demand through the development of appropriate and effective prevention approaches. Our study methods are set out in [Appendix 1](#). These include audit fieldwork at five local authorities; a commissioned survey of citizens about local authority services; a detailed analysis of data and expenditure on homelessness services; website and document reviews; and interviews with national organisations. Based on the findings of this audit, the Auditor General has concluded that local authorities are reacting to the problems caused by homelessness with varying degrees of success, but there is limited focus on preventing the fundamental causes of homelessness.

## Summary of our findings

- 8 The Housing (Wales) Act 2014 places homeless prevention at the centre of local authority duties, requiring authorities to focus their work on problem solving, negotiating, persuading and mediating to address homelessness. This requires authorities to both widen staff skills, and change how they organise services to mainstream prevention work and reduce demand. Better performing authorities recognise that how services are structured and delivered can encourage and create unnecessary demand, which requires new and very different ways of working to successfully prevent homelessness. However, many authorities are yet to strategically review their services to improve their effectiveness in preventing homelessness or changing citizens' behaviour.
- 9 To assist with the implementation of the 2014 Act the Welsh Government provided grant funding of approximately £11.5 million between 2015-16 to 2017-18 and plan to spend a further £6 million per year in 2018-19 and 2019-20. Whilst this funding has supported authorities to implement their new duties, the overall level of funding on homelessness and housing advice services has fallen in real terms. This is concerning as citizens we surveyed have low levels of satisfaction with homeless services, rating them as the poorest quality service that local authorities provide.

- 10 Despite low levels of service user satisfaction with homelessness services, citizens still consider their local authority to be the key agency to contact to resolve issues and address their problems. However, authorities are not always organising their services to consistently engage with users and potential users of homeless services, and opportunities to reduce homelessness demand by broadening and better targeting advice are being missed. Website information varies too widely to consistently meet people's needs.
- 11 Whilst citizens have clear expectations of how and what they want authorities to do in all areas of activity, their experience suggests that services are becoming less accessible overtime. Authorities need to make available a range of options, directly and indirectly with partners, to address homelessness. However, current approaches vary too widely and homeless people get very different solutions depending on where they seek help in Wales.
- 12 The Welsh Government recognises the importance of joint working between key partners in tackling homelessness. The Housing (Wales) Act 2014 places new duties on social services and housing associations requiring them to collaborate with local authority homelessness services to prevent and address homelessness. The impact of these new duties has been negligible in many local authority areas and partners are not always contributing to the prevention of homelessness.
- 13 Whilst national data highlights some achievements in preventing homelessness, the levels of successful prevention work is beginning to decline and the numbers threatened with homelessness and requiring temporary accommodation from local authorities are growing. Some authorities are not meeting their responsibilities under the Equality Act 2010, and are unable to demonstrate that their services are equally accessible and made available to all citizens.
- 14 The change in emphasis for local authorities in addressing homelessness has been positive, and progress is being made in a number of important areas. However, responses still focus on resolving the symptoms of homelessness and local authorities and partners are not effectively tackling the underlying causes.
- 15 Ensuring long-term sustainable prevention is difficult in key areas of activity across all of Wales because the work of public bodies in Wales is often shaped by decisions they cannot influence. Policy alignment is critical to preventing homelessness but the split in responsibilities between the UK and Welsh Government creates challenges for local authorities and partners, particularly in respect of welfare benefits.

- 16 Focusing on demand, management is hard because responsibilities rarely fall to one organisation and requires long-term commitment to deliver sustainable results. Collaboration is critical to managing demand but solutions are still too often driven by individual organisations. There is growing recognition that managing demand needs to become more central to how public bodies collectively plan and deliver services, but progress has been slow. Local authorities have generally not moved from conceptualizing what demand management could mean for them to actually improving how they manage demand in distinct services. Consequently, public bodies' current approaches to managing demand are often falling short of their responsibilities under the Wellbeing of Future Generations Act 2015.

# Recommendations

Our work has identified a series of recommendations for improvement and these are set out below.

## Recommendations

- R1 Implementing the Housing (Wales) Act 2014 requires local authorities to develop services which are focussed on preventing homelessness and reducing demand. These are very different to traditional casework led homelessness services, and prevention work requires new skills and early interaction with users and potential users. We found local authorities' progress in revising and strengthening services is variable (paragraph 1.12 – 1.20). **We recommend that local authorities:**
- **ensure their staff are sufficiently skilled to deal with the new demands of mediating, problem solving, negotiating and influencing with homeless people; and**
  - **review and reconfigure their services to engage more effectively with homeless and potentially homeless people to prevent homelessness.**
- R2 The Welsh Government provided funding to support local authorities to implement the Housing (Wales) Act 2014 and this funding has been critical in enabling new preventative services to be developed. The funding is in place until 2019-20 but authorities need to ensure they use to headspace provided by these resources to revise their services to deliver their responsibilities in the future (paragraph 1.21 – 1.28). **We recommend that local authorities review their funding of homelessness services to ensure that they can continue to provide the widest possible preventative approach needed. Reviews should consider use of Supporting People as well as General Council fund monies to support delivery of the authority's homelessness duties.**

## Recommendations

R3 How services are configured and managed at first point of contact can significantly influence how effective local authorities are in managing and reducing demand. Easy to access services which maximise usage, avoid gate keeping and focus on early solutions can significantly improve the prospects for successful homelessness prevention. We found that some authority point of entry systems are poorly designed which reduces the authority's prospects for early intervention to prevent homelessness from occurring (paragraphs 2.4 – 2.11). **We recommend that local authorities:**

- **design services to ensure there is early contact with service users;**
- **use 'triage' approaches to identify and filter individuals seeking help to determine the most appropriate response to address their needs; and**
- **test the effectiveness of first point of contact services to ensure they are fit for purpose.**

R4 Establishing clear standards of service that set out what the authority provides and is responsible for is critical to ensuring people know what they are entitled to receive and what they need to resolve themselves. We found that authorities are not always providing clear, concise and good quality information to help guide people to find the right advice quickly and efficiently (paragraphs 2.12 – 2.17). **We recommend that local authorities publish service standards that clearly set out what their responsibilities are and how they will provide services to ensure people know what they are entitled to receive and what they must do for themselves. Service standards should:**

- **be written in plain accessible language;**
- **be precise about what applicants can and cannot expect, and when they can expect resolution;**
- **clearly set out the applicant's role in the process and how they can help the process go more smoothly and quickly;**
- **be produced collaboratively with subject experts and include the involvement of people who use the service(s);**
- **effectively integrate with the single assessment process;**
- **offer viable alternatives to the authority's services; and**
- **set out the appeals and complaints processes. These should be based on fairness and equity for all involved and available to all.**

## Recommendations

R5 Local authorities need to design services to engage with service users effectively and efficiently, but current standards are too variable to ensure service users are getting access to the advice they need (paragraphs 2.18 – 2.24). **To improve current performance we recommend that local authorities make better use of their websites to help manage demand by:**

- **testing the usability and effectiveness of current website information using our lines of enquiry set out in Appendix 5;**
- **increasing and improving the range, quality and coverage of web based information; making better use of online applications; and**
- **linking more effectively to information from specialist providers' and advice specialists, such as Citizens Advice.**

R6 The Housing (Wales) Act 2014 introduces a new duty on social services and housing associations to collaborate with local authority homelessness services in preventing homelessness. We found that these arrangements are not operating effectively and service responses to prevent homelessness and assist homeless people are not always being provided, nor are they consistently effective (paragraph 3.13 – 3.25). **We recommend that local authorities set out and agree their expectations of partners identifying how they will work together to alleviate homelessness. The agreement should be reviewed regularly and all partners' performance reviewed to identify areas for improvement.**

R7 Local authorities monitoring systems and evaluation approaches to ensure compliance with their responsibility under the Equality Act 2010 and the Public Sector Equality Duty are not working as well as they should (paragraph 3.35 – 3.39). **We recommend that local authorities address weaknesses in their equalities monitoring, and ensure that their homelessness service accurately records and evaluates appropriate data to demonstrate equality of access for all service users that the local authority has a duty towards.**

## Recommendations

R8 Managing demand can be challenging for local authorities. There are some clear lessons to be learnt with regard to the implementation of the Housing (Wales) Act 2014 and homelessness prevention duties that can be applied to managing demand in other services (paragraphs 4.24 – 4.27). **We recommend that local authorities use the checklist set out in Appendix 10 to undertake a self-assessment on services, to help identify options to improve how they can help manage demand.**



## Part 1

Legislation focusses on preventing homelessness but not all authorities have effectively organised themselves to fully implement these new duties



- 1.1 Dating back to 1977, there has been a legal duty for the state to help people who are homeless or threatened with homelessness. Local authorities are responsible for this in England, Scotland and Wales, while Northern Ireland has a single organisation – the Northern Ireland Housing Executive (NIHE) – who is responsible for housing. With the devolution of housing policy to Northern Ireland, Scotland and Wales, each country has developed different approaches to tackling homelessness. In Wales, authorities have to provide everyone, whether homeless or not, with housing advice and assistance, and must seek to prevent homelessness from occurring where possible. This is very different to other parts of the United Kingdom.
- 1.2 In this section of our report we briefly outline the different approaches to addressing homelessness in the United Kingdom, highlighting the Welsh Government’s change in focus to create new duties that seek to prevent homelessness from happening in the first place. We also review how authorities are progressing in implementing these new duties, drawing out the challenges they present to the traditional focus on homelessness casework services and the very different skillset now required to prevent homelessness. We highlight how well authorities are addressing this challenge and the risks that remain. Finally we review how authorities are investing in homelessness services to support full implementation of the prevention agenda, and set out the financial risks that authorities face.

## The Housing (Wales) Act 2014 changes how local authorities address homelessness and represents a major shift in approach compared to other parts of the UK

- 1.3 The [Housing \(Homeless Persons\) Act \(1977\)](#) made local authorities responsible for the long-term rehousing of some groups of homeless people for the first time. The Act defined which groups of homeless people were considered to have a ‘priority need’, and therefore might be owed a statutory duty to be provided with settled accommodation by local authorities. Whilst the 1977 Act created a safety net that required local authorities to assist homeless people, it also made a distinction between those who should be assisted – mainly families with dependent children – and those who authorities did not have to assist.

- 1.4 In 1996, the duties in the 1977 Act were revised with the introduction of the Housing Act 1996 (for England and Wales), and the definitions of households in priority need was set out in greater detail and the circumstances in which local authorities should assist homeless persons or those threatened with homelessness. Under the 1996 Act eligibility for assistance was more tightly defined and authorities were required to assess and determine whether someone:
- a was homeless or would become homeless within 28 days;
  - b was deemed eligible for assistance;
  - c had a priority need as defined in the statutory guidance;
  - d had a local connection with the local authority area; and
  - e had become, or will become, homeless unintentionally.
- 1.5 The duty placed on local authorities was therefore to assist those households who were considered to be the most vulnerable and often the victims of circumstances beyond their control. Consequently a large number of homeless people, especially single people, had no automatic right to accommodation or help to prevent their homelessness, even if they occupied very temporary or insecure accommodation or, indeed, no accommodation and were sleeping rough.
- 1.6 The 1996 Act<sup>1</sup> broadly remained the basis for authorities' responsibilities towards homeless people in Wales up until 2014, when the Welsh Government<sup>2</sup> introduced the [Housing \(Wales\) Act 2014](#) (the '2014 Act') which changes the focus of local authority work and widens authority responsibilities to cover a much broader group of people<sup>3</sup>. Central to the new approach introduced by the 2014 Act, is a focus on better managing demand by preventing homelessness and finding more cost effective and sustainable solutions by intervening earlier to address the people's homelessness.

1 This is the system that currently operates in England and Northern Ireland.

2 Housing policy, in particular how local authorities manage homelessness, is a devolved matter within the United Kingdom with each country setting its own legislative and policy framework for administering and tackling homelessness. In recent years, there have been changes in how each country addresses homelessness and there are consequently significant differences between the four countries of the United Kingdom.

3 The new legislation was introduced on 27 April 2015 following research, development and consultation and replaced Part VII of the [Housing Act 1996](#), the [Homeless Persons \(Priority Need\) \(Wales\) Order 2001](#), the [Homelessness Act 2002](#) and the [Homelessness \(Suitability of Accommodation\) \(Wales\) Order 2006](#)

- 1.7 The legislation has changed the law on homelessness in Wales in a number of important ways and the new system, which commenced in April 2015, is very different to the legal frameworks for homelessness in the rest of the United Kingdom. The 2014 Act:
- a places a new duty on local authorities to carry out ‘reasonable steps’ to prevent or relieve homelessness for all eligible households, greatly increasing the number of people who can be helped;
  - b has created more flexibility in the range of local authority interventions, and also expanded the definition of ‘threatened with homelessness’ so that people are assisted when they are within 56 days of losing their home;
  - c requires authorities to undertake better, more targeted, prevention work with increased help, advice and information for households;
  - d has also sought to encourage a more person-centred service culture within local authorities, so that service users are closely involved in identifying and putting into action the solutions to their housing problems;
  - e has a stronger focus on the service user, requiring local authorities to help homeless and potentially homeless people to address the causes of their homelessness and make informed decisions on finding solutions to their housing problem; and
  - f places a stronger emphasis on co-operation and multi-agency working to enable a holistic response to meeting the needs of homeless and potentially homeless people, in particular enabling local authorities to make more effective use of the private rented sector as a solution to homelessness.
- 1.8 Taken together, these changes greatly increase the number of people who authorities can assist and is very different to the previous legislative system. Under the old systems local authorities had to challenge and investigate each case of homelessness and determine what assistance, if any, they had to provide. Whilst local authorities in England<sup>4</sup> and the Northern Ireland Housing Executive are encouraged to focus on preventing homelessness where possible, their duties in respect of homelessness are not framed around prevention as the primary driver. This is very different to Wales.

4 The legislation governing homelessness is, however, due to change in England with the implementation of the [Homelessness Reduction Act 2017](#). The 2017 Act sets out new duties on English local authorities with the aim of preventing homelessness and is similar in coverage to the 2014 Act in Wales. These new duties will come into force in 2018.

- 1.9 In comparison to the rest of the United Kingdom, the Scottish Government through its [Homeless \(Abolition of Priority Need Test\) \(Scotland\) Order 2012](#), removed the distinction between priority cases of homelessness and those that up until 2012 had only been entitled to temporary accommodation. In Scotland local authorities no longer operate unintentionality and priority need tests, and the 2012 Act, entitles anyone finding themselves homeless through no fault of their own, to settled accommodation. Previously, homeless people with ‘priority need’, such as families with dependent children, had the accommodation entitlement from local authorities, but that has been extended to anyone, such as single people, finding themselves ‘unintentionally homeless’. This has removed much of the investigative requirements and has resulted in Scottish authorities rehousing greater numbers of homeless people.
- 1.10 As a result of these different changes, care needs to be taken in comparing performance between countries as the systems that govern homelessness are very different. [Appendix 1](#) summarises the key differences between the countries of the United Kingdom.

### The new prevention duties require different staff skills and new ways of working but authority responses to these challenges vary

- 1.11 As noted in the preceding section, front-line responsibility for helping homeless people in Wales falls to local authorities who have a statutory duty to assist those who are homeless or threatened with homelessness. Up until the introduction of the 2014 Act this required local authority staff to make inquiries, and satisfy themselves whether a duty was owed to a homeless applicant based on their investigation of each individual’s circumstances against the five eligibility tests noted above ([paragraph 1.4](#)). This assessment could often be very complex, drawing in a wide range of information covering, for example; tenancy disputes, a person’s behaviour, family issues, relationship breakdown, an assessment of potential vulnerability, employment matters, financial standing and immigration status.

- 1.12 Given the previous investigatory focus of homelessness work, authorities needed to appoint and train staff to have a detailed knowledge of housing case law and tenancy rights. This was essential if authorities were going to both conduct and complete a thorough investigation into the individual circumstance of each homeless person and make the right initial decision, but to also defend the authority if its decision was challenged legally<sup>5</sup>. Authorities also had to ensure that they had staff with a good understanding of associated welfare and social policies such as housing benefits, immigration status, welfare payments and social care eligibility and assessment criteria; key areas that often needed to be investigated when making a decision on someone's homeless application.
- 1.13 With the introduction of the 2014 Act local authorities now need their staff to prevent homelessness through effective problem solving, negotiating, mediating and influencing people and behaviours. Upskilling staff to focus on problem solving, mediation, multi-service responses, and knowing how and where to commission the right prevention activity is a very different set of skills to traditional homelessness casework. For example, local authority staff now need to:
- a persuade and convince homeless people to make choices and often take different actions;
  - b negotiate effectively with landlords to change their decisions;
  - c work creatively to problem solve and overcome obstacles to find a solution that best resolves a situation; and
  - d influence people – parents and family members for example – to reach a mutually satisfactory agreement that may not have been their original intention.

5 Homeless applicants had the right to request a review by the authority and, subject to the outcome of this review, could also appeal to the County Court and, in certain circumstances, request a judicial review. For example, where an authority refused to house a homeless applicant while it carried out enquiries; ignored relevant factors (such as their health) when deciding whether the temporary accommodation they provided was suitable or not; or refused to review its original decision.



- 1.14 Despite local authorities anticipating that the 2014 Act would require a change in staff skills, a large number have struggled to make the effective transition from the old homelessness system to the new one. Authorities we visited noted that implementing the Housing Act 2014 created difficulties for them, particularly in respect of the amount of work required to deliver the new duties, the changing focus of activity and the personal interaction skills required by staff to work with vulnerable people to prevent homelessness. This is borne out by the findings of a recent Welsh Government survey of local authorities on the challenges of implementing the Act which found that 17 of the 22 authorities have experienced significant challenges implementing the Act<sup>6</sup>. In particular, fieldwork authorities noted to us that training and guidance provided by the Welsh Government was delivered very shortly before the commencement of the new duties, which limited the opportunities to reorganise services in sufficient time.
- 1.15 In addition to developing new skills amongst staff, local authorities recognise that they need to change their systems and processes for managing homelessness to enable them to effectively deliver the duties of the 2014 Act. In particular, the need to organise services to deliver more prevention options, reduce dependency and encourage self-reliance amongst individuals. Positively, most of our fieldwork authorities are changing how they structure and deliver homelessness services to better manage and prevent homelessness demand. The better performers recognise that how services are structured and delivered can encourage and create unnecessary demand, and to successfully prevent homelessness requires the adoption of new and very different ways of working.

6 The Welsh Government appointed Salford University to undertake a survey of local authorities on their experience in implementing the Housing Act 2014. The survey was undertaken in August 2016 and was reported in August 2017 – Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report, 8 August 2017, Welsh Government. The Welsh Government provided the Wales Audit Office with the anonymised raw data to support delivery of this study and to avoid duplication of activity.

- 1.16 For example, Carmarthenshire County Council has moved away from face-to-face office based application and assessment processes to introduce more flexible ways of working to increase the prospects of preventing homelessness from occurring. Similarly, Bridgend County Borough Council is seeking to move more information relating to housing issues online so that people can access that information without needing to meet a council official in person. The authority has also developed a Customer Service and Access Strategy which sets out actions to reduce failure demand<sup>7</sup>.
- 1.17 Too often though, the changes that authorities are making to their homelessness services are initiative-led rather than a fundamental reconfiguration of services. Consequently, many of the changes we have seen are very new and their success has not been subject to a full evaluation. They do however, show a willingness from local authorities to try new ways of working to deliver better outcomes to reduce demand and prevent homelessness. However, only four authorities noted that they had upgraded their IT systems to bring their management systems in line with the 2014 Act.
- 1.18 Despite the greater emphasis placed on authorities needing to prevent homelessness, roughly a third of authorities have a limited focus on changing behaviours amongst service users and, to an extent, staff. Some authorities continue to provide a 'paternalistic' service with homelessness services and staffing responsibilities continuing to operate with little change. These approaches can often create a culture of entitlement and dependency simply because the authority has structured services to encourage demand.
- 1.19 The impact of legislative change and the requirement to develop new staffing and service responses can be challenging. Frontline staff we interviewed during our study fieldwork noted that rigid eligibility criteria and prescriptive requirements, often set for valid and good reasons, can in practice be a barrier to managing demand. For example, one of the requirements for implementing the 2014 Act of the Welsh Government was for local authorities to use a series of notification letters that are sent out at different times during their investigations. A substantial number of local authority officers noted to us that these decisions are stretching staff resources and increasing workload. The administration time required to provide various notification letters, and personal housing plans, are time consuming to prepare and great caution has to be taken to ensure they are not open to legal challenge, although the Welsh Government has noted that these are to be provided over a 100 day or more period and they do not consider them to be too onerous.

<sup>7</sup> [vanguard-method.net](http://vanguard-method.net)



1.20 Likewise, local authorities who require homeless people to physically present at their office for assistance and staff continuing to investigate intentionality and priority need rather than seeking quicker and more timely approaches which deliver quicker solutions to prevent homelessness. Prescriptive approaches reduce discretion, limit suitable alternatives, decrease local choice, and ultimately adversely impact on public bodies' ability to improve how they manage demand for services. Recent research by Shelter Cymru found that "homelessness services are in transition. Currently this transition appears to be taking place unevenly, within authorities as well as between them. We spoke to people who felt they'd been helped effectively and people who felt they'd been brushed off with minimal help, despite having presented to the same authority at the same time."<sup>8</sup>

### **Reductions in local authority expenditure on homelessness services has been offset by Welsh Government grant funding but not all authorities are using this grant to develop sustainable approaches to tackling homelessness**

1.21 An area where local authorities have been positive about the support provided by the Welsh Government is the grant funding allocated for the implementation of the 2014 Act. To assist with the implementation of the 2014 Act the Welsh Government provided Homelessness Prevention Transitional Funding to local authorities of: £5.6 million in 2015-16; £3 million in 2016-17; and £2.8 million in 2017-18. The draft budget for 2018-19 and 2019-20 includes an additional £6 million in each year which has been added to the Revenue Support Grant to support delivery of local authority homelessness prevention duties under Part 2 of the 2014 Act. This funding has been provided to support authorities to review and reorganise their services to better position themselves to deliver their new statutory duties.

8 Reasonable steps: experiences of homelessness services under the Housing (Wales) Act 2014, Shelter Cymru, 2016.

- 1.22 Without the Welsh Government ring fenced grant, authority homelessness staff stated to us that they would not have been able to implement the Act. We found that local authorities are using the transitional funding in three main ways:
- a employing additional staff in, for example, private rented sector or housing solutions roles or to work with specific groups of homeless or potentially homeless people. However, these posts can often be fixed term or temporary for the duration of the funding and there is uncertainty if authorities will continue with these posts in the medium to long-term;
  - b developing their IT infrastructure to improve efficiency of administration and improve prevention work and casework management; and
  - c creating prevention funds for deposits, rent in advance, rent guarantees, bonds, and to cover debt and arrears.
- 1.23 In some authorities, however, the transitional funding has been used to offset reductions in core authority funding with Welsh Government monies covering the cost of posts previously funded from the General Council Fund. 14 of the 22 authorities responding to the Welsh Government's survey on implementing the 2014 Act, note that apart from the transitional funds, there had been no increase in resources available within their local authority to prevent and tackle homelessness. We found through our fieldwork that some authorities have consequently not taken the opportunity afforded by the Welsh Government's transitional monies to change their homelessness services to better deliver their new duties.
- 1.24 Our analysis of annual data returns to the Welsh Government since 2009-10, set out in [Exhibit 1](#), show that in absolute (cash) and real terms, spending on homelessness and housing advice has fallen significantly in recent years; homelessness by roughly £7 million, and housing advice by £1.4 million. In real terms, a 24.1% and 27.9% cut respectively. A detailed analysis of homelessness and housing advice expenditure by local authority is set out in [Appendix 3](#).

**Exhibit 1 – Total local authority expenditure on homelessness and housing advice services in Wales in absolute (cash) and real terms between 2009-10 to 2015-16.**

There has been a significant reduction in local authority expenditure on housing advice and homelessness services in recent years.

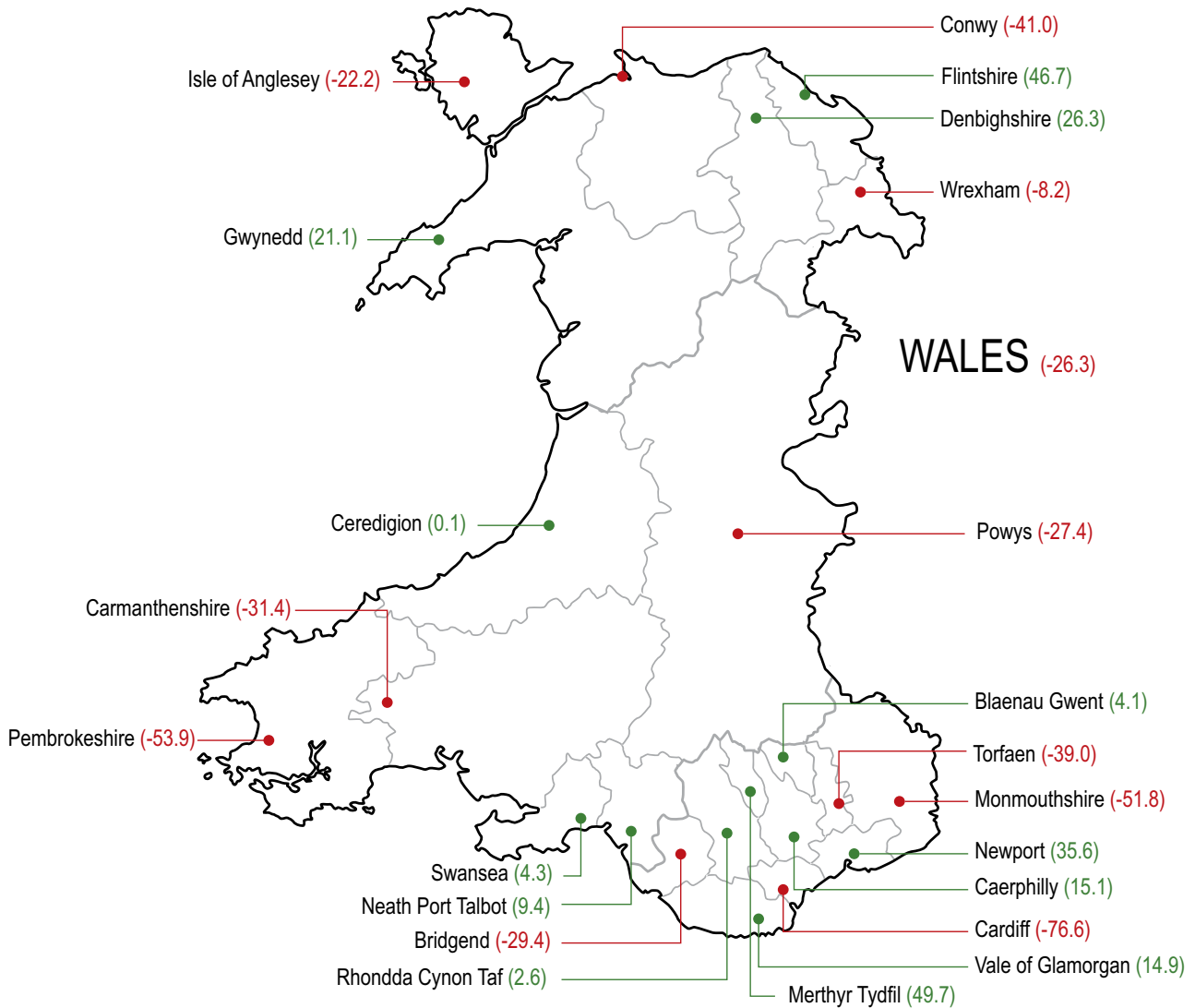
| Year    | Homelessness spend |                    |                       | Housing advice spend |                    |                       |
|---------|--------------------|--------------------|-----------------------|----------------------|--------------------|-----------------------|
|         | Absolute (£'000)   | Real terms (£'000) | Real terms (% change) | Absolute (£'000)     | Real terms (£'000) | Real terms (% change) |
| 2009-10 | £26,269            | £28,773            | -                     | £6,637               | £7,270             | -                     |
| 2010-11 | £31,333            | £33,703            | 17.1%                 | £5,101               | £5,487             | -24.5%                |
| 2011-12 | £23,734            | £25,180            | -12.5%                | £4,253               | £4,512             | -37.9%                |
| 2012-13 | £22,843            | £23,736            | -17.5%                | £4,231               | £4,396             | -39.5%                |
| 2013-14 | £20,461            | £20,916            | -27.3%                | £5,035               | £5,147             | -29.2%                |
| 2014-15 | £18,849            | £18,989            | -34.0%                | £5,246               | £5,285             | -27.3%                |
| 2015-16 | £21,822            | £21,822            | -24.1%                | £5,240               | £5,240             | -27.9%                |

Source: Revenue outturn (RO) data collection, Welsh Government. This information has been audited by the Wales Audit Office and the figures presented in the exhibit are drawn from updated returns collated from local authorities. This information is different to the unaudited data presented on StatsWales.

1.25 From our analysis of local authority expenditure, we found that roughly half of the authorities reduced expenditure between 2009-10 and 2015-16. **Exhibit 2** below, shows that the largest budget reductions between 2009-10 and 2015-16 have been in Cardiff (-73.8%), Pembrokeshire (-48.5%) and Monmouthshire (-46.2%). 11 authorities have increased expenditure in this period with the largest rises in Merthyr Tydfil (67.1%), Flintshire (63.8%) and Newport (51.3%).

**Exhibit 2 – Real terms change in expenditure on homelessness and housing advice services in Wales between 2009-10 and 2015-16 by local authority**

The graph shows the proportional change in investment made by local authorities in their homelessness and housing advice services in the last seven years. The graph highlights that overall there has been a 26.3% reduction in real terms on how much all Welsh local authorities are spending on homelessness and housing advice services. The change in expenditure ranges from budgets reducing by 76.6% in Cardiff to budgets increasing by 49.7% in Merthyr Tydfil.



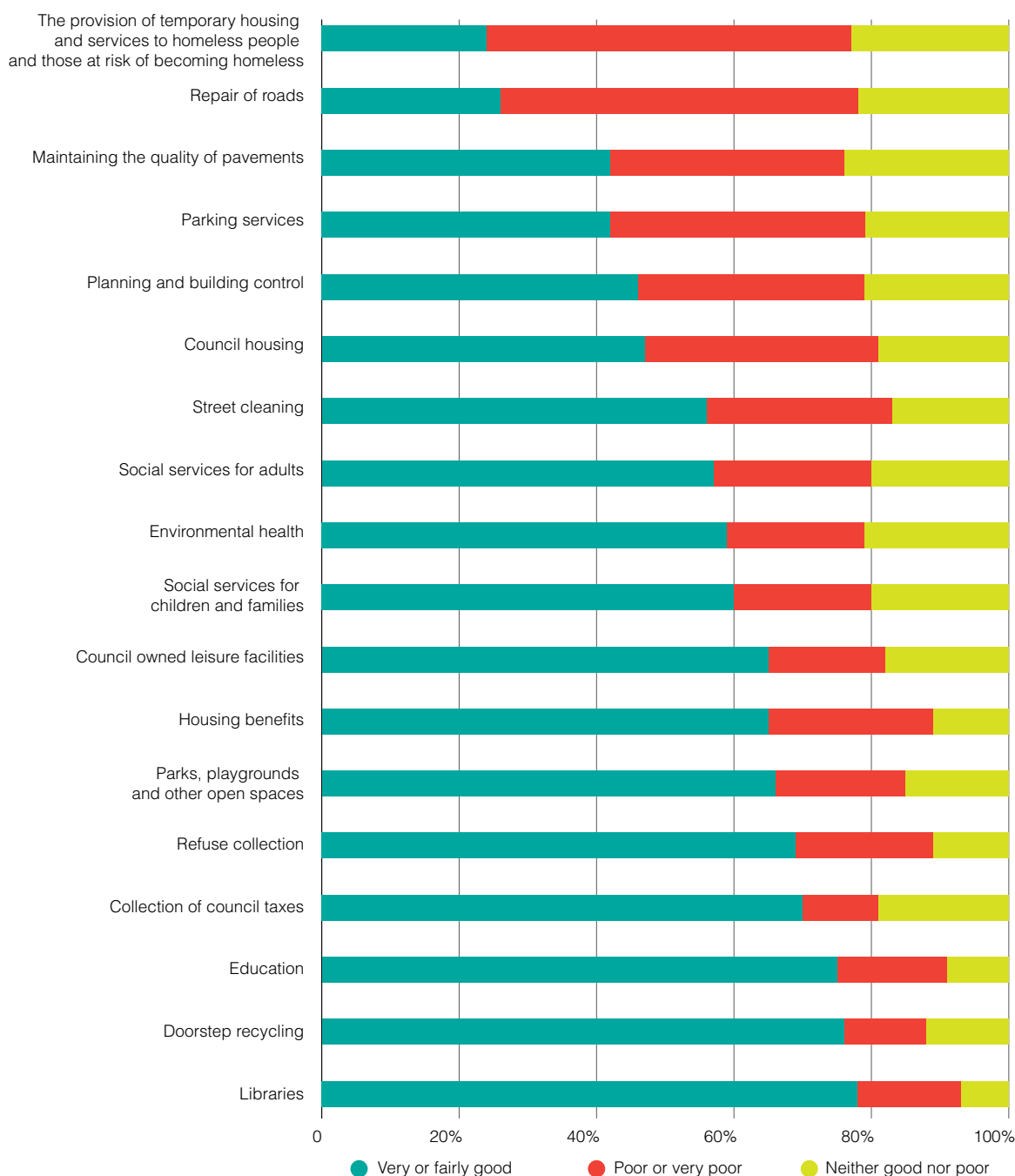
Source: revenue outturn (RO) data collection, Welsh Government. This information has been audited by the Wales Audit Office and the figures presented in the exhibit represent updated information collated from local authorities. This information is different to the unaudited data presented on StatsWales.

- 1.26 There are a number of reasons for some of these reductions in authority expenditure. For example, Cardiff Council's figures include payments from the Home Office under the National Asylum Support Service contract<sup>9</sup>, which has now ended. In Monmouthshire County Council the transfer of private sector leasing properties to a housing association has resulted in a fall in expenditure on homelessness.
- 1.27 Given the reduction in expenditure in some authorities, there is a risk that authorities will not be able to continue to provide some of the new services critical to preventing homelessness. This was flagged by roughly a third of authorities responding to the Welsh Government survey of those concerned that the loss of transitional funding in 2018-19 would present a threat to their continued implementation of the Act. The continuation of Welsh Government funding will help support authorities to deliver their new responsibilities.
- 1.28 This is particularly challenging for local authorities as the citizens we surveyed who have used homelessness services in the last 12 months generally have low levels of satisfaction with the quality of services they receive. Continued reductions in authority resources for homelessness and housing advice services are likely to result in even lower levels of satisfaction in the future. We found that citizens are most satisfied with libraries, doorstep recycling, education, collection of council taxes and refuse collection. The local authority services with the lowest levels of satisfaction are provision of temporary housing and homelessness services and repair of roads. Temporary accommodation and homelessness services comparatively, have very low levels of satisfaction and are well below the average satisfaction rate for all local authority services. **Exhibit 3** below summarises the detailed survey findings.

<sup>9</sup> The National Asylum Support Service (NASS) provided accommodation for asylum seekers whilst their application was considered by the Home Office. Cardiff Council was the regional lead for accommodation provision working with the Home Office under the NASS contract which has since ended.

### Exhibit 3 – Citizens’ views on the quality of local authority services they have used in the last 12 months

The graph summarises the views of 750 citizens on the quality of local authority services and shows that citizens we surveyed rate homelessness and temporary accommodation services as the poorest quality service provided by their local authority.



Source: Wales Audit Office, Citizen Survey, March 2017

## Part 2

Authorities are changing how they provide services and are generally effective at providing advice, but not all homeless people and potentially homeless people get the help they need



- 2.1 A key duty of authorities under the Housing (Wales Act) 2014 is the provision of effective advice and assistance. Section 60 of the 2014 Act places a duty on local authorities to provide everyone, whether homeless or not, with housing advice and assistance to help to secure accommodation. Advice and information should be based on person-centred assessment of need; be available to all people in its area, or people who have local connection; should be free; and should at least relate to preventing homelessness, securing accommodation and accessing any other help that is needed.
- 2.2 Local authorities should use a variety of media to provide advice, including face-to-face, telephone based, printed material and on-line. The timing of advice is also important, with a wide a range of information made available as early as possible. Having the right first point of contact and the right mediums to engage with service requests is also a prerequisite for authorities being able to respond to the needs of homeless people, manage expectations and influence demand for their services. Improving customer care, digitization of services, including self-help and improved online and paper based guidance are key components of demand management.
- 2.3 In this section of the report we consider how citizens find out about the services that local authorities provide, and whether services are configured to maximise usage and assistance. We review how well authorities engage with users and potential users, and whether services are provided both quickly and efficiently to homeless people to offer them timely advice to prevent homelessness. We also consider whether changes made to services are improving how homeless and potentially homeless people are accessing the help they need.

## Local authorities have not organised their services to efficiently and consistently engage with potentially homeless people

- 2.4 Appropriate, available and timely advice is essential to help homeless and potentially homeless people make the right choices to address their housing situation. Local authorities have a duty to homeless people to ensure they make available good quality information in accessible ways. The importance of good quality advice is recognised in the findings of the Welsh Government's survey of local authorities on implementing the Housing Act 2014, where 20 of the 22 authorities agree that the 2014 Act has influenced them to provide improved information and advice. To discharge their homelessness duties local authorities need to use a wide range of channels to engage with their citizens; offer good quality advice and information in a range of formats; and test that their approaches are working effectively.



- 2.5 We asked people who use local authority services how they obtain information about their local authority and the services it provides. We found that many citizens place greater reliance on indirect and non-authority sources of information than material published by authorities. For example, 44% of people rely primarily on local media as their main source of information about local authority services. Nonetheless, citizens we surveyed continue to see their authority as the first point of contact to resolve issues and the primary source of advice and information to help address their problems. For example, just over half of the citizens said that their main reason for contacting the council in the past year had been to either report a problem (27%), or to seek advice and information (24%). A higher proportion of those aged over 55 contacted their authority to report a problem, whilst younger respondents and people who are unemployed are more likely to request advice and information.
- 2.6 The 2014 Act requires authorities to now deal with people who are at risk of homelessness much earlier (56 days) than under the previous legislation, and to provide a broader range of options to resolve and prevent homelessness from happening. Configuring services to effectively engage with citizens is essential if authorities are to comply with their statutory duties and maximise their resources to better meet the demand from homeless people.
- 2.7 Citizens tend to use a range of approaches when contacting an authority to request a service, or when they need assistance. Our survey found that whilst service users most often telephone authorities, either via a customer call line/centre or directly to a specific department or person, a significant number also use e-mail (directly or via the authority website), as well as visiting an office or information centre. Authorities need to ensure that people are aware of the methods that they can use to contact the authority, and they should monitor the effectiveness of these arrangements.
- 2.8 There are a number of challenges for authorities delivering services to homeless people. On a practical level, people who are homeless, and those threatened with homelessness, often do not have the finances to visit authority offices. The quality of public information also tends to be generic and not tailored to individuals, which makes it less relevant and consequently often ineffective at guiding them on what they need to do. People who use homeless services use in person contact and third party contact with local authorities rather than web based services and social media. Authorities need to understand service users' communication preferences and to design information in ways that they can best access directly or via partner agencies.

- 2.9 Given the different approaches citizens use, authorities need to ensure they offer a broad range of options to respond effectively to their needs. Authorities also need to understand how and when people enter the 'public service system'. Good quality customer/user data and intelligence is critical to this process. Therefore systems for customer contact should be wide ranging; fully accessible; and capture the work of all relevant public sector bodies<sup>10</sup>.
- 2.10 Carmarthenshire County Council reviewed its housing options services in 2011 to determine the best way of providing housing options services to enable staff to engage more quickly and efficiently with service users in ways that reflected the preferences of homeless people. The review concluded that homeless people preferred a telephone based service to face to face office based interviews. Subsequently, the authority has introduced a telephone call handling service to act as a first point of contact triage service which provides initial advice and information to identify how best to meet client's needs. If a person's circumstances are more complex and require further intervention, then the triage team refer the individual onto specialist case officers.

**Carmarthenshire County Council – The authority's Housing Options and Advice team's approach to coping with incoming activity provides a good example of how to deal with service demand**

In 2013, the Council had limited information on customer satisfaction and addressed this with the introduction of five evaluative questions asked to each person who contacted the service. These were focussed on the quality of advice, resolution of issues and communication methods. The Council also analysed the numbers of calls being dealt with, and found that only 40% of calls were being answered at the first point of contact.

The Council installed a screen to show the demand coming in and to allow team members to better manage the demand, enabling the use of data to match callers to the best suited staff members. The new approach contributed to increasing the proportion of housing options calls dealt with at first contact to 96%.

The Council strives to resolve issues at the first point of contact wherever possible. In 'making every contact count', the core team dealing with incoming calls is made up of officers with a variety of backgrounds who can provide solutions to people's problems. This is also found to be more satisfying for team members who actually help and advise on housing options for people as a result, rather than taking and diverting calls to more suitable departments.

<sup>10</sup> Gateway reviews along intervention timelines in youth justice services are an increasingly established way of understanding how and when people enter the 'public service system'.

2.11 A number of authorities noted that a substantial percentage of contacts between the public and housing options officers is not for specific homelessness assistance, but to obtain advice on wider housing issues. For example, at the time of our fieldwork Merthyr County Borough Council operated generic Housing Solutions Officers which provide services for a wide range of issues including homelessness and other matters. The housing options service requires those threatened with, or actually homeless, to physically attend offices and to be interviewed, unless they are unable to attend the civic centre. Whilst officers recognise that this approach enables the authority to identify and focus on the needs of homeless people, their initial analysis and evaluation of casework found that only 19% of contacts were requests for homelessness services and the other 81% related to other housing issues. Poor organisation of staff and services can therefore generate additional and often unnecessary demand.

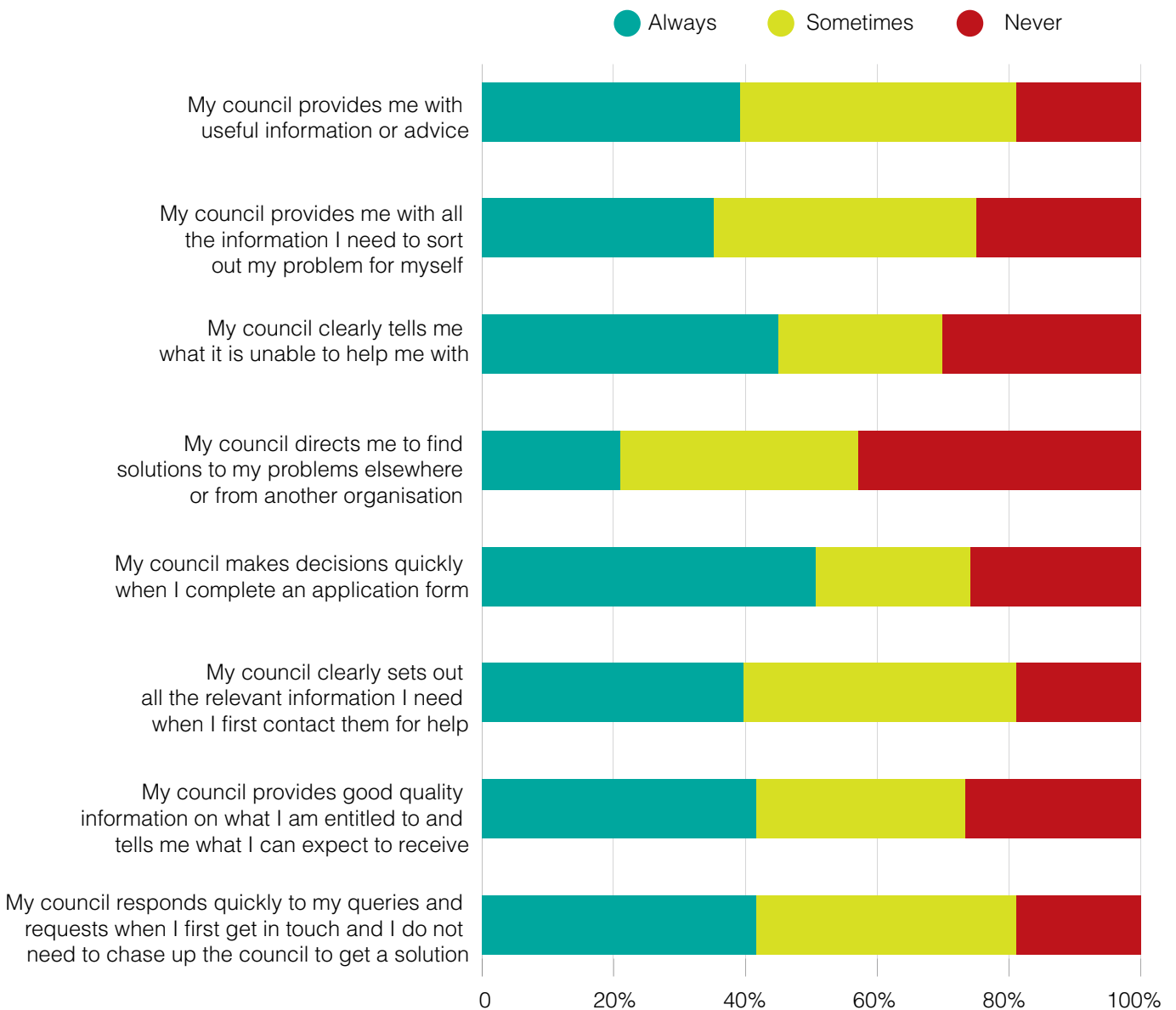
### **There are opportunities to reduce homelessness demand through the provision of effective information and advice, but authorities fall short of the standards required in key areas**

- 2.12 As well as making advice available through a range of appropriate channels, authorities also need to ensure the advice they provide meets the needs of those requiring help to avoid creating 'failure demand'<sup>11</sup>. Avoiding 'failure demand' is better for the service user and more cost effective for an authority as it cuts costs by reducing avoidable contact between the authority and its users by resolving problems as quickly and efficiently as possible. To achieve this authorities need to resolve citizens' problems at the first point of contact by providing information and advice that is relevant, timely, comprehensive and clear.
- 2.13 Poorer performing authorities are often creating additional demand by failing to do something or do something right for the service user at the initial contact. **Exhibit 4** below summarises the findings of our citizens' survey and shows that there is variable performance across Wales, and authorities are not always effective in how they engage with services users.

11 [Vanguard Method](#).

### Exhibit 4 – How well local authorities respond to requests for assistance

There is variable performance in relation to how well authorities respond to request for assistance from homeless people and other local authority service users and are consequently able to avoid failure demand



Source: Wales Audit Office, Citizen Survey, March 2017.

2.14 Engaging effectively and early with homeless people is essential if authorities are to successfully prevent homelessness. Our survey found that there is no discernible difference between the views and experiences of homeless people compared to those who use other services provided by local authorities. Citizens who have used homelessness services are generally positive that authorities respond quickly to requests for help, providing useful advice and information. Where people apply for a homelessness service the majority stated that authorities make decisions quickly. However, authorities are not always good at directing homeless people to find solutions to problems elsewhere, or from another organisation. Similarly, authorities do not always clearly set out what homeless people are entitled to and can expect to receive, which is creating uncertainty and ambiguity for them. A quarter of survey respondents also note that their authorities are also poor at telling them what they are unable to help with.

- 2.15 Reducing unnecessary demands on homelessness services is often hindered by poor or unclear service standards<sup>12</sup>. Service standards are often not published, and it is not always clear what homeless people can expect now and in the future. Some public services provide clear service standards. Whilst many authorities have some form of corporate customer care standard, for example Flintshire County Council's Customer Service Policy<sup>13</sup>, these often lack clear measures of success, and do not set out what authorities do not do and the expectations of homeless applicants and wider users of public services. Good service standards need to:
- a be written in plain accessible language that is well understood by users, including those that may be anxious or uncertain about their future;
  - b be precise about what applicants can and cannot expect, and when they can expect resolution;
  - c be clear about the applicant's role in the process and how they can help the process go more smoothly and quickly;
  - d be produced collaboratively with subject experts and includes the involvement of people who use the service(s);
  - e be linked to good gatekeeping and a single assessment process;
  - f offer viable alternative preventative services; and
  - g be based on fairness and equity for all with appeals and complaints processes clearly set out and promoted widely.
- 2.16 Better performing authorities organise homelessness services in ways which help people to resolve their problem at first interaction. Integrating customer contact centres can help manage demand by reducing the numbers of separate service requests from homeless people and signposting a fuller package of support and information. Newport City Council's Information Station, on the site of the old Newport railway station, offers services from Newport City Council and partner organisations and services such as citizen's advice, tourism, employment, community safety and the authority's homelessness services as well as an increasing range of other authority services such as housing, social services and planning.

<sup>12</sup> Service standards define the service provided by a public body. They inform customers of the services they are entitled to receive; provide a foundation for the delivery of services; allow for better measurement of an organisation's performance; and form the basis of the internal management information systems.

<sup>13</sup> [Customer Service Policy](#)

2.17 Partner organisations we interviewed such as Shelter Cymru highlighted that from their experience authorities have yet to develop comprehensive or accessible information and advice services that consistently meet the needs of homeless people. Because of the complexities of homelessness, voluntary sector partners also feel that authorities are not maximising opportunities to work collaboratively with specialist agencies to identify and address the needs of people with challenging issues – prison leavers and people with substance misuse issues for example – and advice often falls short of providing timely and effective solutions.

## Digitisation offers authorities opportunities to improve how homeless people access services and advice but current approaches vary too widely to meet their needs

2.18 Smartphones<sup>14</sup> are invaluable tools for connecting people who are isolated, and empowering homeless individuals to access important, often, life-changing services and gain self-sufficiency. Some homeless people are using social media to build support networks and solve practical issues such as where to find help and assistance. Mobile phones, and in particular smartphones, offer homeless people a valuable lifeline to opportunities. Homelessness organisations told us that some homeless people often need support to access information on local authority websites, and authorities are beginning to address how information is accessed. All organisations recognised however, that access to good quality on-line information is vital and the use of mobile telephones to access this data is growing.

### Better use of technology to help prevent homelessness

Better technology can help manage and prevent further challenges to homelessness people. New services include touch-screen kiosks, phone charging terminals, better Wi-Fi coverage and free access to the use of computer terminals<sup>15</sup>. Projects such as the Virtual Backpack – which is an electronic bundle of important personal documents – builds on the work by Westminster City Council who hosted a Homeless Hack Day to take advantage of the free Wi-Fi provided for Olympics visitors in 2012. The [Homeless Link website](#) lists information on 9,000 services such as hostels, day centres, and advice and support services and is offered by local authorities in response to the increasing numbers of rough sleepers in London. Sandwell Council in the West Midlands provides an internet based application system for young homeless people to access services, keep in contact with friends and family, and find jobs.

14 A smartphone is a mobile personal computer with a mobile operating system with useful features for mobile or handheld use. Testing the mobile experience for 'Better connected' is done from a smartphone and fully integrated into the overall assessment.

15 The potential for empowering homeless people through digital technology, Lemos and Crane 2013.



- 2.19 Authorities need to therefore ensure that online information is accurate, of a good quality and up-to date to support homeless people addressing their needs. Our review suggests that at present there is scope for authorities to improve how they organise and provide their services online to both ensure homeless people, and those threatened with homelessness, get the help they need but also enable authorities to make the best use of their resources.
- 2.20 SOCITM's Better Connected Ratings<sup>16</sup> provide an overall evaluation of a user experience of local authorities' digital platforms across all services including homelessness. SOCITM's Better Connected results for 2016-17 (Appendix 4) rated no council in Wales as having a four star (very good) user experience for their digital platforms. 11 local authorities are rated as three star and 11 as two star or below. When comparing performance with 2015-16, six local authorities improved their rating, three saw their ratings worsen and 13 local authorities' ratings stayed the same. Overall, there is scope for the Welsh local government to improve how it uses its web assets to engage with and support people.
- 2.21 16 authorities are rated by SOCITM as having passed the mobile standard<sup>17</sup> assessment, and 15 authorities the accessibility assessment<sup>18</sup>. Only one council improved its rating in the area of accessibility, with all others retaining their previous rating. Compared to 2015-16, three local authorities that passed have now failed, and three that failed have now passed. Local authorities who make no attempt to optimise their sites for mobile access are providing the service user with a poorer user experience.

16 SOCITM, the society for public sector IT practitioners undertakes annual reviews of council digital performance, websites, social media and customer portals, as well as take-up, satisfaction and management. SOCITM reviewers conduct some tests on a smartphone, given nearly half of all visits are made from mobile devices. SOCITM publishes the results of their reviews as Better Connected data.

17 The mobile standard is determined by the average satisfaction rating for each of five questions used by SOCITM to find common information from a mobile device plus overall ease of use. Generally, better performing authorities have no errors while people are browsing the authority site and the overall mobile experience is rated satisfactory or very good.

18 Websites must be as accessible as possible for all users, including people with disabilities. Badly designed and implemented websites can make it difficult or impossible for disabled people to use the internet, including those using assistive technologies, for example, text-to-speech screenreaders. SOCITM rate the accessibility of local authority website against 14 design and coding best practices.



- 2.22 We assessed the quality, accessibility and range of current information that authorities provide on their websites for their homelessness service and, for comparison, two other service areas – home to school transport, and bulky waste – to assess the current standards of service and the quality of information provided. Our review judges the effectiveness of authority websites to provide quick and easy ‘customer journeys’ and successful resolution of homeless peoples service requests against a five point scale ranging from very poor to very good to rate the information across 13 aspects. [Appendix 5](#) sets out our detailed findings and the key lines of enquiry for our assessment.
- 2.23 Authorities generally provide up-to-date information which is available in a range of formats and languages which is easy to find. The best performing authorities have developed on-line application processes, although this was more prevalent for home to school transport and bulky waste than homelessness services. However, most authorities do not provide comprehensive wide ranging advice and information that is sufficient to allow citizens to make considered choices and decisions on what they should do to resolve their problem. Information relating to homelessness was harder to find and did not always clearly signpost people to where they could get assistance to address their problems, compared with the other two services we reviewed. These weaknesses present a less than positive starting point for homeless people, and does not offer them the information they need to make informed choices to address their predicament. The poor quality of current digital services may also explain the low current take up amongst service users.
- 2.24 From our fieldwork, we have concluded that whilst authorities recognise that they need to design services to engage with homeless people effectively and efficiently, current standards of services are too variable to ensure homeless people are getting access to the advice and assistance they need. Taken together, SOCITM’s analysis and the findings of our review highlight that authorities could make better use of their websites to help manage demand. For this to work, authorities will need to consider when and where channel shift can take place and ensure they engage with homeless people and other stakeholders to maximise the potential benefits of these approaches.

## Homeless people are clear on how they want their local authority to provide services to them but their experience suggests that services are becoming less accessible

2.25 Homeless people and other local authority service users have high expectations of what authorities should do for them and how they should provide services to them. Whilst many people acknowledge local government is having to change how they provide services to reflect the resources that are available, homeless people and other people using local authority services still believe that their local authority should continue to provide a safety net when they need help. The findings of our survey bear this out and provide some clear messages for how local government provides homelessness and other services in the future – **Exhibit 5.**

### Exhibit 5 – Key issues in how local authority should provide services in the future

Homeless people and other local authority service users are clear on how they want local authorities to provide homelessness and other local authority services to them in the future.

| Thinking about the services your council needs to provide in the future, to what extent do you agree or disagree that they should focus on... | Strongly agree/ agree | Strongly disagree/ disagree | Do not know |
|---|-----------------------|-----------------------------|-------------|
| Focus on providing advice and information and directing me to others who are best placed to solve my problem                                  | 83%                   | 9%                          | 8%          |
| Focus on providing advice and information to solve people's problems  | 81%                   | 12%                         | 7%          |
| Direct people to other organisations who are best placed to solve their problems  | 81%                   | 10%                         | 9%          |
| Provide more services in the community and in people's homes  | 79%                   | 12%                         | 9%          |
| Be the first point of contact for any problem people have in their area   | 78%                   | 18%                         | 4%          |
| Share offices with other public bodies  | 69%                   | 15%                         | 17%         |
| Make more services available online   | 63%                   | 26%                         | 12%         |

| <b>Thinking about the services your council needs to provide in the future, to what extent do you agree or disagree that they should focus on...</b> | <b>Strongly agree/ agree</b> | <b>Strongly disagree/ disagree</b> | <b>Do not know</b> |
|--|------------------------------|------------------------------------|--------------------|
| Equip people to find their own solution to the problems they have  | 60%                          | 31%                                | 10%                |
| Prioritise what is provided and reduce services in other areas of activity   | 51%                          | 30%                                | 19%                |
| Reduce services provided from offices away from main town hall/county hall to local offices  | 42%                          | 40%                                | 18%                |
| Increase council tax charges to have enough money to continue to provide existing services   | 29%                          | 64%                                | 7%                 |

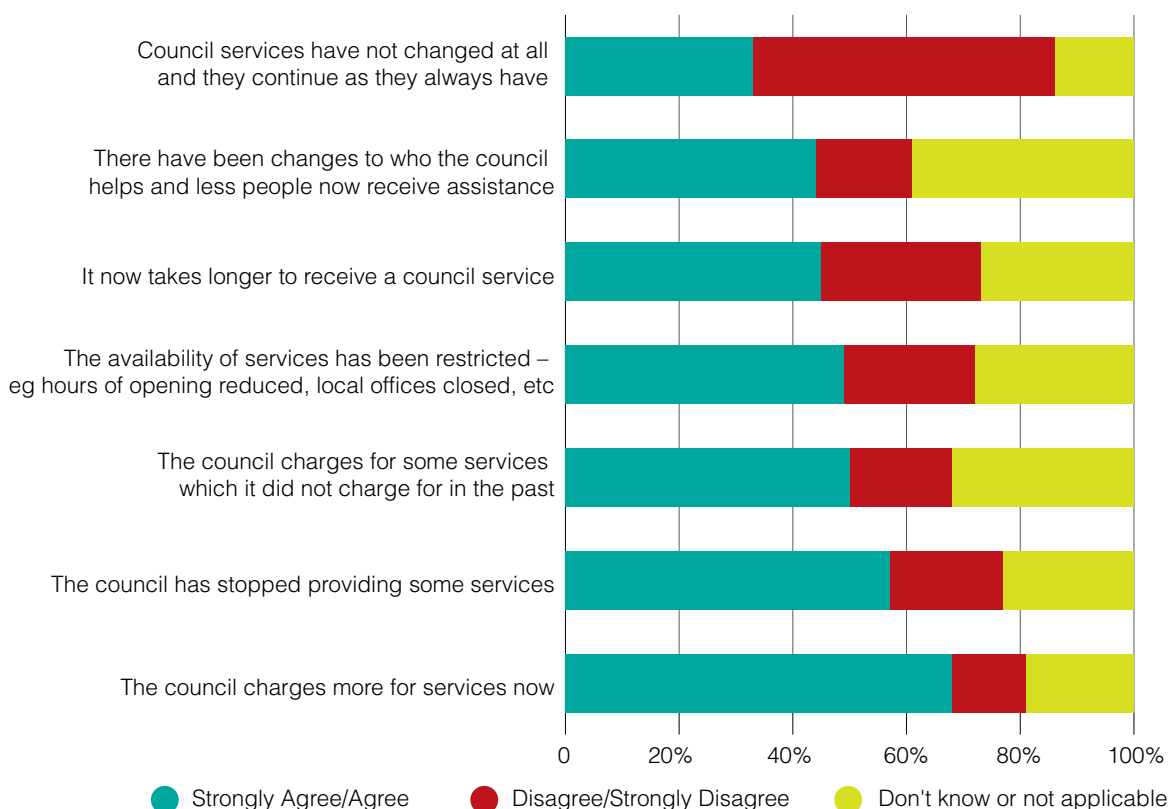
Source: Wales Audit Office, Citizen Survey, March 2017.

- 2.26 Positively, the majority of citizens continue to see the local government as their first point of contact when they require help to resolve their homelessness problems. Whilst citizens recognise that authorities need to equip them to become more self-resilient, the majority of respondent to our survey (78%) want their local authority to continue to act as a safety net to provide help and assistance if they are unable to address their homelessness or other problems themselves. People want their local authority to ensure that the advice and information they need is made available, either directly by authorities or indirectly by partners who work with the local government.
- 2.27 We also found that citizens are conscious of the need for local authorities to make the best use of their resources and support moving services online, sharing offices with partners and providing more services in the community and to people's homes. Just over half of respondents to our survey also recognise that the local government needs to prioritise where it spends its money. Whilst less than a third of people support increasing council tax charges to continue to pay for services, there is growing recognition that there may be a need to increase charges for services to ensure they continue to be made available.

2.28 We found through our fieldwork that local authority responses, following implementation of the 2014 Act, are too often focussing on their immediate challenges and authorities are not always taking a sufficiently strategic and preventative view on how best to meet need in the medium to long-term. Whilst a third of citizens who responded to our survey ([Exhibit 6](#) below) have seen no discernible change in the services they receive from local government, the majority noted that from their experience, all authority services, including homelessness, are becoming less visible, available and accessible. Such choices, which are often made for very valid financial reasons, limit the potential to engage with service users quickly to prevent homelessness from occurring.

**Exhibit 6 – Thinking about the services your council provides, in your experience, to what extent do you agree or disagree that...**

Changes made to homelessness and other local government services affect how homeless people and others access and use authority services.



Source: Wales Audit Office, Citizen Survey, March 2017.

2.29 Too few local authorities are engaging users of homelessness services in their plans for the future, and therefore the authority's expectations of what is possible may be set unrealistically high. Consultation tends to be piecemeal and a 'one-off' set piece rather than a well-integrated, considered conversation with residents, partners and opinion formers. Some local authorities do analyse findings and set out what changes as a result, but most local authorities do not. For instance, Cardiff City and County Council regularly consults with local people on a wide range of policies, plans and proposals affecting the local community. The Ask Cardiff section of the authority's website includes an analysis of results of surveys conducted by the Council led Cardiff Research Centre.

## Part 3

Homeless people or those at risk of homelessness get very different solutions depending on where they seek help in Wales



- 3.1 Local authorities recognise that preventing homelessness is a better outcome for homeless people. For many local authorities homelessness prevention is attractive in its potential contributions to financial savings, as well as easing the pressure on existing housing resources. A prevention-centred approach is, however, not an easy option for a local authority. Effective prevention work generally requires a more proactive approach, and demands greater flexibility and effort in order to achieve results. Authorities need to make available a range of options, directly and indirectly with partners, to make the most effective and long-term beneficial impact for a homeless, or potentially homeless, person.
- 3.2 In this part of the report we consider the range of options being used by authorities to address homelessness demand. We review current partnership arrangements, in particular the duty placed on local authority social services and housing associations to collaborate to prevent homelessness. We conclude this part of the report with an analysis of the effectiveness of local authority performance in preventing homelessness.

### **Most authorities have developed a range of choices to address homelessness but opportunities to broaden options remain**

- 3.3 To address homelessness local authorities need to ensure that they have a range of options available to them to both prevent someone from losing their home and to secure accommodation where the authority has a duty to provide settled accommodation. A broad range of effective solutions, provided either directly or in partnership with other organisations, is essential.
- 3.4 Part 2 of the 2014 Act provides authorities with options to use the private rented sector to assist applicants and to bring their homeless duties to an end where the accommodation provided is both suitable and available for a minimum period of six months. This is an important change to the former legislation governing homelessness in Wales. Previously an authority's duty required them to secure settled accommodation, primarily using social housing. The 2014 Act therefore provides authorities with potential access to a wider range of property to discharge their homelessness duties, in particular the private rented sector.

- 3.5 Work with private landlords needs to be carefully managed to ensure homeless people are able to access private rented homes. To achieve this, a number of authorities have appointed staff to develop their work with landlords to improve access to properties. For example, the City and County of Swansea Council, Carmarthenshire County Council and Bridgend County Borough Council have all recognised the importance of engaging with private landlords and have invested resources in developing and managing these relationships. Authorities are also creating funds to support their work with private landlords providing rent in advance, bonds or rent guarantees as a means of encouraging joint working to secure accommodation for homeless people.
- 3.6 Whilst the 2014 Act allows greater use of the private rented sector, authorities note that securing homes from private landlords is not always easy. The introduction of mandatory licensing of private rented homes under the Rent Smart scheme<sup>19</sup> has resulted in some landlords electing not to continue to rent homes because the licensing regime is considered too onerous. For example, landlords or their agents have to undertake approved training to obtain a licence. Licences are issued subject to a condition that the Code of Practice issued under the 2014 Act is adhered to.
- 3.7 We found that the range of options used by authorities has generally increased since the introduction of the 2014 Act. For example, all 22 authorities use grants or loans to cover rent deposit schemes for accommodation in the private rented sector, which help homeless people resolve their housing predicament. In 18 of the 22 authorities grant provision has increased since April 2015. Similarly, all authorities provide support to homeless people to help manage debt or rent/mortgage arrears, and 15 have seen an increase in this provision under the 2014 Act. Similarly, all 22 authorities are able to use mediation<sup>20</sup> services and in ten authorities provision has increased in the last two years.
- 3.8 Whilst the range of assistance provided by local authority homelessness service is increasing, we found that some authorities are yet to develop a comprehensive suite of solutions to tackle homelessness. For instance, eight authorities do not use guarantee of payment schemes. Nonetheless, since the 2014 Act options to prevent and address homelessness are increasing and authorities are focussing on providing a wide range of options to tackle homelessness. Our detailed analysis is set out in [Appendix 6](#).

<sup>19</sup> Rent Smart Wales processes landlord registrations and grants licences to landlords and agents who need to comply with the Housing (Wales) Act 2014. Rent Smart Wales is hosted by Cardiff Council who ensures compliance with the legislation in partnership with the other 21 Welsh local authorities.

<sup>20</sup> Mediation is a process for resolving disagreements in which an impartial third party (the mediator) helps people in dispute to find a mutually acceptable resolution.



- 3.9 Despite this positive picture, authorities face some challenges. Whilst the majority of authorities report that their preventative work is more effective following introduction of the 2014 Act, many state that success in preventing homelessness has only been possible because of the ring fenced grant from the Welsh Government. 15 of the 22 authorities also report that key services required to help prevent people becoming homeless in their area are currently unavailable or not available to the levels they need to meet demand. In particular, specialist housing for specific difficult to house groups, such as people with substance misuse issues, rough sleepers and young single people; affordable private rented accommodation; and supporting people services<sup>21</sup>.
- 3.10 One important service that all authorities state is critical to prevent people becoming homeless, are Supporting People services. Further information on how the total Supporting People budget of £124 million per annum is broken down and spent across the different categories of support can be found in the Auditor General's recent report on the Welsh Government's Supporting People Programme<sup>22</sup>. In brief, whilst spend within the Supporting People Programme specifically on generic floating support services for homelessness prevention has fallen by 25% from £21.3 million to £15.9 million between 2013-14 and 2016-17, the number of units of support has risen from 4,498 to 4,933 in this period. The pattern of supporting people services to homeless people is changing. Fieldwork authorities stated their use of generic floating support services for homelessness prevention allows them to proactively avoid homelessness from occurring or re-occurring.
- 3.11 We found that some authorities are using their Supporting People funds creatively. For example, the City and County of Swansea Council uses Supporting People monies to directly engage homelessness prevention officers to deliver prevention work, and Carmarthenshire County Council uses it to improve access to properties in the private rented sector and work with private sector landlords.

21 The Supporting People programme provides housing-related support to help vulnerable people to live as independently as possible. The Welsh Government invests over £124.4 million annually supporting more than 57,000 people to live as independently as they can. Supporting People funds housing related support services that a landlord (such as a housing association) or other provider such as a voluntary organisation can provide. Support means advice and help to make it easier for vulnerable people to maintain their independence. People can receive support in a hostel or in sheltered housing or other type of supported living as well as their own home through 'floating support services'.

22 [Supporting People Programme](#).

3.12 However, some authorities have not successfully aligned their Supporting People service with the prevention of homelessness. Joint working between local authority homelessness and Supporting People teams is often dependent upon internal authority management arrangements. Supporting People services located in Social Care departments often focus on social care priorities, and homelessness and housing services can be overlooked. Authorities we visited who are making best use of Supporting People monies to prevent homelessness are generally better integrated with housing teams and are good at incorporating homelessness data to inform their supporting people commissioning decisions. Generally, we found that such integrated planning results in better access to support services for homeless people.

### **Collaboration is seen as critical to preventing homelessness but the required contribution from partners is not always provided**

3.13 In recognition of the need to seek holistic solutions to better meet the needs of homeless people, the Welsh Government strengthened collaboration and partnership duties in the Housing (Wales) Act 2014. Section 95 places a duty on local authorities to promote co-operation between housing (homelessness) services and social services. Section 95 also places a duty to co-operate with named bodies, in particular housing associations. Both the local authority Social Services and housing association partners must comply unless the action proposed is incompatible with their duties, or has an adverse effect on their functions. In these circumstances a written reason must be provided as to why a Social Services or housing association is not intending to comply with their duty under the 2014 Act.

- 3.14 Given these new arrangements, the role of partners is integral to a local authority's success in preventing homelessness. This is recognised by homelessness services across Wales with 20 of the 22 authority responses to the Welsh Government's survey noting that the 2014 Act is resulting in stronger cooperation between local authority services, especially with social services, to help address homelessness. Whilst a small number of authorities highlight positive developments with, for example, environmental health officers and estates teams working together, joint working with the wider range of public sector services is mostly under-developed. In particular, ongoing issues around poor discharge coordination with inadequate timescales to effectively manage the needs of clients who are often released from institutions without any pre-planning or engagement with homelessness services. A number of authorities similarly identified challenges to the operation of the Prisoner Pathway<sup>23</sup>, including late notification of release and a lack of early planning between the relevant organisations.
- 3.15 Integrating processes is also an effective way of changing systems from allocating and rationing resources to finding the best solution in the medium to long-term. Capturing all potential needs/issues once, and sharing information with all relevant public bodies, improves efficiency and encourages holistic management responses for example by reducing the need to keep asking for personal information from applicants, and to adapt computer software that can track users from the point of entry into the system to successful conclusion.

<sup>23</sup> The Prisoner Pathway is a Welsh Government initiative for people who are facing homelessness when leaving prison to enable them to receive better support to improve their access to a secure home, rather than staying in bed and breakfast accommodation.

## Newcastle City Council's Active Inclusion Newcastle partnership to address homelessness

Newcastle City Council's Active Inclusion Newcastle (AIN) partnership is integrating services in response to the growth in demand for homelessness prevention advice and support. They help residents go through the transition needed when facing cuts in benefits payments. This is important because the council estimates Newcastle residents will lose £134 million annually by 2021-22. The top priority is to align budget processes to support the most vulnerable to prevent crisis. This includes integrating partner's staff training programmes and investing in research to develop a richer understanding of the balance of individual, systemic and structural causes of exclusion. In 2016 AIN trained 959 staff how best to talk to residents about digital, financial, employment and housing issues. As a result, no bed and breakfast accommodation was used since 2016, 3,775 cases of homelessness were prevented in 2015-16, and evictions reduced by 76%. In addition, 931 households were provided with emergency food, fuel, clothing or travel support; and membership of the Moneywise Credit Union increased to 8,276.

- 3.16 We found that some fieldwork authorities are improving joint working through, for example, co-locating services with partners. Sharing offices allows partners to identify people's support needs more quickly and make better quality referrals for support to take place. Officers told us that co-location is also allowing statutory and third sector agencies to develop and gain a greater insight into how each other operates, and is resulting in more rounded options to resolve people's homelessness situation.
- 3.17 However, a number of authorities also raise concerns that joint working with partner agencies is not always effective and needs to improve, particularly in respect of housing associations. Only eight of the 22 authorities note an improvement in joint working with housing associations. Whilst eight authorities have seen no discernible change in joint working since the introduction of the 2014 Act, six note that from their experience the 2014 Act is not resulting in more effective cooperation with housing associations.

- 3.18 Those authorities that have established effective working arrangements with housing association partners generally have some common characteristics. There are often a common housing register and a common allocations policy<sup>24</sup> in place and joint operational policies covering for example, pre-tenancy engagement, debt advice, tenancy support and training. Better performing partnerships also formalise their relationship in agreements between local authorities and housing associations which set out how they will operate to both prevent homelessness – for example, by avoiding or seeking alternatives to evictions for rent arrears and anti-social behaviour – and maximise the accommodation and support they make available to resolve homelessness.
- 3.19 However, we found that in other authority areas the relationship is not yet as well developed and the housing associations duty to comply in preventing homelessness is not always effective. In particular, choices made by some housing associations are reducing some local authorities' abilities to deliver their homelessness duties. For instance, housing associations may exclude certain individuals from housing registers and/or an allocation to an empty home either because they have been assessed as being unable to afford the rent and rehousing them would set them up to fail, or because they are considered as being unable to manage a tenancy.

24 Common Housing Registers provide a single point of access for all people seeking social housing in a local authority area providing applicants with more choice and a more efficient service by removing the requirement for them to apply multiple times to different organisations. A Common Allocations Policy sets out how landlords prioritise who they house with all landlords following the same priorities for letting a home rather than operating their own individual policies. This both simplifies the process for letting homes but also increases the prospects of those in the greatest housing need (to whom local authorities have statutory duty) securing housing.

- 3.20 Similarly, some authorities highlight issues of concern over rent levels with some Association rents considered too high for homeless clients. In particular, housing developed without social housing grant<sup>25</sup> and let on intermediate or market rents<sup>26</sup> which are higher than housing benefit thresholds are seen as beyond the reach of homeless people.
- 3.21 Unaffordable rents is a growing risk for a number of authorities we visited who commented that some association rents exceed housing benefit levels and are unaffordable for many homeless clients, even those in work. For example, median gross weekly earnings for full-time adults working in Wales were £492.40 in April 2016. This is 91.4% of the average for the UK (£538.70). Median gross weekly earnings in Wales were the second lowest amongst the 12 UK countries and English regions<sup>27</sup>.
- 3.22 Of particular concern for local authority homelessness services are the difficulties single people face in accessing association housing, specifically young single people. This is especially worrying as homelessness data shows that single people account for a large number of those threatened with homelessness and proportionally are increasing. In 2015-16 43.9% of all those who were threatened with homelessness were single people. In 2016-17 this increased to 47.6%. With regard to provision of temporary accommodation, the proportion of single provided with assistance has remained consistently high with single people accounting for broadly 60% of all those provided with temporary housing by authorities in each quarter since April 2015.

25 Social Housing Grant is a grant given to housing associations by the Welsh Government to provide new affordable housing for rent or low cost home ownership.

26 Intermediate and market rented properties owned by housing associations. Market rented properties have rent levels the same as private renting. Intermediate rents are typically set at 80% (or less) of market rents.

27 Annual Survey of Hours and Earnings: 2016 provisional results, ONS, October 2016.

- 3.23 Associations we interviewed noted that authorities have often not clearly set out how they intend to work with their partners to deliver the Section 95 duty to cooperate. Protocols or frameworks that clearly set out expectations on associations are not in place and little work has been undertaken to quantify an authorities homeless service expectations. A number of association staff note that local homelessness partnership forums – which can provide an effective opportunity to review current performance and identify opportunities to improve how services are delivered – often do not meet or are ineffective at addressing problems. Because of poor engagement, authority homelessness teams are not clearly setting out their expectations of partners and authority leadership on homelessness is considered limited and ineffective.
- 3.24 The accuracy and flow of information between authorities and associations can often be inadequate. Several association staff members highlighted ongoing difficulties with the quality of referral data under nomination agreements. Too often key information from local authorities is inaccurate or absent which delays or stops a nomination for housing progressing. Given our findings – which echo recent research by Shelter Cymru in 2016<sup>28</sup> and Community Housing Cymru<sup>29</sup> and the Welsh Local Government Association in 2014<sup>30</sup> – there are ongoing challenges for partners delivering Section 95 of the 2014 Act.

28 Accessing and sustaining social tenancies: exploring barriers to homelessness prevention, September 2016, Shelter Cymru.

29 Community Housing Cymru is the representative body representing more than 70 not-for-profit housing associations and community mutuals in Wales.

30 Partnership working and homelessness: research on co-operation between housing associations and local authorities in respect of homelessness, Community Housing Cymru, Welsh Local Government Association and Welsh Government, March 2014.

## National Performance Indicators suggest some success in preventing homelessness, but authorities' performance varies too widely and there is an insufficient focus on demonstrating services are available to all

- 3.25 Prior to the introduction of the Housing Act 2014, local authorities in Wales collected data against a range of indicators across their homelessness and advice services collated and published nationally via StatsWales<sup>31</sup>. Data covered a range of inputs – for example, the number of individuals/families applying for homelessness assistance – and outputs such as the decisions made in respect of individual applications to an authority.
- 3.26 In developing the new homelessness legislation the Welsh Government recognised that new data sets and indicators are required to be able to evaluate the implementation of the 2014 Act<sup>32</sup>. New performance measures were introduced from April 2015 and focus on three key areas: firstly, whether the number of people threatened with homelessness is increasing or falling; secondly, how successful authorities are at preventing homelessness; and finally, whether use of temporary accommodation is increasing.

### The number of people threatened with homelessness is rising but performance by authorities in successfully preventing homelessness is beginning to fall

- 3.27 Since the introduction of the 2014 Act the number of households threatened with homelessness who have approached local authorities for assistance has significantly increased, rising by almost a third (29.2%) from 7,218 in 2015-16 to 9,210 in 2016-17. The main threat of homelessness remains loss of rented or tied accommodation, parents no longer willing or able to accommodate, and breakdown in relationship with partners. Only the number of potentially homeless people discharged from an institution or care facility (eg hospital, residential home, army etc.), and those experiencing violence and harassment fell between 2015-16 and 2016-17. [Appendix 7](#) provides a detailed analysis of the reasons people are threatened with homelessness at an all Wales level in 2015-16 and 2016-17.
- 3.28 With regard to preventing homelessness, there is a mixed picture on how effective authorities are – [Exhibit 7](#).

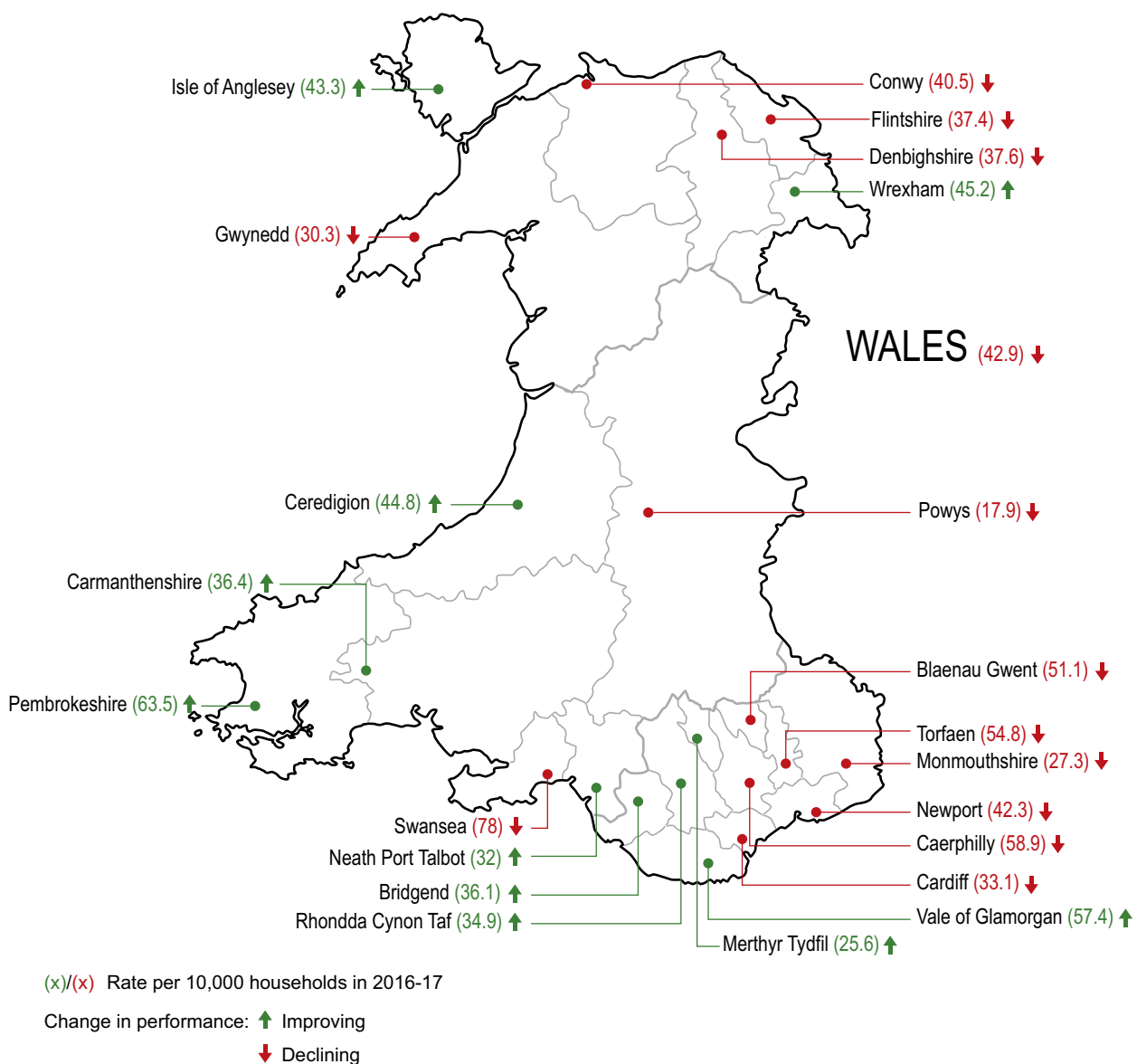
31 StatsWales provides data on a range of services provided by public bodies in Wales.

32 Because of changes to the performance management framework, it is not possible to compare performance in 2015-16 and 2016-17 with data in previous years as the definitions changed and do not allow for a like-for-like comparison.



**Exhibit 7 – Percentage of households successfully prevented from homelessness and homelessness rate per 10,000 households in 2015-16 and 2016-17 by local authority and all Wales average**

There is a wide range of performance in preventing homelessness with the best authorities preventing over 70% of homeless cases. Conversely, poor performing authorities are delivering successful prevention actions in less than 50% of cases.



Source: HOUS0415: Prevention of Homelessness by Area and Measure (Section 66), Annual data return to StatsWales. This data has not been audited.

| <b>Local authority</b> | <b>2015-16 (%)</b> | <b>2016-17 (%)</b> |
|------------------------|--------------------|--------------------|
| Gwynedd                | 84.5               | 77.5               |
| Pembrokeshire          | 68.8               | 73.4               |
| Caerphilly             | 78.2               | 73.3               |
| Isle of Anglesey       | 60.1               | 72.8               |
| Swansea                | 75.4               | 72.6               |
| Ceredigion             | 69.3               | 70.8               |
| Bridgend               | 64.2               | 66.6               |
| Wrexham                | 59.4               | 64.2               |
| Carmarthenshire        | 53                 | 64.2               |
| Rhondda Cynon Taf      | 48.7               | 63                 |
| Flintshire             | 75.9               | 62.8               |
| Powys                  | 71                 | 61.3               |
| Wales                  | 64.5               | 62.1               |
| Merthyr Tydfil         | 44.4               | 61.1               |
| Monmouthshire          | 73.8               | 58.4               |
| Conwy                  | 70                 | 57.9               |
| Vale of Glamorgan      | 53.9               | 56.5               |
| Neath Port Talbot      | 52.2               | 54.6               |
| Denbighshire           | 55.1               | 54                 |
| Cardiff                | 70.6               | 52                 |
| Blaenau Gwent          | 58.6               | 51.9               |
| Torfaen                | 64.1               | 49.8               |
| Newport                | 62.5               | 49.3               |

- 3.29 The Exhibit shows that whilst the proportion of cases where homelessness has been prevented only marginally fell between 2015-16 and 2016-17, in some authorities there have been significant changes. Overall ten authorities have seen an increase in the percentage of homelessness they prevent and 12 have seen a fall in performance. The most notable improvements are in Merthyr Tydfil and Rhondda Cynon Taf where performance improved by over 15 percentage points. Conversely, four authorities record reductions in prevention work of roughly 15 percentage points, most notably Cardiff which has seen a 20 percentage points decline in prevention work. In respect of the rate of successful preventions per 10,000 households – the probability or ratio of a certain outcome happening for the wider population in an area – performance is similarly wide ranging. In 2016-17, Powys are preventing homelessness for roughly 18 households per 10,000 population compared to Swansea who successfully prevent homelessness for 78 households out of every 10,000 households.
- 3.30 Local housing authorities have a duty to secure temporary accommodation for homeless households. For example, households might be placed in temporary accommodation pending the completion of inquiries or they might spend time waiting in temporary accommodation after a homeless application is accepted until suitable secure housing becomes available. We found that the number of households placed in temporary accommodation continues to rise in Wales, by 7.5% from 1,872 households at the end of June 2015 to 2,013 households at the end of March 2017. [Appendix 8](#) provides a more detailed analysis of the change in temporary accommodation by quarter in 2015-16 and 2016-17.
- 3.31 Taking these three key measures of performance together, the data shows that the number of people who are threatened with homelessness in Wales is increasing, successful prevention work is declining, and use of temporary accommodation is growing. Whilst this information only covers two years of activity, our analysis suggests that authorities face some significant challenges in managing and preventing homelessness. This is echoed by recent research by Shelter Cymru<sup>33</sup> which suggests that the official statistics undercount the level of homelessness by roughly 3,000 households in 2016-17.

33 Reasonable steps: experiences of homelessness services under the Housing (Wales) Act 2014, Shelter Cymru, 2016.

- 3.32 Whilst StatsWales data on homelessness is useful to measure aspects of performance, the current focus of activity does not always give an indication of either the quality of the service provided, or the success of local authority interventions in addressing homelessness. For example, performance indicators are still too limited to provide a robust and meaningful picture of how 'successful' homelessness services are in dealing with the complex needs of clients, and too often judge performance on short-term inputs and outputs not longer-term impact and improvement for individuals.
- 3.33 A small number of authorities also acknowledge they have some practical challenges in effectively measuring and managing their homelessness performance. Three authorities state that they do not have sufficient resources and capacity to review performance, and five that they are either in the process of or planning to upgrade their homelessness IT systems to be able to record and monitor their homelessness performance more accurately.

### **Local authority performance management arrangements do not focus sufficiently on demonstrating that services are provided equally for all citizens which undermines their ability to fully meet the Public Sector Equality Duty**

- 3.34 The Equality Act 2010 brings together and replaces previous anti-discrimination laws with a single Act. It aims to make it more consistent, clearer and easier to follow in order to make society fairer. The Equality Act 2010 aims to remove inconsistencies and make it easier for people to understand and comply with it. An important aspect of the Equality Act 2010 is the creation of the public sector equality duty.
- 3.35 Under the Public Sector Equality Duty (PSED), listed bodies are required to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the act. Listed bodies must also advance equality of opportunity between people who share a relevant protected characteristic and those who do not. They should also seek to foster good relations between people who share a protected characteristic and those who do not. Public authorities are listed in Schedule 19 of the Equality Act and include local authorities.
- 3.36 The broad purpose of the PSED is to integrate consideration of equality and good relations into the day-to-day business of local authorities. Importantly, the PSED requires authorities to consider how a function can affect different groups in different ways. Failure to do this can contribute to greater inequality and poor outcomes simply because services are configured and delivered in ways that people with protected characteristics are unable to use them.

3.37 Key to complying with the PSED is to ensure that there are robust monitoring and evaluation arrangements in place. By monitoring protected characteristics data, local authorities should ensure that access to services is equal to all, and that those most vulnerable can be identified and treated appropriately. The findings of our review suggest that there are some significant weaknesses in current arrangements, and some authorities are not complying with their responsibilities under the PSED.

3.38 **Exhibit 8** below summarises the findings of the Welsh Government’s survey of local authorities on the implementation of the 2014 Act in respect of people with protected characteristics. Current performance falls short of the requirements of the Equality Act 2010 and local authorities are not able to consistently demonstrate how their homelessness services meet their PSED responsibilities.

**Exhibit 8 – Coverage of local authority monitoring systems for homelessness people and those threatened with homelessness with protected characteristics.**

| <b>Protected characteristics, as defined in the Equality Act 2010</b>                 | <b>Number of Welsh local authorities collecting this information</b> |
|---|--|
| Age   | 15   |
| Disability  | 15   |
| Gender reassignment   | 12   |
| Marital status (including Civil Partnership)  | 11   |
| Pregnancy and maternity status  | 15   |
| Race (includes race, colour and nationality – citizenship, ethnic or national origin) | 14   |
| Religion or belief  | 12   |
| Sexual orientation  | 13   |
| No equalities data collected  | 6  |

Source: Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report, 8 August 2017, Welsh Government.

## Part 4

Local authorities and partners need to focus on tackling the underlying causes of homelessness but are not giving this sufficient focus in their strategic responses



- 4.1 In preceding sections of this report we have set out how local authorities are responding to the challenge of preventing homelessness. The Housing Act (Wales) 2014 fundamentally changed the statutory responsibilities of local authorities by shifting the focus of their work away from investigating and assisting only those who met strict criteria, to preventing homelessness wherever possible.
- 4.2 The rationale and benefits of prevention work is very clear. For homeless people there should be less personal disruption and uncertainty with local authority support and assistance seeking to maintain occupation where possible in the current home. For local authorities, there should be a more effective use of resources to better manage demand through proactive engagement with clients at a far earlier stage, and before they present for assistance in crisis.
- 4.3 Despite the changes made by the 2014 Act, the timing of local authority responses are also still focussed at the point when people are in crisis and losing their home. The underlying causes of homelessness – the reasons why certain groups in society are more at risk than others – remain unchallenged.
- 4.4 In this section of the report we consider how well positioned local authorities are to deliver sustainable solutions that prevent homelessness from occurring. The Wellbeing of Future Generations Act 2015 provides an opportunity for authorities and partners to take a long-term, preventative approach working in collaboration through integrated services that involve and meet citizens' needs. There are some important lessons for public bodies to draw from the approach to homelessness prevention in how they manage demand in other areas of activity.

## Local authorities and partners continue to deal with the symptom of homelessness not its cause

- 4.5 Homelessness is often caused by a complex interplay between a person's individual circumstances and adverse 'external' factors outside their direct control. Personal factors such as a lack of qualifications, lack of social support, debts – especially mortgage or rent arrears – poor physical and mental health, and getting involved in crime at an early age. Family background is also recognised as a contributory factor particularly relationship breakdown and disputes, sexual and physical abuse in childhood or adolescence, having parents with drug or alcohol problems, and previous experience of family homelessness<sup>34</sup>. These problems can also build up over years until the final crisis moment when a person becomes homeless.

<sup>34</sup> Tackling Homelessness: A Rapid Evidence Review, Public Policy Institute for Wales, February, 2015.

- 4.6 The impact of demand for public services and dependency on them can be generational and require long-term commitment and focus from public bodies to address. For example, health inequalities, poverty, educational attainment, and dealing with long-term unemployment. Homelessness can be caused by structural issues, social and economic factors often outside the control of the individual or family concerned such as:
- a poverty, which is often linked to unemployment or low wages;
  - b a lack of affordable housing and wider local and national policies for housing on allocations, exclusions and tenancy management;
  - c wider national policy developments, such as the closure of long-stay psychiatric hospitals; management of immigration and asylum; decisions on discharge from prisons and the armed forces; and
  - d UK government welfare policies – particularly the restructuring of the whole system of working age benefits with the introduction of Universal Credit, the benefit cap, single room subsidy and revised sanctions.
- 4.7 Research in Wales and across the UK<sup>35</sup> shows that these structural and individual factors are often interrelated and are the underlying cause of homelessness. Individual issues can arise from structural disadvantages such as poverty or lack of education. While personal factors, such as family and social relationships, can also be put under pressure by structural forces such as poverty. These are ultimately the reasons why certain individuals and groups and in society are more at risk of becoming homeless than others. Homelessness is consequently the result of service failure, wider-economic impacts and a complex range of generational problems.

<sup>35</sup> The homelessness monitor: Wales 2015, Crisis, August 2015; and Tackling homelessness and exclusion: understanding complex lives, Homeless Link, September 2011.



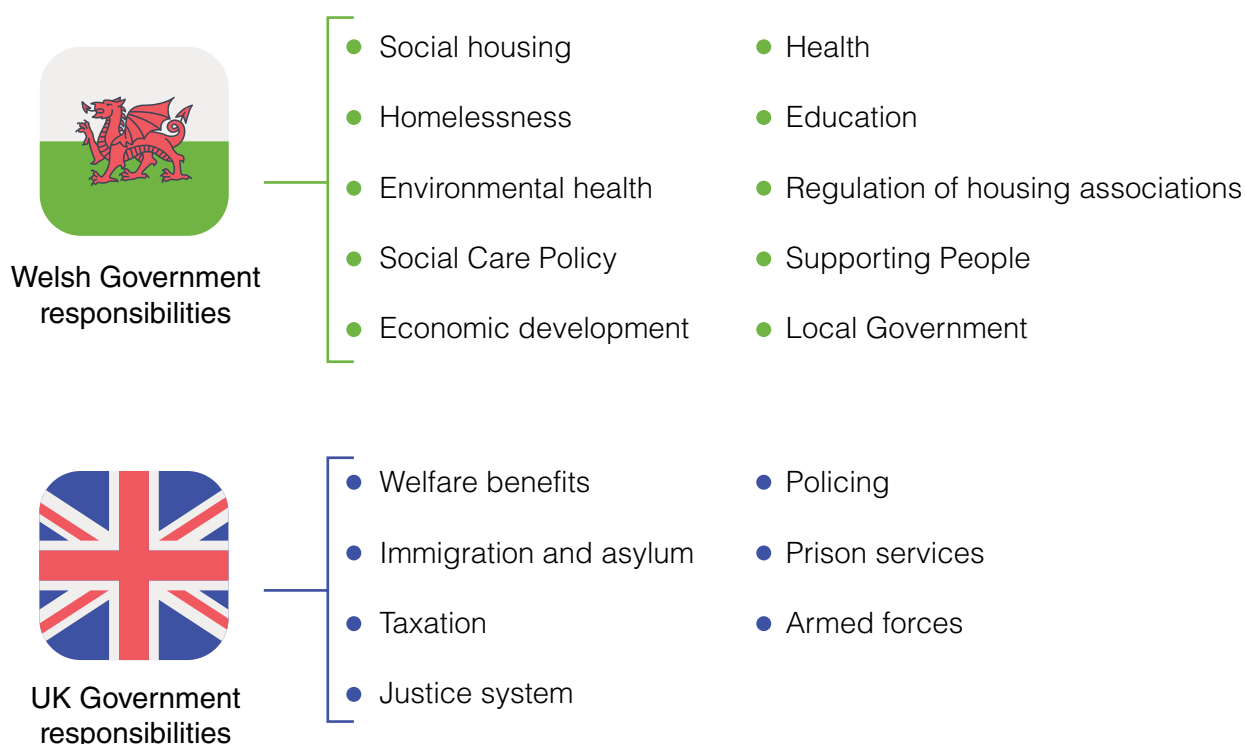
## Homelessness is often influenced by decisions that public bodies in Wales cannot affect or prevent

- 4.8 Addressing these structural issues also requires long-term policy solutions such as changes in the housing benefit system, the building of more affordable homes and joined up policy making across housing and other services. Resolving the impact of policy<sup>36</sup> choices on homeless people can be complicated as responsibilities for different programmes, funding streams and organisations are split within the UK and not always devolved to Wales. Demand for public services can therefore be created as a result of individual policy choices; by unintended consequences of policy choices; and/or exacerbated where different policy decisions are poorly framed or not aligned and work against each other.
- 4.9 Tackling complex problems like homelessness clearly benefits from alignment of policies to maximise the positive impact of some choices and limit the unintended consequences of others. However, where policies do not complement each other, problems can occur. **Exhibit 9** shows the complexity of policy devolution in Wales. The Welsh Government is responsible for many areas of daily life in Wales. These areas include: education, health, local government, environmental health, economic development and social services. However, the UK Government is still responsible for certain public services in Wales, for example immigration, policing, prisons and the justice system. Most importantly for homelessness it is the Westminster Government which sets the policy for tax and welfare benefits.

36 Generally speaking public policy is what the government chooses to do, or not to do. It is a decision made by the government to either act, or not act in order to resolve a problem. Public policy is a course of action that guides a range of related actions in a given field. They rarely tackle one problem, but rather deal with clusters of entangled and long-term problems.

**Exhibit 9 – Policy responsibilities of the UK and Welsh Governments that affect homelessness in Wales.**

Areas of policy making that can impact upon a local authorities ability to prevent homelessness



Source: Wales Audit Office analysis.

4.10 One of the significant impacts of the 2014 Act for the local government in Wales is the broadening of responsibilities to single people. Local authorities are now required to provide help to everyone at risk or homelessness, a significant departure from the previous system where many single homeless people were not provided with the same level of support and assistance as they receive now. As our research identifies, single people now account for almost half of those who are threatened with becoming homeless who approach local authorities for assistance and nearly two-thirds of those who occupy temporary accommodation. Single people account for a considerable amount of local authority’s homelessness work.

4.11 Whilst the Welsh Government emphasises the importance of local authorities seeking to meet the needs of homeless single people through better use of the private rented sector, and delivery of a broader range of options to resolve homelessness, this is made difficult because of the impact of conflicting policy choices of the UK Government. These are policies made in Westminster which impact public bodies and citizens in Wales, but neither the Welsh Government nor local authorities are able to influence these. In particular, as noted above in paragraphs 3.22 and 3.23, the difficulties of addressing single homelessness, especially young people aged between 25 and 34 years old, who present a particular challenge for authorities and their partners.

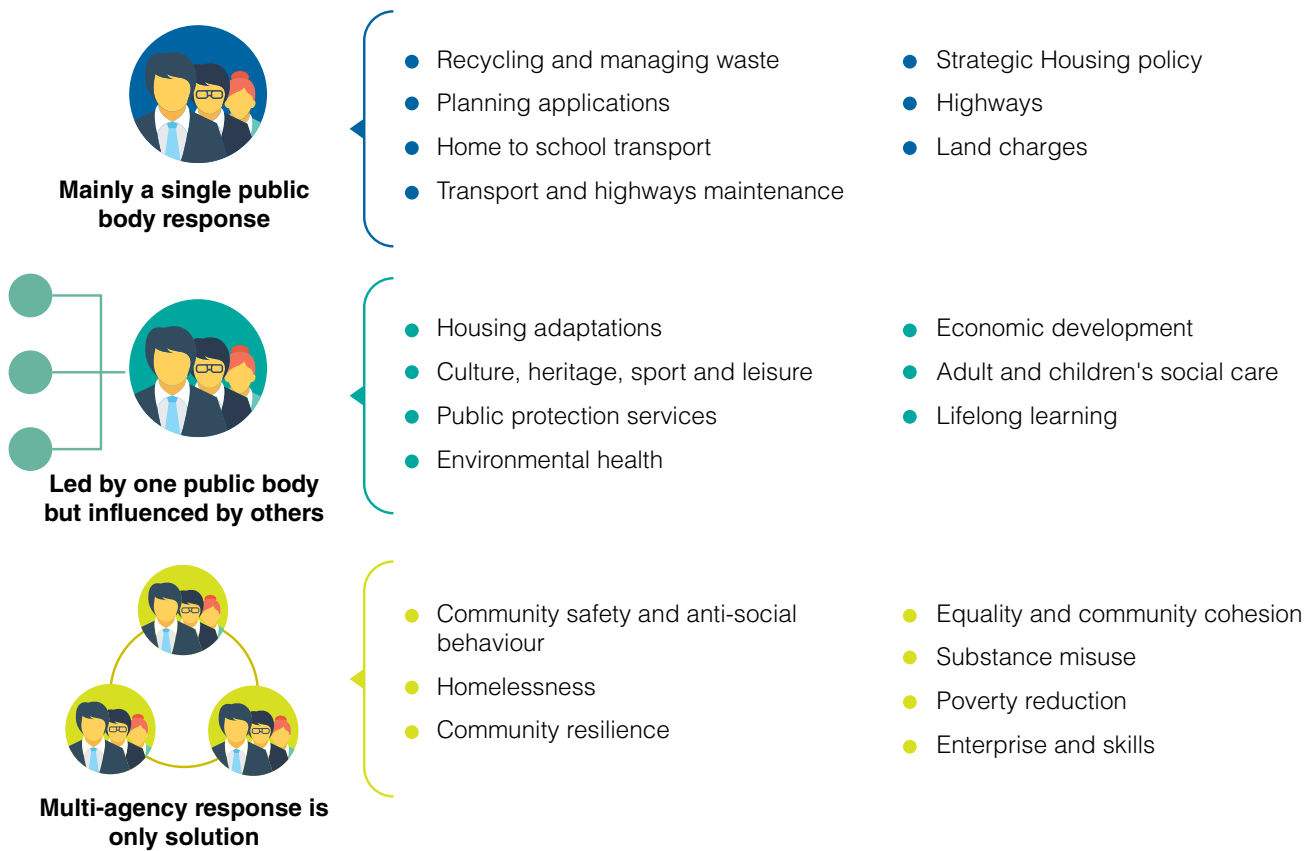
### **Addressing homelessness demand is often seen as a single body's duty rather than a wider public service responsibility**

4.12 To tackle the intricate problems of homelessness requires a response from a range of public and third sector bodies not just local authorities. Local authority housing service cannot resolve the complex inter-related issues of homelessness alone. Homelessness is more than a housing problem with much of what causes homelessness being outside the control and influence of local authorities' homelessness services. However, despite this, it is the local authority which has the statutory duty to prevent and address homelessness.

4.13 When developing the 2014 Act the Welsh Government recognised that tackling homelessness is wider than a local authority housing service and a multi-agency response is required to be truly effective. Hence the decision to create specific duties under Section 95 for local authority social services and housing associations to co-operate with homelessness services. However, as noted above, the duty to cooperate is not working consistently across all of Wales and the key partners that can contribute to tackling and preventing homelessness from occurring are not always effectively supporting this outcome.

4.14 **Exhibit 10** sets out the complicated picture of policy and delivery with an increasing number of services and functions being influenced by and dependent upon others. Whilst it is positive that the current statutory framework seeks to encourage some agencies to manage demand and support the housing outcomes of homeless people, it does not go far enough. It falls short of being a fully preventative multi-agency approach that goes beyond housing interventions, and it needs to be much broader than the duty to cooperate placed on local authority social services and housing associations. Local authorities and others contribute to tackling homelessness in a variety of other indirect ways. For example, by encouraging local economic development; as a major employer in the area; through the development of new infrastructure, homes and transport; and, most importantly, as the key agency in Public Service Boards<sup>37</sup> and other areas of multiagency partnership work focused on homelessness.

**Exhibit 10 – The interlinkage between public bodies in the delivery of services to citizens.**

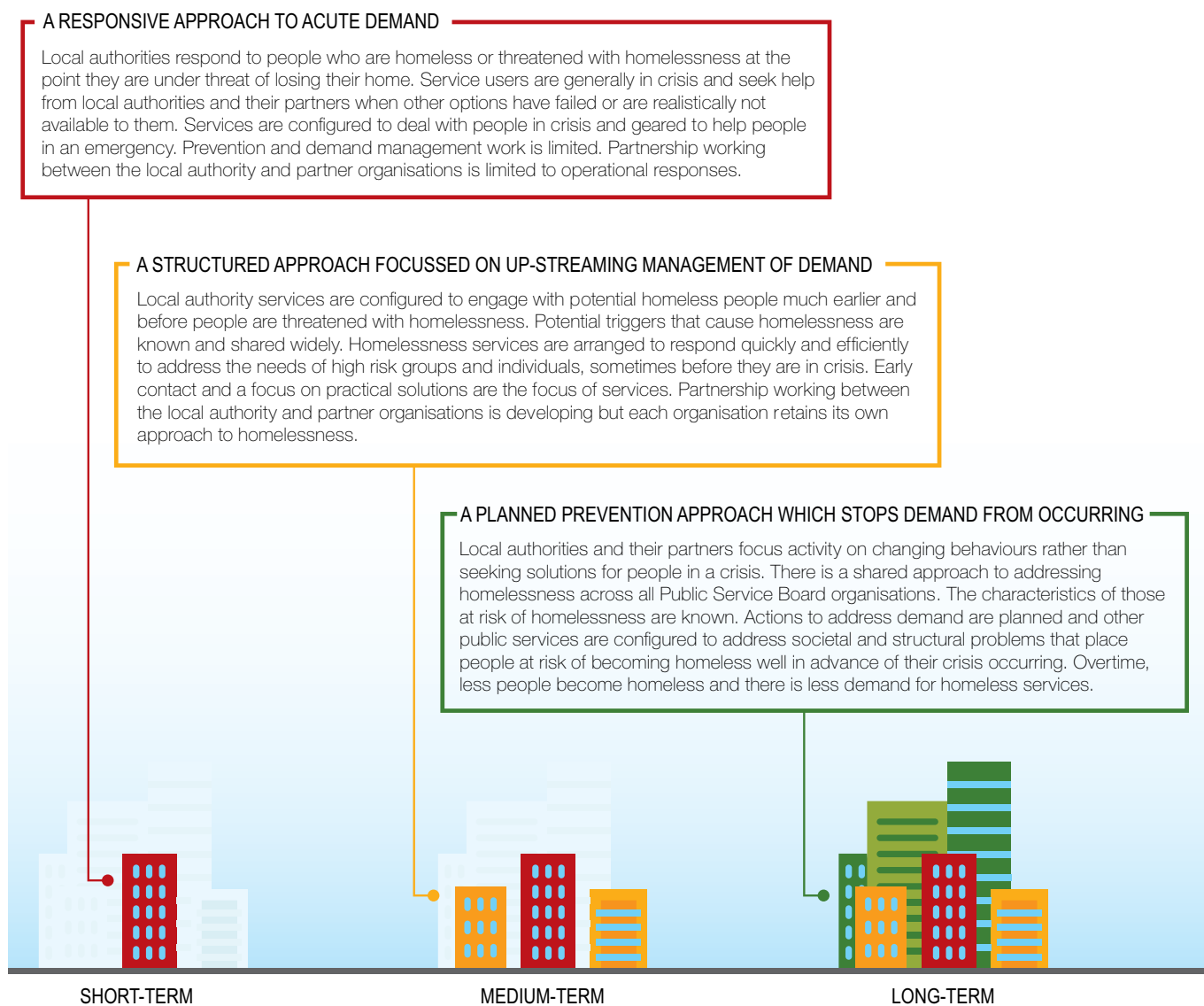


Source: Wales Audit Office analysis.

37 The purpose of Public Services Boards is to improve the economic, social, environmental and cultural well-being in its area by strengthening joint working across all public services in Wales.

- 4.15 Whilst becoming homeless is a visible 'symptom' of a homeless person's moment of crisis, the provision of housing or support to maintain housing is still a 'crisis' response. Much of the current work of local authorities in preventing homelessness is still reactive with services focussed on dealing with people when they are in crisis rather than stopping them getting into crisis in the first instance. For local authorities and their partners to tackle the fundamental and underlying causes of homeless requires them to take a long-term strategic approach.
- 4.16 From our review we have identified three levels of sustainable prevention work that influence the levels of demand for a service – [Exhibit 11](#). We classify most authorities as operating at level one or two, focussing resources on short to medium-term responses but dealing with people who are generally in crisis. Responses are mostly driven by a single service perspective and collaboration operates at the margins of activity rather than centrally driving decisions. Consequently, prevention responses do not make the most of all resources within the local authority and with partners to build solutions that are aligned to manage demand and reduce long-term dependency on services. Overall, we have concluded that no authority has yet progressed to level three taking a truly long-term preventative approach focussing services on the enduring societal issues that create homelessness.

## Exhibit 11 – The sustainability of approaches to managing demand for homeless services.



Source: Wales Audit Office.

- 4.17 To achieve a truly sustainable and long-term approach that prevents homelessness from occurring requires political buy-in. Authorities need a clear vision and strategy that transcends public bodies which understands what people need; what their demands are; and consider the most effective way of reducing demand and any over-dependency on public bodies. It is vital that local politicians lead a new conversation with citizens that is more collaborative. Citizens and users need to be ready and prepared for any changes and public bodies need to recognise that no single body can deal with demand, they need to collaborate and it will require joint processes and systems.
- 4.18 Sections 50 to 52 of the Housing (Wales) Act 2014 requires authorities to periodically undertake homelessness reviews and produce homelessness strategies by April 2018. The 2014 Act requires authorities to assess the current and likely future levels of homelessness in a local authority area; the range of current provision to prevent homelessness; current provision of suitable housing and support; and the resources available within the authority and from partners to tackle homelessness. The findings of the review should be used to formulate a homelessness strategy which sets out the actions and plans to prevent and address homelessness within the authority area.
- 4.19 A recognised weakness of previous local authority homelessness strategies is the lack of attention on future demand. Needs assessments and strategic planning too often concentrated on current service pressures and the actions required to address these short-term acute issues. Little focus was given to medium to long-term issues. Few authorities focus on understanding the causes of demand, how to manage demand or how to equip citizens to become more self-resilient. This is important. By increasing self-resilience, and changing where actions are focussed, citizens will be better able to manage their issues without recourse to authority services. We did identify some early policy development that recognises the need to shift from reacting to demand, to preventing demand from arising.

- 4.20 We have highlighted above the short termism of authorities and their partners in preventing homelessness. Few good examples exist of local authorities taking a strategic and holistic approach to planning prevention and demand management activity to address homelessness over the longer-term. Often this is because the financial case for addressing homelessness demand is largely built on predictive modelling rather than real evidence; fully developed examples are rare. In addition, and as noted in paragraph 1.17 many prevention and demand management strategies are initiative-led rather than a collective and strategic plan of action. In addition, longer-term forecasting of demands and community needs is generally a weaker area despite being encouraged by the Welsh Government to feature in Wellbeing Assessments.
- 4.21 However, many authorities are still not focussing on addressing these weaknesses. For example, 13 authorities responding to the Welsh Government survey on implementation of the 2014 Act stated they have experienced an increase in demand for their homelessness services. Our review of well-being assessments found that whilst authorities are aware that demand on homelessness services is going to increase, many Public Service Boards have not set out how services might be designed or re-aligned to either cope with the increase in overall demand, or how public bodies will collectively tackle the underlying causes of demand. Only three well-being assessments specifically mentioned self-reliance and independence amongst residents as a priority to help reduce demand on services, but even in these limited examples there was no detail on how this will be achieved. To enable a long-term preventative focus on addressing homelessness authorities need to focus on the broader issues that create demand to truly prevent people becoming homeless.
- 4.22 Given authorities have until April 2018 to complete their homelessness reviews and produce their strategies, we found that at the time of our fieldwork few had made significant progress. Denbighshire County Council completed its review of homelessness services in 2016 publishing the findings online following detailed engagement with stakeholders, including service users. The authority plan to use the findings of their review to develop their homelessness strategy. To support development of its strategy the authority created a multi-agency homelessness forum to guide its work on tackling homelessness. This forum has responsibility for developing and implementing the strategy and to address the key causes of homelessness.



## Denbighshire County Council – homelessness strategy development

Through its homelessness review, the authority consulted partners and stakeholders to identify and agree the key objectives to tackle and prevent the main causes of homelessness. The review was used to develop the authority's homeless strategy. The strategy focuses on prevention, securing more accommodation and access to support services and aims to:

- ensure that suitable accommodation is and will be available for people who are, or may become homeless;
- collaborate with NHS, Criminal Justice and Community Safety agencies to meet the needs of people and households who are at risk of homelessness;
- ensure that satisfactory support is available for people who are, or may become homeless; and
- plan homelessness services regionally where appropriate, taking account of the emerging changes to Local Government boundaries.

The authority recognises that the key approach to community support is the change in emphasis from dependence to enabling people to live independently, with control and choice over their own needs and solutions. Its homelessness strategy and associated action plan reflects this principle and specifies how the authority's Senior Leadership Team and relevant Members will be kept informed and engaged throughout its implementation.

4.23 At the time of our on-site work most fieldwork local authorities had not started their homelessness reviews. A small number highlighted that they did not have sufficient capacity to focus on reviewing and developing a strategic response to homelessness. This lack of capacity comes at a time when homelessness is increasing.

## There are lessons to be learnt from how local authorities have responded to preventing homelessness in the design and delivery of other services to better manage demand

4.24 There are some important lessons for public bodies to draw from the approach to homelessness prevention in how they manage demand in other areas of activity. Many of these align with statutory responsibilities of the Well-being of Future Generations Act 2015 which provides an opportunity for authorities and partners to take a long-term, preventative approach working in collaboration through integrated services that involve and meet citizens' needs.

4.25 We found from our review of homelessness services that it is important for authorities to take a strategic focus on managing demand. Public bodies need to avoid narrowly defining potential demand and should not just concentrate on the services they provide but on how public bodies collectively work together to stop demand arising in the first instance. With this in mind, Public Service Boards offer an opportunity to focus on shared priorities by collaborating and then integrating services to combine efforts. Positively, authorities are starting to focus on the strategic management of demand as highlighted in the following good practice ([Appendix 8](#) includes further examples of how public bodies are seeking to increase citizens' resilience to better manage demand).

#### [Good practice examples in how some local authorities are seeking to address demand](#)

##### **The City and County of Swansea Council**

places wellbeing and demand management within its Prevention Strategy for 2017-20. The strategy forms part of its corporate transformation programme and highlights the authority's priority "supporting people to become resilient and achieve outcomes that they want to see in their own lives, which will in turn reduce demand on services." The strategy refers to data up to 2030 and considers what has worked in Swansea and elsewhere in the UK, and different types of demand that need to be modeled and addressed. This provides a good starting point for the authority to manage its own behaviour and that of its customers.

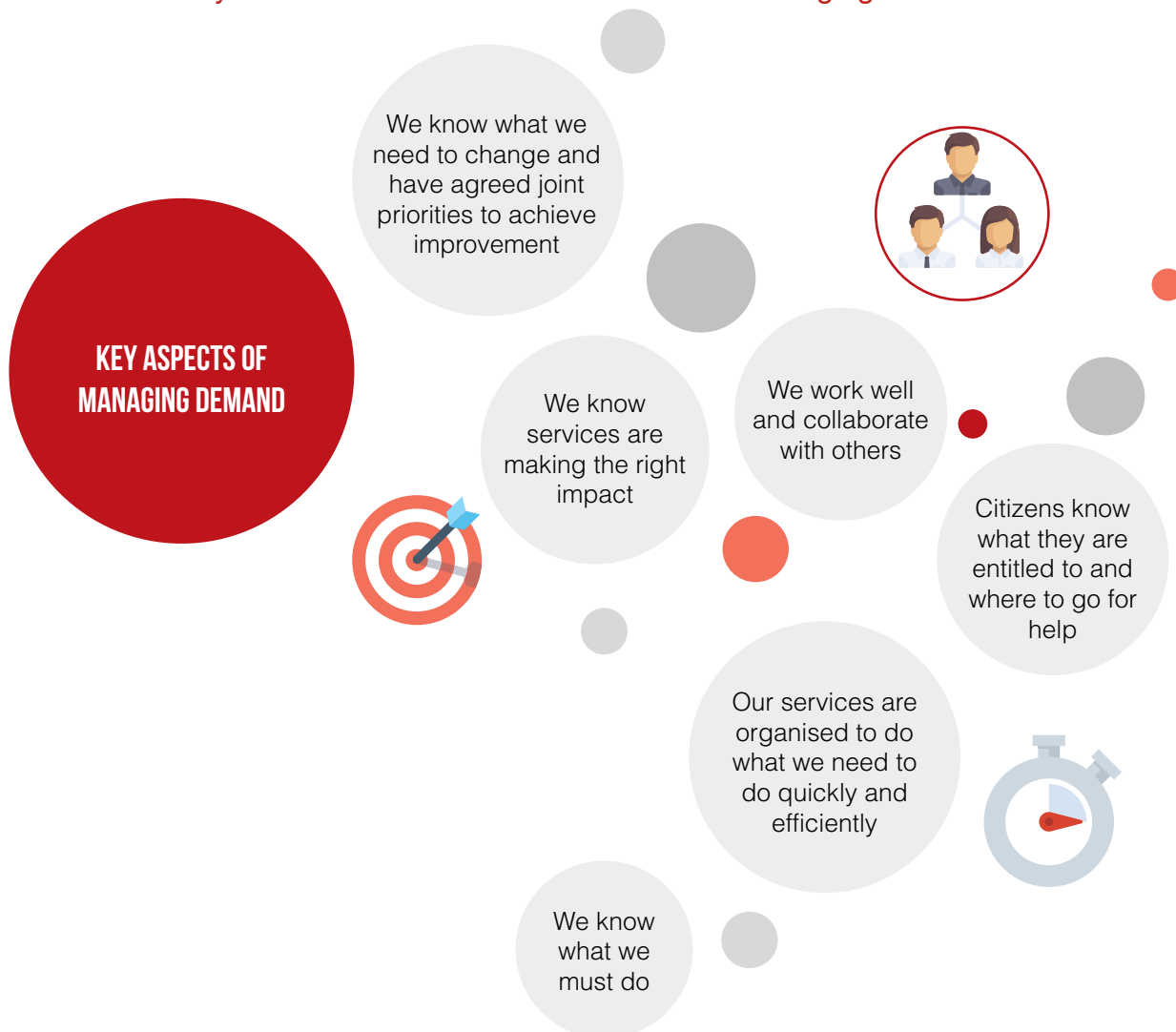
##### **Denbighshire County Council**

held a 'county conversation' looking at what services people want and what 'social capital' exists in local communities to both support the authority to sustain services, but also influence changes in behaviour amongst service users. Demand management is also a reoccurring theme in local authority transformation models. Blaenau Gwent County Borough Council's Customer Transformation Strategy for 2016-21 places demand management principles and customer insight at the heart of its transformation of customer service and access principles.

- 4.26 In considering the long-term strategic design and delivery of services authorities need to avoid misaligning or designing services that create blockages and ‘failure demand’ in delivery of homelessness services. Part 2 above highlights some of the demand problems in delivery of homelessness services created by poor design. Local authorities need to therefore carefully consider how they design and deliver services to:
- a align policy and manage demand, public services need to work together and agree priorities based on broad ranging, up to date and good quality data and use this information to direct where they should spend their monies focusing on longer-term investments;
  - b ensure staff have the right skills to deliver preventative services by equipping staff to focus on problem solving, negotiating, mediating and influencing people;
  - c organise services to efficiently and consistently engage with service users as quickly as possible;
  - d make certain good quality, accessible and accurate advice and information is made widely available on what people are entitled to and what they will not receive – our survey findings highlight that service users assume authorities provide more assistance and help than they can and often do;
  - e make best use of digital services and ensure online services are accessible and encourage usage through good connectivity and a good user experience;
  - f avoid gate keeping and ensure services are down streamed to engage as early as possible with potential service users to reduce demand;
  - g ensure the contribution of all organisations and all funding streams are aligned and focused on the common issues that communities and their public services are facing;
  - h ensure a broad range of options to address demand rather than single service solutions; and
  - i take an holistic view to service delivery and ensuring public bodies rather than single agencies take responsibility for addressing demand.

4.27 Ultimately, preventing ongoing demand for services represents good value for money. To work effectively requires a minimum level of agreement and understanding on how best to deliver services. However, this needs public bodies to embrace new ways of working and longer-term thinking<sup>38</sup>. **Exhibit 12** illustrates the key factors we have identified from our review that should be considered by authorities in taking a strategic approach to managing demand within a defined service. The full range of information is set out in **Appendix 10**. This list is not exhaustive but does provide some clear principles to help shape management of demand.

**Exhibit 12 – Key considerations for local authorities in managing demand.**



Source: Wales Audit Office.

38 Guidance from April 2013 developed by Public Health Wales in partnership with the Welsh Government entitled Improving the Health and Well-being of Homeless and Specific Vulnerable Groups Standards, recognizes that leadership is critical in driving improved health outcomes for homeless and vulnerable groups.

# Appendices





# Appendix 1: Study methodology

## Review of literature

We have reviewed a wide range of documents and media, including:

- Welsh Government policy and guidance documents;
- local authority documents including application forms, advice leaflets, committee papers, plans and strategies; and
- research and evidence on homelessness services produced by a range of representative bodies including the Welsh Local Government Association, Shelter Cymru and Homeless Link.

## Data analysis

We have analysed the data collected from local authorities by the Welsh Government published on StatsWales covering local authority performance in respect of homelessness and local authority revenue expenditure on homelessness and housing advice services. The data drawn from individual returns from each authority in respect of homelessness performance has not been audited for accuracy. Revenue outturn data was audited and the information we present in this report on expenditure by local authorities on homelessness and housing advice services is different to the information published by StatsWales.

## Local authority fieldwork

We visited five local authorities in Wales in 2016-17. The local authorities selected represented a mix of authorities which are geographically spread across Wales and of different population sizes. These were:

- Bridgend County Borough Council
- Carmarthenshire County Council
- Denbighshire County Borough Council
- Merthyr Tydfil County Borough Council
- City of Swansea Council

During the visits, we interviewed a range of local authority staff, housing association staff, third sector organisations, members of public service boards and elected members.

## National fieldwork

We undertook a range of Interviews with key stakeholders and opinion formers including the Welsh Government; opinion formers and policy thinkers Shelter Cymru, the Wallach, Cymorth Cymru, the Equalities and Human Rights Commission, Welsh Local Government Association and University of Wales. We also held a focus group with the local authority homelessness network.

## Surveys

We commissioned a qualitative telephone survey of citizens to ascertain how they view local authorities, engage with, and use public services. This focussed on how well organisations prevent demand, and equip citizens to make the right choices to address or prevent their needs arising. The survey was completed between November 2016 and January 2017. 555 people living in all 22 local authorities in Wales completed the telephone survey and the survey was reported to the Wales Audit Office in March 2017. The exhibit below shows the purpose of the survey.

### Scope of the citizens' survey

To gather people's views about:

- the quality of services provided by local authorities;
- people's overall satisfaction with local authority services;
- the methods people use to contact their local authority;
- how people find out information about their local authority;
- the reasons why people had contacted their local authority in the previous 12 months;
- the effectiveness of local authority responses to people's requests for service and information;
- people's perceptions of changes to local authority services; and
- people's views on how local authorities should design and plan services in the future.

We had planned to conduct a specific survey of local authority managers on prevention and demand handling within homelessness services. Given the Welsh Government was also undertaking a survey of local authorities on implementation of the Housing (Wales) Act 2014 we did not progress with our survey to avoid duplication of activity. The Welsh Government provided us with their detailed findings and we have used this information in our review.

## Appendix 2: The different duties for how authorities manage homelessness in the countries of the United Kingdom

The countries of the United Kingdom have different statutory frameworks that set out authorities' duties to address homelessness. The focus on prevention in Wales is very different to other parts of the United Kingdom.

**The legislation that underpins how homelessness is addressed in Great Britain and Northern Ireland**

### England

The [Housing Act 1996](#) requires local authorities to assess what assistance they should provide to a homeless or potentially homeless person who presents to a local authority for assistance. The local authority assesses:

- whether the applicant is homeless;
- if so, whether the applicant made themselves homeless intentionally;
- if they were unintentionally homeless, if they have a local connection with the local authority to which they made the application; and
- whether the household is in a priority need category.

Only unintentionally homeless, priority need households are owed a main duty by their local authority to secure settled accommodation.

In 2018 this legislation will be replaced by the requirements of the [Homelessness Reduction Act 2017](#) which introduces a range of new duties on local authorities replicating many of the duties in the Housing (Wales) Act 2014 reforming the homelessness duties placed on local authorities to ensure that at-risk households receive better help quicker and homelessness is prevented where possible.

### Northern Ireland

Under the [Housing \(NI\) Order 1988](#), the Northern Ireland Housing Executive (NIHE) has the statutory responsibility for addressing homelessness.

These duties require the NIHE to assess those that present as homeless to determine whether they meet the four tests of – eligibility; homelessness; priority need; and intentionality.

Any household that meets these four tests is accepted as a 'Full Duty Applicant' and will be owed a full housing duty.



## Scotland

Part II of the [Housing \(Scotland\) Act 1987](#) (as amended by the 2001 and 2003 Acts) sets out the powers and duties of local authorities in dealing with applications from people who are homeless or threatened with homelessness.

Homeless/potentially homeless persons are required present to a local authority for assistance and the council assesses:

- whether the applicant is homeless;
- if they have a local connection with another authority in Scotland, England or Wales; and
- whether the applicant made themselves homeless intentionally.

Priority Need groups were abolished under the [Homeless \(Abolition of Priority Need Test\) \(Scotland\) Order 2012](#) in November 2012. From 31 December 2012 all unintentionally homeless households are entitled to settled accommodation.

## Wales

The [Housing \(Wales\) Act 2014](#) requires local authority to help everyone at risk of homelessness rather than just those in priority need groups and local authorities must:

- help anyone threatened with homelessness within next 56 days;
- provide help to homeless persons to help them secure a home; and
- focus on preventing homelessness in the first instance.

There are duties placed on Housing Associations and Social Services to co-operate with local authority housing services in carrying out their homelessness duties.

There is also a new power rather than a duty to apply the intentionality test and new powers for local authorities to discharge their homelessness duties through finding accommodation in the private rented sector.

Source: Wales Audit Office analysis of Homelessness Duties in each of the countries of the United Kingdom.

## Appendix 3: Expenditure on homelessness and housing advice services by local authority 2009-10 to 2015-16 in absolute (cash) and real terms

The amount spent by local authorities on homelessness and housing advice services in the last seven years

| Local Authority   | 2009-10<br>(£'000) | 2010-11<br>(£'000) | 2011-12<br>(£'000) | 2012-13<br>(£'000) |
|-------------------|--------------------|--------------------|--------------------|--------------------|
| Blaenau Gwent     | 419.504            | 519.68             | 434.584            | 377.883            |
| Bridgend          | 1,384.127          | 1,270.981          | 1,006.296          | 996.609            |
| Caerphilly        | 809.2              | 684                | 710                | 897.951            |
| Cardiff           | 8,053              | 7,121              | 5,616              | 3,999              |
| Carmarthenshire   | 2,670.556          | 1,473.219          | 1,715.154          | 2,079.044          |
| Ceredigion        | 806                | 887                | 737.647            | 729.202            |
| Conwy             | 2,295.85           | 2,101.72           | 1,928.592          | 1,723.948          |
| Denbighshire      | 866                | 828                | 747                | 822                |
| Flintshire        | 1,017              | 939                | 981                | 1,175.317          |
| Gwynedd           | 1,189              | 1,823.603          | 1,797.574          | 1,884.677          |
| Isle of Anglesey  | 932                | 1,588              | 1,125              | 1,106              |
| Merthyr Tydfil    | 361.008            | 344.515            | 264.3793           | 366.9204           |
| Monmouthshire     | 1,454              | 1,265.802          | 842.121            | 634.417            |
| Neath Port Talbot | 1,051              | 1,027.057          | 1,308              | 1,339.025          |
| Newport           | 1,928.757          | 1,833.022          | 1,963.46           | 2,230.607          |
| Pembrokeshire     | 1,154              | 805                | 572                | 578                |
| Powys             | 675.212            | 520.276            | 489.343            | 469.337            |
| Rhondda Cynon Taf | 920.687            | 882.147            | 877.302            | 959.352            |
| Swansea           | 1,114              | 6,188              | 807                | 823                |
| Torfaen           | 1,776              | 2,071              | 1,365              | 1,251              |
| Vale of Glamorgan | 792                | 831                | 979                | 954                |
| Wrexham           | 1,237.132          | 1,430.474          | 1,721.1            | 1,676.509          |
| TOTAL             | 32,906.03          | 36,434.5           | 27,987.55          | 27,073.8           |

The amount spent by local authorities on homelessness and housing advice services in the last seven years (continue)

| 2013-14<br>(£'000) | 2014-15<br>(£'000) | 2015-16<br>(£'000) | % Change (+/-) | Real terms %<br>change |
|--------------------|--------------------|--------------------|----------------|------------------------|
| 332.542            | 339.159            | 487.548            | 16.2           | 4.1                    |
| 1,060.892          | 1,089.952          | 1,090.439          | -21.2          | -29.4                  |
| 1,510.2            | 1,472.65           | 1,040              | 28.5           | 15.1                   |
| 2,474.864          | 2,131              | 2,106.182          | -73.8          | -76.6                  |
| 2,013.975          | 1,872.477          | 2,046.11           | -23.4          | -31.4                  |
| 647.5              | 776.869            | 900.877            | 4              | 0.1                    |
| 1,455.035          | 1,378.368          | 1,512.164          | -34.1          | -41                    |
| 787                | 957                | 1,221              | 41             | 26.3                   |
| 1,036.598          | 1,172.131          | 1,665.956          | 63.8           | 46.7                   |
| 1,632.314          | 1,593.154          | 1,607.482          | 45.6           | 21.1                   |
| 1,221              | 924                | 809                | -13.2          | -22.2                  |
| 409.065            | 483.101            | 603.349            | 67.1           | 49.7                   |
| 652.931            | 623.977            | 782.084            | -46.2          | -51.8                  |
| 1,555              | 1,138              | 1,284              | 22.2           | 9.4                    |
| 2,367.556          | 2,467.426          | 2,919.787          | 51.3           | 35.6                   |
| 558                | 507                | 594                | -48.5          | -53.9                  |
| 643.703            | 471                | 547                | -18.9          | -27.4                  |
| 1,283.147          | 1,201.254          | 1,055.039          | 14.6           | 2.6                    |
| 899                | 876                | 1,297              | 16.5           | 4.3                    |
| 1,156              | 992.1519           | 1,209.206          | -31.9          | -39                    |
| 501                | 725                | 1,016              | 28.3           | 14.9                   |
| 1,298.544          | 903.4013           | 1,267.68           | 2.5            | -8.2                   |
| 25,495.87          | 24,095.07          | 27,061.9           | -17.7          | -26.3                  |

## Appendix 4: SOCITM Better Connected Results for Welsh Local Authorities 2016-17

The SOCITM ratings for each local authority in Wales

| Council            | Better connected rating | Mobile standard | Accessibility |
|--------------------|-------------------------|-----------------|---------------|
| Flintshire         | 3                       | Pass            | Pass          |
| Wrexham            | 3                       | Pass            | Pass          |
| Powys              | 3                       | Pass            | Pass          |
| Neath Port Talbot  | 3                       | Pass            | Pass          |
| Cardiff            | 3                       | Pass            | Pass          |
| Rhondda Cynon Taff | 3                       | Pass            | Pass          |
| Torfaen            | 3                       | Pass            | Pass          |
| Newport            | 3                       | Pass            | Pass          |
| Denbighshire       | 3                       | Pass            | Fail          |
| Swansea            | 3                       | Pass            | Fail          |
| Caerphilly         | 3                       | Pass            | Fail          |
| Gwynedd            | 2                       | Pass            | Pass          |
| Pembrokeshire      | 2                       | Pass            | Pass          |
| Vale of Glamorgan  | 2                       | Pass            | Pass          |
| Merthyr Tydfil     | 2                       | Pass            | Pass          |
| Monmouthshire      | 2                       | Pass            | Fail          |
| Blaenau Gwent      | 2                       | Fail            | Fail          |
| Conwy              | 2                       | Fail            | Fail          |
| Isle of Anglesey   | 1                       | Fail            | Pass          |
| Carmarthenshire    | 1                       | Fail            | Pass          |
| Bridgend           | 1                       | Fail            | Pass          |
| Ceredigion         | 1                       | Fail            | Fail          |

Source: [SOCITM Better Connected](#).

# Appendix 5: Wales Audit Office assessment of information provided on council websites for homelessness, school transport and bulky waste collections 2016-17

We used a five point scale ranging from very poor to very good to rate the information across the following 13 aspects. The figures in this exhibit show the number of local authorities we rated as scoring very good or good across the 13 aspects

## Wales Audit Office assessment of number of authorities complying with the standard

| Key line of enquiry  | Homeless services | School transport | Bulky waste |
|--|-------------------|------------------|-------------|
| <b>Signposting</b> – Is content easy to find? Quality of search engine   | 17                | 21               | 21          |
| <b>Clarity</b> – Are instructions easy to understand?  | 20                | 19               | 21          |
| <b>Completeness</b> – Is all the information required by users available?  | 16                | 17               | 16          |
| <b>Timeliness</b> – Is the information up to date?   | 3                 | 9                | 5           |
| <b>Accessibility</b> – Is the information available in other languages, large font or alternative formats? Does it meet accessibility and quality standards? | 18                | 18               | 18          |
| <b>Support</b> – Can users contact/speak to the authority if need be?  | 17                | 12               | 19          |
| <b>Effectiveness</b> – Is the advice and information provided effective?   | 9                 | 10               | 12          |
| <b>What is provided</b> – Is it clear what the service can and cannot provide to users?  | 16                | 18               | 16          |
| <b>Problem solving</b> – Does the information provided result in a solution to users' problems?  | 14                | 18               | 19          |

**Wales Audit Office assessment of number of authorities complying with the standard**

| <b>Key line of enquiry</b>   | <b>Homeless services</b> | <b>School transport</b> | <b>Bulky waste</b> |
|--|--------------------------|-------------------------|--------------------|
| <b>Reducing demand</b> – Does the information provided/allow users to apply for a service without any recourse to the authority? | 9                        | 16                      | 16                 |
| <b>Appropriate links</b> – Does the information direct users to other providers?   | 15                       | 2                       | 18                 |
| <b>Application process</b> – Does the authority allow people to apply online for the service they are trying to access?          | 3                        | 16                      | 13                 |
| <b>Call handling</b> – Does the authority use a central call handling system?  | 19                       | 13                      | 17                 |

Source: Wales Audit Office, review of local authority websites.

## Appendix 6: The range of options used by local authorities and their partners to prevent an applicant from becoming homeless

Services provided to prevent an applicant from becoming homeless under Section 66 of the Housing (Wales) Act 2014

| Homelessness options  | Provided by local authorities |    | Provided by others |    | No provision | Increase in provision since 2014 Act |
|---|-------------------------------|----|--------------------|----|--------------|--------------------------------------|
|   | Yes                           | No | Yes                | No |              |                                      |
| Outreach  | 12                            | 10 | 18                 | 4  | 0            | 9                                    |
| Mediation   | 9                             | 13 | 19                 | 3  | 0            | 10                                   |
| Grant or loan   | 19                            | 3  | 9                  | 13 | 0            | 18                                   |
| Guarantees of payment   | 15                            | 7  | 4                  | 18 | 6            | 9                                    |
| Support managing debt/mortgage arrears                          | 18                            | 4  | 19                 | 3  | 0            | 15                                   |
| Security measures for applicants at risk of abuse               | 14                            | 8  | 18                 | 4  | 0            | 8                                    |
| Advocacy  | 7                             | 15 | 20                 | 2  | 1            | 7                                    |
| Other forms of tenancy support                                  | 16                            | 6  | 19                 | 3  | 0            | 13                                   |
| Accommodation   | 17                            | 5  | 19                 | 3  | 1            | 14                                   |
| Programmes to increase availability of affordable accommodation | 15                            | 7  | 12                 | 10 | 2            | 10                                   |
| Social housing lettings schemes                                 | 14                            | 8  | 14                 | 8  | 3            | 9                                    |
| Information and advice  | 22                            | 0  | 17                 | 5  | 0            | 14                                   |

Services provided to an applicant under Section 73 of the Housing (Wales) Act 2014 (Interim duty to secure accommodation for homeless applicants in priority need)

| Homelessness options  | Provided by local authorities |    | Provided by others |    | No provision | Increase in provision since 2014 Act |
|---|-------------------------------|----|--------------------|----|--------------|--------------------------------------|
|   | Yes                           | No | Yes                | No |              |                                      |
| Outreach  | 10                            | 12 | 19                 | 3  | 0            | 8                                    |
| Mediation   | 9                             | 13 | 19                 | 3  | 1            | 5                                    |
| Grant or loan   | 20                            | 2  | 6                  | 16 | 2            | 9                                    |
| Guarantees of payment   | 14                            | 8  | 4                  | 18 | 8            | 7                                    |
| Support managing debt/mortgage arrears                          | 14                            | 8  | 15                 | 7  | 2            | 11                                   |
| Security measures for applicants at risk of abuse               | 11                            | 11 | 16                 | 6  | 2            | 6                                    |
| Advocacy  | 6                             | 16 | 19                 | 3  | 2            | 5                                    |
| Other forms of tenancy support                                  | 13                            | 9  | 17                 | 5  | 0            | 7                                    |
| Accommodation   | 14                            | 8  | 18                 | 4  | 1            | 11                                   |
| Programmes to increase availability of affordable accommodation | 15                            | 7  | 10                 | 12 | 2            | 7                                    |
| Social housing lettings schemes                                 | 11                            | 11 | 13                 | 9  | 3            | 6                                    |
| Information and advice  | 21                            | 1  | 12                 | 10 | 1            | 10                                   |

Source: Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report, 8 August 2017, Welsh Government. These figures are derived from the local authority and 'others' responses.



## Appendix 7: Main reason for being threatened with homelessness in all Welsh local authorities in 2015-16 and 2016-17 and the change in performance

### The main reasons people are threatened with homelessness in Wales

| Reasons threatened with homelessness   | 2015-16      | 2016-17      | % change     |
|--|--------------|--------------|--------------|
| Loss of rented or tied accommodation   | 2,481        | 3,345        | 34.8%        |
| Parent no longer willing or able to accommodate  | 1,011        | 1,317        | 30.3%        |
| Breakdown of relationship with partner   | 960          | 1,137        | 18.4%        |
| Rent arrears   | 681          | 924          | 35.7%        |
| Other relatives or friends no longer willing or able to accommodate                        | 657          | 870          | 32.4%        |
| Current property unsuitable  | 321          | 348          | 8.4%         |
| Other (including homeless in emergency, returned from abroad, sleeping rough or in hostel) | 213          | 336          | 57.5%        |
| Current property unaffordable  | 213          | 249          | 16.9%        |
| In institution or care (eg hospital, residential home, army etc.)                          | 246          | 234          | -4.9%        |
| Mortgage arrears (repossession or other loss of home)                                      | 138          | 192          | 39.1%        |
| Prison leaver  | 99           | 159          | 60.6%        |
| Violence and harassment  | 108          | 93           | -13.9%       |
| <b>TOTAL</b>   | <b>7,128</b> | <b>9,210</b> | <b>29.2%</b> |

Source: HOUS0430, households found to be threatened with homelessness during the year. Main reason for being threatened with homelessness by type of household (Section 66), annual return to StatsWales.

## Appendix 8: Households accommodated temporarily in all Welsh local authorities by accommodation type and quarter in 2015-16 and 2016-17

The range of temporary accommodation provided to homeless people by local authorities in the last two years

| Temporary accommodation used by local authorities | April – June 2015 | July – September 2015 | October – December 2015 | January – March 2016 | April – June 2016 | July – September 2016 | October – December 2016 | January – March 2017 | % Change over period |
|---|-------------------|-----------------------|-------------------------|----------------------|-------------------|-----------------------|-------------------------|----------------------|----------------------|
| Private sector accommodation                      | 729               | 738                   | 726                     | 801                  | 786               | 807                   | 837                     | 786                  | 7.8%                 |
| Public sector accommodation                       | 435               | 417                   | 396                     | 411                  | 393               | 393                   | 453                     | 432                  | -0.7%                |
| Hostels and women's refuges                       | 426               | 459                   | 432                     | 498                  | 534               | 501                   | 474                     | 549                  | 28.9%                |
| Bed and breakfast                                 | 168               | 156                   | 132                     | 108                  | 135               | 138                   | 153                     | 189                  | 12.5%                |
| Homeless at home                                  | 81                | 111                   | 90                      | 60                   | 72                | 81                    | 36                      | 54                   | -33.3%               |
| Other   | 33                | 0                     | 3                       | 0                    | 9                 | 3                     | 0                       | 3                    | -90.9%               |
| Total accommodated end of quarter                 | 1,872             | 1,881                 | 1,779                   | 1,875                | 1,926             | 1,923                 | 1,953                   | 2,013                | 7.5%                 |

Source: HOUS0420, households accommodated temporarily by accommodation type and household type, quarterly data returns to StatsWales.

# Appendix 9: Examples of strategic approaches to preventing and managing demand

## Good practice examples in how organisations are addressing and managing demand

### South Northamptonshire Council

South Northamptonshire Council Prevention and Demand Strategy for adult and social care services includes an analysis of why projects fail and a strong focus on self-directed support. An Early Help and Prevention Commissioning Strategy is now in place to provide the platform for re-commissioning services. This is informed by an Early Help Needs Analysis.

### Scottish Fire and Rescue Service

The Scottish Fire and Rescue Service recognises that by effectively collaborating with its partners on shared priorities it will reduce the risk to communities and, in turn, reduce the demand on other key public services such as NHS Scotland, Police Scotland and social services. Their local fire and rescue plans set out how demand reduction should, through time, contribute to the ability of partners to reduce their own spend allowing them to focus their resources on other priorities.

### The Edinburgh Partnership

In 2014, consultation was undertaken across the Edinburgh Partnership to help identify perceived 'wicked' or intractable issues, which need increased joint effort to support a successful shift to prevention. An important finding is that interventions are often at the individual level, and whilst there may be enough resources to intervene the public service response is often badly co-ordinated, too slow, and interventions are based on intuition and technocratic judgement rather than solid evaluation and factual understanding of what works. The Edinburgh Partnership's Prevention Strategic Plan 2015-18 sets out its response to the consultation findings. Efforts has been prioritised into nine key Prevention Exemplars and represents a more realistic, affordable and achievable plan. Actions include a much stronger approach to whole household and family support. Building community resilience and community capacity takes a high priority and includes mapping organisation's capabilities including who does what and strengthening networks in neighbourhoods.

### **Managing demand in National Park Authorities**

National Park Authorities have a track record of planning aspects of their activity over the longer-term. Examples include Pembrokeshire Coast National Park Authority's Management Plan 2015-19, which sets out a vision for the area in 2050, and this long term plan guides the authority's approach to ecosystems within the Park. The UK National Parks and Wellbeing Forum is a network of practitioners, managers, planners and researchers involved with promoting the long-term value of the environment and nature conservation for wellbeing. One of its tasks is to understand how best to encourage sustainable tourism and prevent the more damaging aspects of visiting the parks.

### **Humberside Police**

Humberside Police include Strategic Demand Management as one of its core themes for action in its current policing and crime plan. This builds on work developed from its Early Intervention Strategy. Humberside Police recently reviewed the different ways of classifying the types of demand it faces and alongside partners it prioritized the responses to different types of demand. As a result of close collaboration, strategic demand management has been integrated into the Organisational Development aspects of Humberside Fire and Rescue Service's corporate plans.

### **Calderdale Council**

Calderdale Council's demand management framework has three priorities: sharing and integrating services including getting others to share the load; nudging and influencing a change in behaviour; and managing expectations by creating a more balanced relationship between the council and people in Calderdale. Successes include reducing the number of car journeys and traffic congestion by integrating transport solutions such as linking local bus timetables to train times. Demand for car parking is reducing by improving car share, integrating cycle lanes with highways schemes, and working with the private sector to offer more choice and less reliance on council school transport.

## Population Needs Assessments

The Social Services and Wellbeing Act (Wales) 2014 requires local authorities and their health board partners to produce an assessment of the care and support of their resident populations. The assessments will aid local authorities and health boards to better understand their population and how it might change over the coming years to help them provide better public services. The Welsh Government requires a number of specific areas of service provision to be included in the assessment, including homelessness.

The North Wales population needs assessment section on homelessness identifies four areas where gaps in service or support currently exist:

- Lack of single person accommodation
- Limited hostel provision
- Shortage of specialist provision
- Gaps in support services

The assessment also identifies that local authorities face challenges through changes to the welfare benefits, the full extent of which are yet to be made. Local authorities and the health board also need to ensure that there is effective integration of third sector support services with statutory services to meet increasing demand. The assessment identifies a risk to the continued progress in addressing homelessness through the loss of Welsh Government transitional funding.

# Appendix 10: Key considerations for local authorities in managing demand

| Key aspects of managing demand  | Characteristics of good demand management  | We are good at this | We need to improve this | We do not do this |
|---|--|---------------------|-------------------------|-------------------|
| We know what we must do   | We know what our legal obligations are.  |                     |                         |                   |
|   | We know what citizens want and how our services should be provided to them.  |                     |                         |                   |
|   | We know what services are currently provided by us and our relevant partners.  |                     |                         |                   |
|   | We know where services are provided from including those of relevant partners.   |                     |                         |                   |
| Our services are organised to do what we need to do quickly and efficiently | We offer a range of options for citizens to contact us to get the help they need – office, telephone, social media and online.   |                     |                         |                   |
|   | Changes to services are piloted and evaluated before they are implemented to ensure they are right for our citizens.   |                     |                         |                   |
|   | Our management processes are designed to avoid system failure, for example we do not seek to cancel applications, we keep waiting times to a minimum and we do not delay responding to citizens. |                     |                         |                   |
|   | We have organised services to resolve issues quickly and at the first point of contact.  |                     |                         |                   |
|   | We have designed services to avoid unintentionally creating demand and reinforcing dependency.   |                     |                         |                   |
















| Key aspects of managing demand  | Characteristics of good demand management  | We are good at this | We need to improve this | We do not do this |
|---|--|---------------------|-------------------------|-------------------|
| Our services are organised to do what we need to do quickly and efficiently | We do not gate keep access to services and ensure our services are accessible to all service users.  |                     |                         |                   |
|   | We have effective triage approaches to ensure that those in greatest need get help as quickly as possible and alternative responses to those with lower needs. |                     |                         |                   |
|   | We have clear and concise application processes.   |                     |                         |                   |
|   | Citizens apply to us once for a service – our application and assessment processes are not duplicated elsewhere within the authority or by our partners.       |                     |                         |                   |
|   | We have short end-to-end application processes (from requesting to receiving a service) with few approval stages.  |                     |                         |                   |
|   | We respond quickly and effectively to queries and requests when citizens first get in touch.   |                     |                         |                   |
|   | We make the right decision quickly when reviewing and approving service requests.  |                     |                         |                   |
|   | We can shift resources to manage demand early and downstream to improve our prevention work when we need to.   |                     |                         |                   |

| Key aspects of managing demand                                   | Characteristics of good demand management  | We are good at this | We need to improve this | We do not do this |
|--|--|---------------------|-------------------------|-------------------|
| Citizens know what they are entitled to and where to go for help | We provide citizens with good quality and accessible information through a wide range of appropriate channels.   |                     |                         |                   |
|  | We have clearly set out what citizens are entitled to.   |                     |                         |                   |
|  | We tell citizens what we can and cannot do.  |                     |                         |                   |
|  | We set out all the relevant information citizens need at first point of contact.   |                     |                         |                   |
|  | We provide citizens with all the information and support they need to find their own solution to the problems they have.   |                     |                         |                   |
|  | We use plain accessible language in our written materials.   |                     |                         |                   |
|  | We have tested that our written information is well understood by users, including those that may be anxious or uncertain about their future.                        |                     |                         |                   |
|  | We are clear about the service users' role in application and assessment processes and we have told them how they can help the process go more smoothly and quickly. |                     |                         |                   |
|  | Our written material is produced collaboratively with subject experts and includes the involvement of people who use the service(s).                                 |                     |                         |                   |



| Key aspects of managing demand                                   | Characteristics of good demand management  | We are good at this | We need to improve this | We do not do this |
|--|--|---------------------|-------------------------|-------------------|
| Citizens know what they are entitled to and where to go for help | Appeals and complaints processes are based on fairness and equity for all involved and are well set out and accessible and available to all. |                     |                         |                   |
|  | We test how we engage with and provide services with citizens and use feedback to improve how we inform, engage and involve service users.   |                     |                         |                   |
|  | Citizens do not need to chase us up to get a response.   |                     |                         |                   |
| We work well and collaborate with others                         | We have agreed with partners what our expectations of them are and what they are required to do.   |                     |                         |                   |
|  | Our partners are clear on their role.  |                     |                         |                   |
|  | We have agreed data and information sharing protocols with partners.   |                     |                         |                   |
|  | Data and information sharing protocols are working effectively.  |                     |                         |                   |
|  | We integrate our digital services with partners to improve accessibility and increase usage.   |                     |                         |                   |
|  | We have joint referral, application and assessment procedures and systems with our partners.   |                     |                         |                   |
|  | We co-locate services with partners when and where needed.   |                     |                         |                   |

| Key aspects of managing demand               | Characteristics of good demand management   | We are good at this | We need to improve this | We do not do this |
|--|---|---------------------|-------------------------|-------------------|
| We work well and collaborate with others     | We know that citizens who need help are getting a service from us and/or our partners.                    |                     |                         |                   |
|  | We effectively direct service users to other organisations who are better placed to solve their problems. |                     |                         |                   |
| We know services are making the right impact | We collect and analyse the right data to enable us to identify where we need to invest our resources.     |                     |                         |                   |
|  | We collect and analyse the right data to design services that best meet people's needs.                   |                     |                         |                   |
|  | Our data accuracy is good.  |                     |                         |                   |
|  | Our data covers the work of both the authority and our partners.  |                     |                         |                   |
|  | We collect and use information in real time.  |                     |                         |                   |
|  | We are able to demonstrate equal access to services for all citizens.                                     |                     |                         |                   |
|  | We benchmark our performance with other organisations to judge our performance and impact.                |                     |                         |                   |
|  | We know what we need to change to improve our service.  |                     |                         |                   |

| Key aspects of managing demand   | Characteristics of good demand management                                     | We are good at this   | We need to improve this  | We do not do this  |
|--|---|---|--|--|
| We know what we need to change and have agreed joint priorities to achieve improvement | We have involved and agreed our priorities with our partners.                 |   |   |   |
|  | We have involved service users in agreeing what and where we need to improve. |   |   |   |
|  | Our planned solutions take a long-term view.                                  |   |   |   |
|  | We identify sustainable solutions.  |   |   |   |
|  | We are focussing on improving how we prevent demand.                          |  |  |  |



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