



Report for:	Housing and Communities Overview and Scrutiny Committee
Date of meeting:	3 July 2019
Part:	1
If Part II, reason:	

Title of report:	Homeless Reduction Act Update
Contact:	Councillor Margaret Griffiths, Portfolio Holder for Housing Carly Thomas, Independent Reviewing Officer Cynthia Hayford, Homeless Prevention Team Leader
Purpose of report:	1. To provide members with an overview of the implementation of the Homelessness Reduction Act and a progress update one year on.
Recommendations	1. For members to gain a full insight into the ongoing developments in this area and offer comments.
Period for post policy/project review	Performance against the Homeless Reduction Act 2017, will continue to be reviewed in accordance with Homelessness Strategy monitoring and delivery, reports will be submitted to members on an annual basis.
Corporate objectives:	
Implications:	Failure to implement and develop new working practices in line with the Homelessness Reduction Act would mean the Council were in breach of fulfilling its statutory requirements.
'Value for money' implications	The service will continue to work closely with the support team at Ministries for Housing Communities and Local Government (MHCLG), to ensure that we effectively use grant funding allocations and deliver prevention services to the local community.
Risk implications	N/A
Community Impact Assessment	N/A
Health and safety Implications	N/A
Consultees:	Natasha Beresford, Strategic Housing Group Manager Fiona Williamson, Assistant Director Housing Mark Gaynor, Corporate Director of Housing and Regeneration

Background papers:	<p>Appendix 1 Personalised Housing Plan</p> <p>Appendix 2 NSNO Policy</p> <p>Appendix 3 Cold Weather Funding Overview</p> <p>Appendix 4 Private Sector Team Progress Overview</p> <p>Appendix 5 Homelessness Strategy Update</p>
Glossary of acronyms and any other abbreviation in the report:	<p>Homeless Reduction Act (HRA)</p> <p>National Practitioners Support Service (NPSS)</p> <p>Personal Housing Plans (PHP)</p> <p>Ministries for Housing Communities and Local Government (MHCLG),</p> <p>Housing and Communities Overview & Scrutiny (H&OSC)</p> <p>Homelessness Advice and Support Team (HAST)</p> <p>Housing Senior Management Team (HSMT)</p> <p>Homeless Action Review Team (HART)</p> <p>Discretionary Housing Payment (DHP)</p> <p>Clinical Commissioning Group (CCG)</p>

1. Introduction

- 1.1. From an early stage, the Strategic Housing Service was tracking media in relation to the much-anticipated introduction of the Homeless Reduction Act (HRA).
- 1.2. The Strategic Housing Service had been proactive in its approach to preparation for the Act, whilst working closely with partners and the National Practitioners Support Service (NPSS) to develop an excellent housing advice and homeless prevention service. This was recognised with the award of the NPSS Gold Standard award for Housing Options in July 2018.
- 1.3. Many identified areas of good practice, such as the development of Personalised Housing Plans (PHP) were implemented in advance of the HRA implementation in April 2018. This enabled Officers to gain increased confidence in the new legislative approach and for the service to make adjustments ahead of the new act coming into effect.

2. Implementation

- 2.1. In summer of 2017, the service presented proposals to Housing and Communities Overview & Scrutiny (H&OSC) and Cabinet Committees

outlining proposals that it intended to deliver to aid implementation of HRA. One of the key proposals was to implement a designated Project Lead, a proactive stance, which was approved by Members.

2.2. Staffing

Prior to the implementation of HRA the Homeless Prevention and Assessment team's staffing complement consisted of the Team Leader, Lead Officer, 2 x Temporary Accommodation Officers and 4 Homeless Prevention & Assessment Officers.

As part of the report approved by H&OSC and Cabinet committees, there were additional staff proposed to ensure the service could deliver the new functions required by the legislation. Recruitment was undertaken to resource the team with the following additional Officers;

- *1x Triage Officer
- *1x additional Temporary Accommodation Officer
- *1x Temporary Accommodation Lead Officer
- *1x additional Homeless Prevention Officer
- *1x Independent Reviewing Officer

2.3. Triage and Service redesign

Every case (aside from the emergency same-day homeless approaches) goes through this process. Triage assessment is undertaken when a client presents to the Customer Service Unit, they are assessed and initial advice is given in relation to their situation. Clients are then referred to the Homeless Prevention and Assessment Team and allocated an officer. This change in process has;

- Reduced the initial interview time periods for the Officers, enabling a more focussed conversation with the client.
- Officers are able to read the comprehensive notes on the file before meeting with the client, which means when they meet with the client to complete the Personalised Housing Plan (PHP) the majority of the initial interview can be focused on this and the client's needs, rather than trying to gather information and complete the PHP simultaneously.
- Helped to stem the flow of referrals through to the officers. Previously the officers would have had to provide advice on all cases referred through and triage them but now they are only working with clients that are homeless or threatened with homelessness and require intervention. The Triage Officer is able to offer appropriate advice and interventions to clients who are able to 'self-serve' and will also issue any not homeless or eligible decisions if and when appropriate.
- As there has been a significant increase in administration of cases this has helped Officers to manage this and minimise increase in workloads for the officers as much as possible.
- Enables officers to focus their time on clients requiring necessary advice and interventions to prevent homelessness.

2.4. Online Personal Housing Plans (PHP)

These documents have been digitalised and are built into the Civica system, this is the system used by Officers to manage their casework. This process is unique to other local authorities in Hertfordshire and was developed by the Project Lead with the system provider. This enables us to be more efficient as the PHP is auto populated by the casework tasks that officers go through with clients during the initial interview. The process allows for tasks to be assigned to the applicant, which are visible to them when they log into their application page on the Moving with Dacorum website. This enables applicants to complete their tasks and also send comments to the back office through this portal, therefore creating a more interactive experience between the Officer and applicant. **See Appendix 1.**

2.5. H-Clic Reporting

One of the requirements upon local authorities following the implementation of the HRA was to complete quarterly data returns to central government via a new system called 'H-Clic' which has replaced the previous P1E reporting system.

This new system allows local authorities to further drill down into data meaning that since implementation we have been able to analyse all approaches to identify figures, which enables us to identify trends and address issues.

Since implementation last year, we have identified the following:

- Approximately 40% of all approaches are made when the applicant is already homeless (known as relief cases).
- A further 48% of all approaches are made when the applicant is threatened with homelessness (known as prevention cases).
- Applicants that were not threatened with homelessness, and requiring basic advice and assistance in relation to their housing situation made 10% of all approaches.
- 60% of all households that have approached the council are single with no dependents.
- Of the above 60% a high proportion (about 80%) have an identified vulnerability or need such as mental health and/or drug and alcohol use. However, this does not necessarily translate to there being a priority need for homelessness assistance or temporary accommodation.

3. Key challenges and what we have done are doing to address them

3.1. Although every effort has been made to ensure minimal impact to service following implementation we have had some challenges that the officers have had to get used to.

Dacorum, unlike many other local authorities did not require a big culture change following the implementation of the HRA. Officers were already completing PHP's in advance of implementation and accommodating homeless applicants at the end of a s.21 notice, rather than requesting a Bailiffs Warrant for eviction and giving advice to 'single non-priority' clients. Previously approaches were allocated to two separate teams and the Housing Needs Team would deal with the single non-priority group. Our Housing Needs who work within the Pre-Tenancy Team and deal primarily with the Housing Register, previously would provide advice to all 'single non-priority' applicants and refer any clients that needed intervention or further investigation. Following the implementation of the HRA the Homeless Prevention and Assessment Team deals with every approach. As a result there has been an increase in caseload for staff as they now see all approaches that come through.

There has also been a significant increase in the administration of cases. Officers are now seeing more people based on the changes above, each of which requires them going through potentially three stages, with PHP's that need updating and duty letters that must be issued through every stage of the HRA process, this is a requirement of the Act. This is in addition to case notes, agency referrals, reports and any other prevention or relief work they are required to do. In order to ensure that this process can be as efficient as possible, template letters have been built into the system. An Officer under the new legislation can have a case for approximately 6 months or more as opposed to about 3 months prior to implementation.

Throughout the planning and implementation process there were issues with the Civica system, we regularly reported a number of 'bugs' and errors in the new system. Given it was a new module it is not unexpected for there to be such issues but this provided a challenge for management team and users, which impacted on the transition. Additionally there were issues with the service from our system provider in general, however we have now met with them to discuss these issues, these have now been resolved and we have a greater working relationship with them as a result.

3.2. Length of time in Temporary Accommodation

Due to the increase in stages of a homeless application under the new requirements, this has meant that applicants are on average spending longer in temporary accommodation. Before HRA on average, an applicant could be in temporary accommodation for approximately two and half months until they are housed but post HRA the average length of stay in temporary accommodation is on average six months.

Prior to the implementation of the HRA, officers were required to work through the more traditional investigative process, which was less onerous and a conclusion was reached more quickly (typically within 33 days). Following implementation applicants are placed into temporary accommodation for 56 days before a decision can be made. Relief efforts are made during this time but if these attempts are unsuccessful, applicants will remain in temporary accommodation until a conclusion is reached on their case. This is affecting the level of temporary accommodation stock available and the statistics for move on. It is not an increase in approaches but rather the same level, without the applicants moving on at the same pace, which additionally impacts caseloads.

In order to combat this, Temporary Accommodation provision has been increased, we have taken on more leased properties via the council's Estates Department and are using general needs properties to accommodate applicants, in addition to purpose built hostel units. The Development team are also in the process of developing two new sites for temporary accommodation.

3.3. Lack of suitable Private Rented Sector (PRS) offer

One of the main challenges is around the lack of suitable PRS properties that are available for the team to discharge duty into. This can make relief efforts difficult for the Homeless Prevention & Assessment Officers. Without an effective offer, all applicants owed a duty by the council are being placed into social housing, further increasing pressures on stock and resources. This was raised up by Homeless Advice and Support Team (HAST) during their visit and included in their feedback.

The lack of properties available is due to several factors including competition from other authorities including Brent and St Albans who currently offer larger incentives/packages to landlords.

As Dacorum currently only offers the Homeless Prevention Fund, we are not in a position to compete. To solve this problem, as outlined above, a briefing paper detailing the need for a PRS offer has been developed by HART and now been provisionally approved by Housing Senior Management Team (HSMT). An action group has now been set up to look at this in more detail and explore recommendations by HSMT. Once this piece of work is completed it will go through the management approval processes.

- 3.4. Some cases have gone over their 56-day target at the Relief and Prevention stages. This could be because of the various compulsory tasks that need to be carried out in the Homeless application process. For example, each stage of the homeless application process requires Officers to issue letters before they can move on to the next stage. Initially the system did not notify Officers when the deadline was reached for this task, due to the complexity of casework, this mean that some tasks could be delayed. This issue has now been addressed and Officers do get alerts to notify them of the end of each stage.

4. Initiatives

4.1. Housing First and Outreach Service Provision

Following a joint bid with St Albans Council, led by Dacorum, Ministries for Housing Communities and Local Government (MHCLG) have announced our success in securing £200,000 funding from the governments Rough Sleeping Initiative fund to develop a Housing First Project across the two districts.

This funding, will crucially enable Dacorum to recruit 2x dedicated Rough Sleeping Outreach workers, who are vital to tackling rough sleeping, street activity and combating entrenched homelessness.

This project will focus on providing accommodation to those individuals with complex and multiple needs for whom the standard processes and frameworks do not work. Dedicated outreach workers will work closely with a

project lead to ensure that intensive support for the clients is provided within secure accommodation. As the funding has only recently been announced, we are still in early discussions with partners to develop the overall implementation plan, which will include proposals to ensure that the project is sustainable, past the 1-year funding.

Additionally the service has other funding available, which will enable us to compliment this project by recruiting a dedicated drug and alcohol worker to address the needs of homeless clients working closely with the outreach team.

4.2. Mental Health Working Group

In recent months, Officers from across the service are increasingly dealing with clients, presenting with complex needs. This has presented a number of significant challenges, including non-engagement, violent and aggressive behaviour, increasing challenges with managing staff safety and safeguarding issues. This has been raised as a key challenge at our Homeless Forum, who with Member and partner agency support have established a Mental Health working group, with input from the Clinical Commissioning Group (CCG).

Initially meeting was held with the Director of Commissioning for Mental Health services to address these issues and subsequent meetings are now attended by the CCG commissioning manager, who has an active role in contributing to and shaping the contract for Mental Health services. This has meant the service have been able to submit requirements that the health services have to abide by which include engaging with local services on an operational and strategic level and adopting a more flexible approach to complex needs cases. These requirements have enabled us to influence commissioning contract documents, to assist with improved engagement and outcomes.

4.3. Homeless Prevention Fund

Our Homeless Prevention Fund, previously primarily used for paying deposits on privately rented properties to assist applicants into PRS accommodation and prevent homelessness, can now also be used to cover Rent in Advance. However as explained above, this has only been successful in a small number of cases. This year we have had about 12 successful applications for support with deposits and sometimes rent in advance. The Homeless Prevention Fund have also been used to fund the extra staff needed, grant funding for partner organisations, training and in some cases paid legal fees for applicants.

We have also developed a closer working relationship with Housing Benefit, which has meant that management are able to pre-approve Discretionary Housing Payments (DHP). This has meant we can expedite these payments more quickly, helping more clients to access the PRS.

On occasion, DHP can also be used to pay off arrears, this is not done as a matter of course but in certain cases, with management approval, this can also be considered as a prevention method. In order for this to be to be

agreed there has to be evidence that this will prevent homelessness for six months or more.

4.4. HART

We have created and developed a sub group of our Homeless Forum, referred to as Homeless Action Review Team (HART). We have used this group to undertake an interim review of our Homelessness Strategy and ensure all commitments are being met, in addition to the service demonstrating HRA compliance. This group report to the Housing Senior Management Team on a quarterly basis key updates and developments. The group consists of members from across the Housing Service and external partners, they have worked together to develop briefing papers and proposals to Housing Senior Management Team and external bodies such as MHCLG, such as our approach to a Dacorum Housing First model.

This group regularly reports back into our Homeless Forum so that all of our partner agencies are kept up to date with the progress of the work we are undertaking and are invited to be involved where relevant.

4.5. Pathways

As a part of the implementation project, we were required to create pathways for vulnerable client groups. Pathway plans are in place for ex-armed forces personnel, care leavers and ex-offenders. We are continuing to develop and build on these. Our prison leaver pathway has now been extended across two prisons, HMP The Mount and Peterborough, whilst the Mount is based within Dacorum, a majority of releases to this borough are from HMP Peterborough. Additionally service representatives are members of the Hertfordshire Criminal Justice Board Early Intervention & Rehabilitation group. This group are working with a range of partners to ensure that all ex-offenders have effective pathway arrangements back into suitable housing and tools are in place to prevent re-offending. We are currently further developing information that will update our website for vulnerable client groups to ensure that they understand services available to them.

Dacorum is also part of a working group that is reviewing the Joint Housing Protocol, which exists between Hertfordshire local authorities and Social Services, to provide a joined up process and pathway arrangements for 16/17 year olds, care leavers and Intentionally Homeless families.

4.6. Hertfordshire Local Connection Protocol

Dacorum has led on implementation of this, the protocol is between each of the ten districts who have signed up to agree a procedure to deal with cases where the applicant has approached one of the districts but has a connection to one of the others. By agreeing a consistent approach, it has led to easier transition processes for these applicants and better joint working between the authorities.

4.7. Formal offer to resolve

This is a formal written offer given to the parents/family looking to exclude potential homeless applicants. It is a formal agreement between them and the council that confirms we will help resolve the applicants homelessness if

they will agree to allow them to remain on a temporary basis – thus reducing the numbers in temporary accommodation.

5. Reviews

- 5.1. The HRA introduced additional areas that the applicant could challenge the local authority on. This includes the ability for applicants to review every step of their journey including their PHP and the decision to end the Prevention or Relief Stage to progress the application.
- 5.2. Although we have had a substantial amount of reviews coming through since implementation, there have been no challenges on these new reviews available since implementation.
- 5.3. Since the implementation of the HRA there has been a total of 34 reviews received.

Under the Housing Act 1996, if an applicant does not agree with the decision the Council has made on their homeless application they have the right to request a review of it. The type of reviews that come through vary in nature between reviews of Intentionally Homeless and Non Priority decisions, where the Council is stating they no longer owe the applicant a full duty to house them, to reviews of the suitability of accommodation offered and suspension from the housing register.

Around 29% of reviews have been in relation to Part 6 of the Housing Act (the Housing Register and Allocations) and just over 70% of reviews relate to Part 7 of the Housing Act (Homelessness).

When looking at the reviews that come under Part 7, 33% of them are Non-Priority Need decisions and 16% are Intentionally Homeless decisions.

Suitability review, which is where an applicant can challenge that they do not believe a property, offered to them is suitable for their needs – make up 32% of all reviews.

In terms of outcomes of the reviews received;

27% of original Officer decisions have been upheld
20% returned for further investigation
14% closed down where the applicant withdrew the review
17% decisions overturned
8% other (for example the case was taken to Housing Panel instead of a review etc.)

So far, three cases have appealed decisions that were upheld in the applicants favour at review.

6. Conclusion

Since implementation Dacorum has been in regular contact and had visits from our HAST team within the MHCLG. It is their role to ascertain the progress of local authorities in complying with the HRA.

The feedback we have received from these visits has been very positive; the service has been given vital feedback to enable us to continue to improve service delivery.

Implementation of the HRA has had an undeniable impact on the team and service, however through a proactive approach and continuing service development Dacorum is able to ensure that we are not only compliant with legislation but are also at the forefront of new initiatives and good practice.

For members to offer comments on the HRA update.