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**Gareth Owens LL.B Barrister/Bargyfreithiwr** Chief Officer (Governance) Prif Swyddog (Llywodraethu)



Contact Officer: Ceri Shotton 01352 702305 ceri.shotton@flintshire.gov.uk

To: Cllr Marion Bateman (Chair)

Councillors: Pam Banks, Gillian Brockley, Helen Brown, Tina Claydon, Geoff Collett, Rob Davies, Rosetta Dolphin, David Evans, Ted Palmer, Kevin Rush and Dale Selvester

3 October 2024

Dear Sir/Madam

#### NOTICE OF HYBRID MEETING COMMUNITY & HOUSING OVERVIEW & SCRUTINY COMMITTEE WEDNESDAY, 9TH OCTOBER, 2024 at 10.00 AM

Yours faithfully

Steven Goodrum Democratic Services Manager

Please note: Attendance at this meeting is either in person in the Delyn Committee Room, Flintshire County Council, County Hall, Mold, Flintshire or on a virtual basis.

The meeting will be live streamed onto the Council's website. The live streaming will stop when any confidential items are considered. A recording of the meeting will also be available, shortly after the meeting at <a href="https://flintshire.public-i.tv/core/portal/home">https://flintshire.public-i.tv/core/portal/home</a>

If you have any queries regarding this, please contact a member of the Democratic Services Team on 01352 702345.

#### AGENDA

#### 1 APOLOGIES

**Purpose:** To receive any apologies.

#### 2 DECLARATIONS OF INTEREST (INCLUDING WHIPPING DECLARATIONS)

**Purpose:** To receive any Declarations and advise Members accordingly.

#### 3 <u>MINUTES</u> (Pages 3 - 6)

**Purpose:** To confirm as a correct record the minutes of the meeting held on 11 September, 2024.

#### 4 **FORWARD WORK PROGRAMME AND ACTION TRACKING** (Pages 7 - 18)

Report of Overview & Scrutiny Facilitator

**Purpose:** To consider the Forward Work Programme of the Community & Housing Overview & Scrutiny Committee and to inform the Committee of progress against actions from previous meetings.

#### 5 **INDEPENDENT REVIEW OF HOMELESSNESS** (Pages 19 - 94)

Report of Chief Officer (Housing and Communities) - Cabinet Member for Housing

**Purpose:** To provide an update on the findings and recommendations following an independent review of the Council's homelessness services.

#### 6 **VOID MANAGEMENT** (Pages 95 - 96)

Report of Chief Officer (Housing and Communities) - Cabinet Member for Housing

**Purpose:** To provide an update on the number of Void properties and the work undertaken to bring in properties back into use.

# Please note that there may be a 10 minute adjournment of this meeting if it lasts longer than two hours

#### **COMMUNITY & HOUSING OVERVIEW & SCRUTINY COMMITTEE**

#### 11<sup>th</sup> SEPTEMBER 2024

Minutes of the Community & Housing Overview & Scrutiny Committee of Flintshire County Council held as a hybrid meeting on Wednesday 11<sup>th</sup> September 2024

#### PRESENT: Councillor Marion Bateman (Chair)

- Councillors: Gillian Brockley, Tina Claydon, Geoff Collett, Rosetta Dolphin, David Evans, Debbie Owen, Kevin Rush and Dale Selvester, Sean Bibby, Anthony Turton, Ted Palmer, Helen Brown, Paul Johnson,
- **ALSO PRESENT:** Councillor: Bernie Attridge attended as an observer

**<u>SUBSTITUTION</u>**: Councillor: Rob Davies (for Chrissy Gee)

- **<u>CONTRIBUTORS</u>**: Councillor Sean Bibby (Cabinet Member for Housing); Service Manager - Revenues and Procurement; Service Manager (Housing Welfare and Communities); Service Manager (Housing Assets); Housing & Prevention Service Manager and Business Performance Team Manager
- **IN ATTENDANCE:** Overview & Scrutiny Facilitator and Democratic Services Officer
- 17. <u>DECLARATIONS OF INTEREST (INCLUDING WHIPPING DECLARATIONS)</u> Councillor Ted Palmer declared a personal interest as a Council tenant.

#### 18. MINUTES (Link to Recording)

The <u>minutes</u> for the 12<sup>th</sup> June 2024 and <u>minutes</u> for the 17<sup>th</sup> July 2024 meeting were submitted for approval.

#### RESOLVED:

The at the minutes for the 12<sup>th</sup> June 2024 and 17<sup>th</sup> July 2024 meetings be approved as a correct record and signed by the Chair.

# 19. FORWARD WORK PROGRAMME AND ACTION TRACKING (Link to Recording)

The Overview & Scrutiny Facilitator presented the current <u>Forward Work</u> <u>Programme</u> and <u>Action Tracking</u> documents.

The Facilitator advised that the following annual reports would be added to the FWP following the meeting:-

• Housing Support Grant Programme

- Homeless
- Common Housing Register

Councillor Helen Brown requested that the following reports be added to the FWP for consideration by the Committee at future meetings:-

- Estate and Property Management to include clean and tidy neighbourhoods, protecting our investment and void properties and the re-introduction of EVA's and tenancy management inspections;
- NEW Homes options paper on the pros and cons of keeping NEW Homes as a trading company; and
- Options on the re-designation of Sheltered Housing properties deemed in low demand.

#### RESOLVED:

(a) That the Forward Work Programme be noted;

(b) That the Facilitator, in consultation with the Chair of the Committee, be authorised to vary the Forward Work Programme between meetings, as the need arises; and

(c) That the Committee notes the progress made in completing the outstanding actions.

#### 20. HOUSING RENT INCOME (Link to recording)

The Service Manager - Revenues and Procurement presented a <u>report</u> on the operational update for housing rent collection rates, including the 2023/24 yearend outturn rent and the 2024/25 current position.

In response to a request from Councillor Helen Brown, the Service Manager -Revenues and Procurement agreed to speak to Service Manager (Housing Assets) following the meeting to discuss what data sets around Council Tax losses could be provide in future update reports.

The Service Manager - Revenues and Procurement Dave Barnes also agreed to provide an analysis of write offs, to include information on the reasons for the write offs in future reports.

In response to a question from Councillor Dale Selvester, the Service Manager - Revenues and Procurement agreed to review what data sets could be provided around the financial impact of no longer collecting water rates.

In response to further questions from Councillor Dale Selvester, the Service Manager - Revenues and Procurement agreed to provide anonymised analysis on some of the higher rent arrear cases in future reports. The Chair asked if the Committee could be provided with an example of a Tenancy Contract. The Service Manager (Housing Welfare and Communities) agreed to provide this following the meeting.

#### RESOLVED:

That the Committee note the year end outturn for 2023/24 and the latest financial position for rent collections in 2024/25.

#### 21. COST OF LIVING & WELFARE REFORM (Link to recording)

The Service Manager (Housing Welfare and Communities) presented a <u>report</u> to provide information around the impacts of Welfare Reform and the cost of living crises on residents and the range of measures being implemented to help those affected to try, where possible, to mitigate the negative impacts.

Councillor Helen Brown recommended an additional recommendation, that a letter be written by the Chair, on behalf of the Committee, to the Minister for Works and Pensions to ask for consideration to be given to removing the cruel bedroom subsidy, which would elevate people out of the cost of living crisis.

Following a question around the winter fuel allowance, the Service Manager (Housing Welfare and Communities) said that she would circulate a link to the Council's website showing information and the location of warm hubs across the County, to the Committee following the meeting.

#### RESOLVED:

(a) That the Committee support the ongoing work to manage the impacts that welfare reform and the cost-of-living crisis has, and would continue to have, on some of the most vulnerable residents; and

(b) That the Committee note the support measures implemented via Welsh Government and the Council to mitigate impacts.

(c) That the Chair, on behalf of the Committee, write to the Minister for Works and Pensions to ask for consideration to be given to removing the cruel bedroom subsidy, which would elevate people out of the cost of living crisis.

#### 22. <u>ANNUAL PERFORMANCE REPORT 2023/2024 TO INCORPORATE THE</u> <u>COUNCIL PLAN END OF YEAR PERFORMANCE REPORT 2023/2024</u> (Link <u>to recording</u>)

The Business Performance Team Manager presented the <u>report</u> which set out an analysis, of how well the Council had performed against the Well-being Objectives, Priorities and Sub priorities at the end of the financial year 2023/24 of the Council Plan (2023-28). The Annual Performance Report also provided a summary of performance regarding other key areas of focus within the Council, i.e., Partnership and Collaboration Activity and the Strategic Equality Plan.

#### RESOLVED:

That the Committee support the 2023/24 Annual Performance Report, combined with the Council Plan End of Year 2023/24 Performance report, noting the performance achieved.

#### 23. VOID MANAGEMENT (Link to recording)

The Service Manager - Housing & Assets presented the key figures and key activities against the void action plan, as outlined in the <u>briefing note</u>.

#### RESOLVED:

That the update be noted.

#### 24. MEMBERS OF THE PRESS AND PUBLIC IN ATTENDANCE

None.

(The meeting started at 10am and ended at 11.23 a.m.)

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Chair

Meetings of the Community & Housing Overview & Scrutiny Committee are webcast and can be viewed by visiting the webcast library at <u>http://flintshire.public-i.tv/core/portal/home</u>



#### COMMUNITY & HOUSING OVERVIEW & SCRUTINY COMMITTEE

Date of Meeting	Wednesday 9 <sup>h</sup> October, 2024	
Report Subject	Forward Work Programme and Action Tracking	
Report Author	Overview & Scrutiny Facilitator	
Type of Report	Operational	

#### EXECUTIVE SUMMARY

Overview & Scrutiny presents a unique opportunity for Members to determine the Forward Work programme of the Committee of which they are Members. By reviewing and prioritising the Forward Work Programme Members are able to ensure it is Member-led and includes the right issues. A copy of the Forward Work Programme is attached at Appendix 1 for Members' consideration which has been updated following the last meeting.

The Committee is asked to consider, and amend where necessary, the Forward Work Programme for the Community Housing & Assets Overview & Scrutiny Committee.

The report also shows actions arising from previous meetings of the Community Housing & Assets Overview & Scrutiny Committee and the progress made in completing them. Any outstanding actions will be continued to be reported to the Committee as shown in Appendix 2.

RECOMMENDATION				
1 That the Committee considers the draft Forward Work Programme and approve/amend as necessary.				
2	That the Facilitator, in consultation with the Chair of the Committee be authorised to vary the Forward Work Programme between meetings, as the need arises.			
3	3 That the Committee notes the progress made in completing the outstanding actions.			

1.00	EXPLAINING THE FORWARD WORK PROGRAMME AND ACTION TRACKING			
1.01	Items feed into a Committee's Forward Work Programme from a number of sources. Members can suggest topics for review by Overview & Scrutiny Committees, members of the public can suggest topics, items can be referred by the Cabinet for consultation purposes, or by County Council or Chief Officers. Other possible items are identified from the Cabinet Work Programme and the Improvement Plan.			
1.02	In identifying topics for future consideration, it is useful for a 'test of significance' to be applied. This can be achieved by asking a range of questions as follows:			
	<ol> <li>Will the review contribute to the Council's priorities and/or objectives?</li> <li>Is it an area of major change or risk?</li> <li>Are there issues of concern in performance?</li> <li>Is there new Government guidance of legislation?</li> <li>Is it prompted by the work carried out by Regulators/Internal Audit?</li> <li>Is the issue of public or Member concern?</li> </ol>			
1.03	In previous meetings, requests for information, reports or actions have been made. These have been summarised as action points. Following meeting of the Corporate Resources Overview & Scrutiny Committee in July 2018, it was recognised that there was a need to formalise such reporting back to Overview & Scrutiny Committees, as 'Matters Arising' was not an item which can feature on an agenda.			
1.04	It was suggested that the 'Action tracking' approach be trialled for the Corporate Resources Overview & Scrutiny Committee. Following a successful trial, it was agreed to extend the approach to all Overview & Scrutiny Committees.			
1.05	The Action Tracking details including an update on progress is attached at Appendix 2.			

2.00	RESOURCE IMPLICATIONS
2.01	None as a result of this report.

3.00	CONSULTATIONS REQUIRED / CARRIED OUT		
3.01	In some cases, action owners have been contacted to provide an update on their actions.		

4.00	RISK MANAGEMENT
4.01	None as a result of this report.

5.00	APPENDICES			
5.01	Appendix 1 – Draft Forward Work Programme			
	Appendix 2 – Action Tracking for the Community & Housing OSC			

6.00	LIST OF ACCESS	IBLE BACKGROUND DOCUMENTS	
6.01	Minutes of previous meetings of the Committee as identified in Appendix 2.		
	Contact Officer:	Ceri Shotton Overview & Scrutiny Facilitator	
	Telephone:01352 702305E-mail:ceri.shotton@flintshire.gov.uk		

7.00	GLOSSARY OF TERMS
7.01	<b>Improvement Plan:</b> the document which sets out the annual priorities of the Council. It is a requirement of the Local Government (Wales) Measure 2009 to set Improvement Objectives and publish an Improvement Plan.

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# COMMUNITY, HOUSING & ASSETS OVERVIEW & SCRUTINY FORWARD WORK PROGRAMME **CURRENT FWP**

Date of meeting	Subject	Purpose of Report	Scrutiny Focus	Report Author
Wednesday 13 <sup>th</sup> November, 2024 10am	Housing Revenue Account (HRA) 30 Year Financial Business Plan	To consider the proposed Housing Revenue Account (HRA) Budget for 2024/25 and the HRA Business Plan.	Consultation	Chief Officer (Housing and Communities)
Page	Intensive Housing Management Solutions for Homeless Accommodation	To consult on engaging with a company for the purpose of delivering homeless accommodation services for up to 50 households experiencing homelessness.	Consultation	Housing & Prevention Service Manager
ge 11	Void Management	To provide an update on the number of Void properties and the work undertaken to bring the properties back into use.	Assurance Monitoring	Service Manager Housing Assets
Wednesday 11 <sup>th</sup> December, 2024 10am	De-carbonisation Strategy Update	To provide the Committee with an update on the De-carbonisation Strategy.	Information Sharing	Service Manager Housing Assets
	Garage Site Review	To provide an update on the Garage Site Review, to include information on the Car Parking Matrix.	Assurance Monitoring	Service Manager Housing Assets / Strategic Housing & Delivery Programme Manager
	Housing Strategy	To consider the Housing Strategy	Consultation	Strategic Housing & Delivery Programme Manager

## COMMUNITY, HOUSING & ASSETS OVERVIEW & SCRUTINY FORWARD WORK PROGRAMME

	Local Housing Market Needs Assessment	To present the Local Housing Market Needs Assessment	Information Sharing	Strategic Housing & Delivery Programme Manager
Wednesday 15 <sup>th</sup> January, 2025 10am	Welsh Housing Quality Standard (WHQS) Annual Update	To provide an update on the WHQS	Assurance Monitoring	Service Manager Housing Assets
IValli	NEW Homes review	To outline the outcome of the NEW Homes review.	Consultation	Strategic Housing & Delivery Programme Manager
	Food Poverty Update	To provide an update in relation to the work that has been ongoing and is planned in relation to the food poverty priority area.	Assurance Monitoring	Service Manager (Housing Welfare and Communities)
Wednesday 12 <sup>th</sup> February, 2025 10am	Common Housing Register (Single Access Route to Housing - SARTH)	To provide an annual update on the Common Housing Register.	Assurance Monitoring	Housing & Prevention Service Manager
	Housing Support Grant Programme	To provide an update on the Housing Support Grant Programme.	Information Sharing	Housing & Prevention Service Manager
Wednesday 12 <sup>th</sup> March, 2025 10am	Housing Rent Income	To provide the latest operational update on the collection of housing rent and to set out proposed changes to the Corporate Debt Recovery Policy to strengthen the rent enforcement process.	Assurance Monitoring	Service Manager - Revenues and Procurement
	Welfare Reform Update	To provide an update on the impacts of welfare reforms and the work that	Assurance Monitoring	Service Manager (Housing Welfare and Communities)

		is ongoing to mitigate them.		
Wednesday 9 <sup>th</sup> April, 2025 10am	Variation of Contracts	To present the proposed variations to Tenancy Contracts. To include information on Estate & Property Management.	Consultation	Service Manager (Housing Welfare and Communities)
	Homelessness	To provide an update to the Committee on the Homelessness Services.	Assurance Monitoring	Housing & Prevention Service Manager
Wednesday 7 <sup>th</sup> May, 2025				
10am				
Wednesday 11 <sup>th</sup> Juitte, 2025 ເດ 109m ີ່ ຜູ້	Communal Heating Charges 2025/26	To provide an update on the new Welsh Housing Quality Standards (WHQS) 2024 and the Council's obligations relating to delivery of the new standards.	Assurance Monitoring	Chief Officer (Housing and Communities)
	Sheltered Housing Review Update	To provide an update on the Sheltered Housing Review, to include information on options around the re- designation of properties	Assurance Monitoring	Service Manager (Housing Welfare and Communities)
Wednesday 9 <sup>th</sup> July, 2025				
10am				

### COMMUNITY, HOUSING & ASSETS OVERVIEW & SCRUTINY FORWARD WORK PROGRAMME

#### COMMUNITY, HOUSING & ASSETS OVERVIEW & SCRUTINY FORWARD WORK PROGRAMME <u>Items to be scheduled</u>

- Rent Income Pilot Scheme As suggested at 12.07.23 meeting
- Gypsy and Traveller Accommodation Assessment To present the Gypsy and Traveller Accommodation Assessment.

### **REGULAR ITEMS**

Month	Item	Purpose of Report	Responsible / Contact Officer
Quarterly / Annual	Performance Reporting	To consider performance outturns for improvement targets against directorate indicators.	Chief Officer (Housing and Assets)
Six monthly ව ය Si <u>x monthly</u>	Welfare Reform Update /Housing Rent Income	To provide an update on the impacts of welfare reforms and the work that is ongoing to mitigate them.	Service Manager - Revenues and Procurement / Service Manager (Housing Welfare and Communities)
Six monthly	Update on NEW Homes & Property Management	To update Members on the work of the NEW Homes & Property Management	Strategic Housing & Program Delivery Manager
Annually –	WHQS Capital Programme – Delivery review update	To provide an update on progress of the Welsh Housing Quality Standards (WHQS), that the Council is delivering through its Capital Investment Programme. Report to include information around the use of local labour and number of apprentices and school leavers.	Service Manager – Housing Assets
Monthly	Void Management	To provide a detailed update to the Committee on Void properties and the work undertaken to bring the properties back into use.	Service Manager – Housing Assets

#### ACTION TRACKING ACTION TRACKING FOR THE COMMUNITY & HOUSING OVERVIEW & SCRUTINY COMMITTEE

Meeting Date	Agenda item	Action Required	Action Officer(s)	Action taken	Timescale
10.01.2024	8. Cost of Living and Welfare Reform	Following a request that the information contained within the report be circulated to all Members for information, it was suggested that an information flyer be produced and circulated to all Members of the Council.	Jen Griffiths / Ceri Shotton	Information Flyer circulated to all Members via e-mail on 01.10.2024	Completed
06.03.2024	6. Dynamic Resource Scheduler (DRS) – Update	The Chair suggested that a demonstration of the DRS be given to the Committee once the system has gone fully live.	Sean O'Donnell / Denise Price	Still currently in the pilot phase. All Areas have only just been opened. Further testing still required.	Possibly November 2024
ע 1.09.2024 ת	4. Forward Work Programme and Action Tracking	The Facilitator advised that the following annual reports would be added to the FWP following the meeting:-	Ceri Shotton		Completed
		<ul> <li>Housing Support Grant Programme;</li> <li>Homeless; and</li> <li>Common Housing Register</li> </ul>		Added to FWP for 12 <sup>th</sup> February 2025 Added to FWP for 9 <sup>th</sup> April 2025 Added to FWP for 12 <sup>th</sup> February 2025	
11.09.2024	4. Forward Work Programme and Action Tracking	Cllr Helen Brown requested that the following reports be added to the FWP for consideration by the Committee at future meetings:-	Ceri Shotton		Completed

#### ACTION TRACKING

			1		
		<ul> <li>Estate and Property Management – include clean and tidy neighbourhoods, protecting our investment and void properties and the re-introduction of EVA's and tenancy management inspections –</li> <li>NEW Homes – options paper on the pros and cons of keeping NEW Homes as a trading company; and</li> <li>Options on the re-designation of Sheltered Housing properties deemed in low demand.</li> </ul>		Information to be included as part of the 'Variation of Contracts' report – 9 <sup>th</sup> April, 2025 Added to FWP for 11 <sup>th</sup> December 2024 Information to be included as part of the 'Sheltered Housing Review Update' report – 11 <sup>th</sup> June, 2025	
0 A)11.09.2024	5. Housing Rent Income	<ul> <li>In response to requests for additional information in future reports, the following was suggested/agreed:-</li> <li>Dave Barnes to speak to Sean O'Donnell following the meeting to discuss what data sets around Council Tax losses could be provide in future update reports;</li> <li>Dave Barnes agreed to provide an analysis of write offs, to include information on the reasons for the write offs in future reports;</li> <li>Dave Barnes agreed to review what data sets could be provided around the financial impact of no longer collecting water rates; and</li> </ul>	Dave Barnes / Sean O'Donnell Dave Barnes Dave Barnes	Information to be included in the next update report on 12 <sup>th</sup> March, 2025	Ongoing

		• Dave Barnes agreed to provide anonymised analysis on some of the higher rent arrear cases.	Dave Barnes		
11.09.2024	5. Housing Rent Income	The Chair asked if the Committee could be provided with an example of a Tenancy Contract. Jen Griffiths agreed to provide this following the meeting.	Jen Griffiths	Example of standards Tenancy Contract circulated to the Committee via e-mail on 30.09.2024	Completed
11.09.2024	6. Cost of Living and Welfare Reform	As shown in recommendation (c) that a letter be written to the Minister for Works and Pensions.	Ceri Shotton / Cllr Marion Bateman	Letter sent to the Rt. Hon Liz Kendall MP on 02.10.24	Completed
11.09.2024 Dage	6. Cost of Living and Welfare Reform	Following a questions around the winter fuel allowance, Jen Griffiths said that she would circulate a link to the Council's website showing information and the location of warm hubs across the County to the Committee following the meeting.	Jen Griffiths / Ceri Shotton	Link to website emailed to Members of the Committee on 11.09.2024	Completed
11.09.2024	Garage Site Review Matrix	During the briefing of the Garage Site Review matrix, following the meeting, it was agreed that information on garage sites allocated for Housing development, be included in the update report to the Committee in November.	Sean O'Donnell	Information to be included in the December report.	Ongoing

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#### COMMUNITY & HOUSING OVERVIEW AND SCRUTINY COMMITTEE

Date of Meeting	Wednesday, 9 <sup>th</sup> October 2024
Report Subject	Homelessness "Independent Review" Report – Neil Morland & Co Housing Consultants
Cabinet Member	Cabinet Member for Housing & Regeneration
Report Author	Chief Officer, Housing and Communities
Type of Report	Strategic

#### EXECUTIVE SUMMARY

Homelessness is a statutory service that continues to be under significant strain. External factors associated with the cost-of-living crisis and housing market conditions are increasing the levels of homelessness and the risks associated with homelessness for the people of Flintshire. As a result, this places more burden operationally and financially on the Council.

The need to offer accommodation and support to everyone who is homeless and at risk of rough sleeping continues to be a significant capacity and financial challenge. The local private sector housing market has seen significant challenges with fewer properties available each year and many landlords leaving the market, which in turn creates homelessness as properties are being sold and residents are asked to leave, whilst at the same time meaning fewer properties are available to support the relief of homelessness. Social housing supply in Flintshire does not meet the needs of the homeless cohort and social housing re-lets have reduced significantly over the last five years.

As a result of these challenges and an ever-increasing safety net for homelessness through progressive and person-centred legislation in Wales, expenditure on homeless has increased significantly over the last two years. All national and local trend data and projections suggest that demand for homelessness services and homeless accommodation will increase for the foreseeable.

In response to growing concerns over the financial implications of increasing levels of homelessness, the Chief Executive engaged an Independent Consultant (Neil Morland &Co.) to complete a review of the Councils Homelessness Service and the Council's approach to tackling homelessness more broadly.

The report by Neil Morland is attached (Appendix 1) as is work that is already underway in response to service capacity to meet growing demand (Appendix 4) along with cost projections for a number of ongoing activities that will support the transformation of homeless accommodation through moving away from costly hotel and bed and breakfast provision (Appendix 5).

RECO	RECOMMENDATIONS		
1	Committee note the findings and recommendations from Neil Morland & Co. and support this report to progress through the committee cycle with regular updates to be shared with Members in terms of progress against recommendations.		
2	Committee note the principle of cost avoidance and spend to save efficiencies to fund additional staffing capacity within the Housing & Prevention Service through diversifying the homeless accommodation portfolio, to maximise opportunity for successfully reducing spend on homeless accommodation.		
3	Committee note the need for Houses of Multiple Occupation (HMO's) within the homeless accommodation diversification plans.		

#### **REPORT DETAILS**

1.00	EXPLAINING THE INDEPENDENT HOMELESS SERVICE REVIEW REPORT
1.01	<b>Statutory Homeless Services</b> Local Authorities have duties as outlined in the Housing Wales Act 2014 Part 2, with regards to the prevention of homelessness and the management of homelessness when it occurs. Within the accessible documents detailed in section 6 of this report there is more information about the duties within this legislation (Helping Your Understand Housing Wales Act 2014).
	<ul> <li>When considering the core team activities for the Statutory Homeless Team this includes the following:</li> <li>Homeless Case Management</li> <li>Homeless Accommodation Management</li> <li>Homeless Accommodation Costs</li> </ul>
1.02	<b>Funding Homeless Services</b> Whilst a significant amount of funding is provided for prevention activity through the Housing Support Grant (HSG) to offer early intervention and homeless prevention activities in many forms, statutory services cannot be funded through HSG. Therefore the Council Fund is the main source of funding for the delivery of statutory homelessness services. This extends to:
	Homeless Officers and other staff dealing with Homeless Duties     and Assessments

	<ul> <li>Homeless Accommodation costs through lease charges and</li> </ul>
	hotel accommodation expenditure
	<ul> <li>Staff costs associated with the management of homeless</li> </ul>
	accommodation
	<ul> <li>Other costs associated with duties around homelessness such as storage costs and removals when people become homeless</li> </ul>
	Costs associated with the delivery of homelessness services, and
	specifically homeless accommodation are the largest growth area of
	expenditure for the Council and present a significant financial challenge.
	This is a considerable concern for the Council and as highlighted in the
	recent Audit Wales Review of Homelessness Services in Flintshire
	(released January 2924) is unsustainable given the current levels of funding and in the current financial landscape
	funding and in the current financial landscape.
	As part of the Councils response to areas of concern and high levels of
	expenditure, the Chief Executive engaged independent consultants to
	review the homeless service. The review by Neil Morland & Co. considered performance, legislative compliance, effectiveness of service
	delivery and scope for service improvement and efficiency.
1.03	Consultancy Services – Neil Morland & Co Housing Consultants
	Neil Morland & Co Housing Consultants are management consultant specialising in public and social housing policy and practice. Formed in
	2011, Neil Morland & Co Housing Consultants work throughout Britain and
	Ireland, with national and local governments, housing associations,
	voluntary organisations, and others, to improve the quality and potential of
	housing services and strategies.
1.04	Scope of the Independent Review
	Flintshire County Council commissioned the review to understand the
	quality of the homelessness and housing advice services it provides and
	what potential there is for improvement.
	Like all local authorities, Flintshire County Council has a legal obligation to
	provide advice and assistance to households who are homeless or
	threatened with homelessness. Following a recent increase in the levels of
	homelessness over the past year, Flintshire County Council wants an independent view and assessment of the effectiveness and efficiency of its:
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	<ul> <li>Housing advice, homelessness prevention and options services</li> </ul>
	<ul> <li>Homelessness strategy, services, and applications</li> </ul>
	<ul> <li>Temporary accommodation for statutory homeless households</li> </ul>
	The Council wants the review to take account of statutory guidance
	published by the Welsh Government and positive practice identified in
	research commissioned by the Welsh Government. It asked for the
	following questions to be considered:
	<ul> <li>Is the service achieving its statutory duties?</li> </ul>
	<ul> <li>Is the service meeting the needs of people who are homeless or</li> </ul>
	threatened with homeless?

	<ul> <li>Is the service delivering value for money?</li> <li>What is the services track record in delivering improvements?</li> <li>How well does the service manage performance?</li> <li>Does the service have capacity to improve?</li> </ul> The Council has asked for a report which includes a synopsis of the current position and operational effectiveness as well as offering clear recommendations for improvement in the context of the challenges all local authorities in Wales particularly and across the UK are facing in delivering homelessness services.
1.05	National Policy - Homelessness In October 2023 Welsh Government published a White Paper on Ending Homelessness in Wales. Consultation for the White Paper closed on the 16 <sup>th</sup> January 2024. Welsh Government have received over 160 formal responses and are now reviewing these responses. A wide range of changes to legislation relating to homelessness are outlined within the White Paper, with the most notable changes outlined
	below:
	<ul> <li>S66. Statutory Prevention Duty to be triggered at six months risk of homelessness not current two months</li> <li>Abolition of the priority need test – all eligible residents/households to be offered full duties</li> <li>Merging of the s73 Relief Duty and s75 Full Duty</li> <li>Changes to Local Connection Test – variation and additional protections for certain groups of people</li> <li>Significant changes to the Intentionality Test principles</li> <li>Firming up the Personal Housing Plan (PHP) process on a legal footing and creating statutory review points for PHP's</li> <li>Improved standards relating to homeless accommodation duties</li> <li>Changes to the Allocations Code of Guidance for Social Housing to increase access for homeless nominations</li> <li>Statutory Powers for Local Authorities to compel Housing Associations to take homeless nominations</li> <li>Extending "partners duties" around homelessness to a wider group of public sector services</li> <li>Introducing a "duty to identify and refer" homelessness on a range of public sector services</li> <li>Introduction of a Housing Sustainment Duty to support risks of repeat homelessness</li> </ul>
	There is an acknowledgement from Welsh Government that in light of the ambition of the changes suggested, and the current housing pressures across Wales, there will need to be careful consideration to the cost implications of the suggested changes and the timeframes for the roll out of additional duties within any new Act.
	All Local Authorities and a wide range of partners across Wales have responded formally and continue to make representations about the current financial challenges associated with Welsh Governments ambitions around

nding homelessness at the present time, and in light of additional tatutory responsibilities suggested within the White Paper.
<b>Sey Conclusions of the Independent Review</b> he key findings and conclusions of the review will be outlined by Neil forland and Tim Grey from Neil Morland & Co. during the meeting but in ummary the conclusions are as follows:
The Council is achieving its statutory homelessness duties. Corporate culture and governance arrangements concerning homelessness are excellent. It is easy to access homelessness assistance. Online advice and information for service users' needs to be improved. The Council does not experience high volumes of complaints about its homelessness and housing advice service. Consultation and feedback mechanisms for service users are in place but it's unclear how any feedback is put to use and whether people know about what changes have happened as a result of sharing their views.
The Council is meeting the needs of people who are homeless or threatened with homelessness. The provision of temporary accommodation that is accessible for people with physical disabilities, is demonstrative of the Council's ethos towards customer care. Nevertheless, service users should be more involved in influencing and improving service. Partnerships are focused on the needs of service users. There is an effective approach to dealing with people experiencing domestic abuse. There is good awareness of and response to legislative changes.
Spending on homelessness duties is not always delivering value for money. Council costs are comparable to others, allowing for local contacts, performance, and policy choices. In the longer term, value for money can be improved through more partnership working and better procurement of temporary accommodation.
The current leadership team overseeing homelessness and housing advice service clearly have delivered improvements.
The Council does well to manage the performance of its homelessness and housing advice service. There are numerous plans in place to make further improvements, including the rapid housing transition plan and recommendations made by Audit Wales. A dedicated staff member needs to be employed to ensure aims and future plans are coordinated, robust and delivered. There are arrangements and a culture in place to support continuous improvement of the homelessness and housing advice service.
The homelessness and housing advice service does have the capacity to improve, provided it is equipped with sufficient financial, staffing and IT resources. Spending on homelessness, needs to be reflective of casework activity and temporary accommodation levels. The proposed staffing restructure needs to be approved and progressed as quickly as possible. The in-house IT system needs to be swiftly progressed to reach its full potential or an off the shelf model needs to be purchased. Page 23

<ul> <li>1.07 Independent Review Recommendations As referenced within the Review Report, the Council is already aware of much of what has been said in the report and has set out a large number of areas where it wishes to make changes and improvements, notably in the Rapid Rehousing Transition Plan. That said the Review Report rightly provides a number of recommendations (11 in total) that the Council should prioritise in response to the current challenges faced around homelessness in Flintshire, these are summarised at appendix 2. 1.08 Responding to the Independent Review Regular Updates will be provided to the Ending Homelessness Board who will oversee not only this Improvement Plan but also the Councils Rapid Rehousing Transition Plan which is required by Welsh government. Where appropriate the established delivery groups of the Ending Homeless Board (Appendix 3) will be tasked with actions to implement changes to service delivery that are required across the Council to better respond to the current challenges around homelessness. Whilst many of these challenges are housing supply focussed the report supports the fact, they are not exclusively housing related and improved collaborative working across services is required to prevent more homelessness, manage residents expectations and deliver safe services for people experiencing homelessness As outlined in the Council's Rapid Rehousing Transition Plan all services within the Council and other public sector services will need to work together to "ensure homelessness is everyone's business" in Flintshire. The Ending Homelessness Board is leading on this agenda and a Rapid Rehousing Strategic Co-ordinator is soon to be appointed using Grant Funding from Welsh Government.</li></ul>		1
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2.00	RESOURCE IMPLICATIONS
2.01	Detailed below are the cost implications associated with the delivery of Homelessness Services in Flintshire:
	<b>Revenue:</b> Statutory Homeless Services are funded through Council Fund. Additional duties placed on Councils and the current demands on services and emergency housing is resulting in additional expenditure and budget pressures when the Council is already facing significant financial challenges. Whilst some grant is available for 2023-2024 for emergency housing and other discretionary funding, this is not sufficient to cover the full scale of the financial risk.
	The Neil Morland review picks up on insufficient staffing capacity for homelessness and the restructure of the Housing & Prevention Service. Whilst Housing Support Grant (HSG) can be utilised to compliment statutory homeless services, they cannot exclusively fund homeless services.

Significant work in recent months has been undertaken to review modelling of costs associated with delivery of homelessness services in Flintshire, with a sharp focus on reducing spend on homeless accommodation. Efficiencies can be achieved through better prevention work to avoid more people becoming homeless, and through the planned transformation of homeless accommodation. By creating other forms of homeless accommodation, we can move away from costly and unsuitable homeless accommodation.

However, efficiencies through using alternative forms of homeless accommodation cannot be truly maximised if the service is not appropriately staffed. More information about this can be found within the Risk and Mitigations section of this covering report (3.00 Impact Assessment and Risk Management).

The Housing & Prevention staff structure and associated cost are attached as Appendix 4. Appendix 4 also outlines the increase in demand for service through homeless caseloads and households in homeless accommodation data.

Whilst the Neil Morland review recommends 30+ Homeless Officers and 12 Temporary Accommodation Officers, levels of staffing outlined in Appendix 4 are more realistic. The planned restructure will bolster current staffing levels and will create opportunity for better quality services for residents through prevention activities and safe and effective management of alternative forms of homeless accommodation. 58% of the expenditure linked to the increase in staffing is covered through HSG and 42% is Council Fund.

Financial modelling has been undertaken for the homeless service and the potential reduction to the current pressure in the medium term financial strategy for 2025/26 of  $\pounds$ 7.500m. The financial options are as follows:

- 1. Implementation of the staffing structure as outlined in Appendix 4 to improve homeless prevention outcomes and maximise housing costs recovery rates.
- Increased number of alternative properties as outlined in Appendix 5)
- 3. Increased number of HRA properties including house shares utilising TACP funding where available

The potential efficiencies of these recommended measures could bring the pressure for 2025/26 within a range of  $\pounds$ 3.500m -  $\pounds$ 5.500mm therefore reducing the pressure by a minimum of  $\pounds$ 2.00m however, it is important to note that this is based on demand levels staying within the range we have seen over the last 18 months and any spikes in demand could further increase the financial pressure to the service.

**Capital:** Creating supply of housing will require significant capital investment and have been flagged early within the Councils Capital Programme. The Flintshire Housing Prospectus has been approved by Council and shared with our Housing Partners and Social Housing Grant

supports ambitious plans to increase housing supply at scale and pace. The Transitional Accommodation Capital Programme (TACP) grant regime also supports the purchase and redevelopment of accommodation for the purpose of move on accommodation or additional homeless accommodation. A summary of progress to date and further plans to increase supply of homes through the TACP grant is in Appendix 6.

**Human Resources:** The Homeless Team has seen a significant amount of turnover in staff in recent years. Further recruitment as part of the Housing & Prevention Service restructure is required as referenced above and within Appendix 4. Opportunities to fund posts and salaries is being maximised through Housing Support Grant and other funding streams such as the Rapid Rehousing Co-ordinator Funding.

Levels of sickness and work-related stress is closely monitored within this high demand service. Vicarious trauma because of difficult cases which can cause significant distress to staff. This is managed through a range of additional support activities on top of the Councils Corporate Employee Assistance Programme (Vivup). Additional staff require additional capacity for supervision and management to ensure staff are supported with their casework and for their well being.

Page 16 onwards of Appendix 1 titled Staffing Structure highlights the challenges and potential response to adopting safe staffing levels for casework and accommodation management based on current levels of homeless service demand.

3.00	IMPACT ASSESSMENT AND RISK MANAGEMENT
3.01	The following risks and mitigations have been identified by way of control measures:
	<b>Risk:</b> Failure to respond corporately to the issues highlighted in the Independent Review will likely result in further high-cost expenditure on homelessness and mean the Council will not be able to meet its statutory duties around homelessness in the the short term and also in the long term as legislative changes occur.
	<ul> <li>Mitigations:</li> <li>Respond to the findings of the Independent Review and the associated Recommendations (11 in total and summarised in Appendix 2).</li> <li>Delegate responsibility to the Ending Homelessness Board to oversee the response to the Independent Review and ensure regular updates to COT, Scrutiny Committees and Cabinet</li> <li>Ensure services associated with homelessness activity are appropriately targeted and delivered to support homelessness agenda e.g. Social Services for vulnerable people experiencing homelessness, Voids Repairs for timely return of empty properties for HRA housing allocations to homeless households etc</li> </ul>

**Risk:** Workforce will be insufficient to meet levels of demand for homeless services and will fail to deliver on the Councils statutory obligations for homelessness and the Rapid Rehousing Agenda.

#### Mitigations:

- Deliver the Housing & Prevention Service restructure on principle of invest to save.
- Recruit and retain a sufficient scale of workforce, whom are appropriately skilled and trained are available to deliver homelessness and temporary accommodation services.
- Achieve efficiencies through cost avoidance on hotel accommodation through additional prevention work, and management of alternative forms of homeless accommodation by recruiting additional staff.
- Constantly review levels of homeless cases and homeless accommodation to flex with changes in service demand

**Risk:** Providing poor services to people who experience homelessness and exposing them to significant disruption (out of county placements) and potential risk in homeless accommodation settings though unsafe housing management practices.

#### Mitigations:

- Invest in additional staff for the Homeless Team to enable safe caseloads, improved casework and prevention outcomes (see p16 onwards Appendix 1 – Staffing Structure)
- Ensure that additional accommodation taken on to the Councils homeless accommodation portfolio, has sufficient staff to adhere to property compliance for health & safety and industry standards.
- Budget for repairs and maintenance within the homeless portfolio to maintain safe housing conditions.

**Risk:** Continue to be reliant on costly B&Bs and Hotel Provision as the main source of homeless accommodation and as a result costs continue to escalate creating further budget pressures as a result of barriers to homeless accommodation diversification (example HMO applications refused for homeless accommodation.

#### Mitigations:

- Progress the options outlined within Appendix 5 and monitor their impact and potential for increasing scale in future years.
- Develop a communication strategy for engagement with elected members so they understand the benefits of well managed small scale HMO's with the homeless accommodation portfolio.

**Risk:** People placed in homeless accommodation are not supported or managed and as a result become more vulnerable or challenging and as a result place additional pressures on other services and the community (example: residents causing anti social behaviour creates demand for Police and FCC Housing Officers along with disruption within neighbourhoods).

#### Mitigations:

2.00	<ul> <li>Ensure that additional accommodation taken on to the Councils homeless accommodation portfolio, has sufficient staff levels to ensure residents are managed in line with the terms and conditions of their occupancy agreements.</li> <li>Support the planned restructure to ensure capacity within the workforce to meet the needs of vulnerable people experiencing homelessness.</li> </ul>		
3.02	3.02 Ways of Working (Sustainable Development) Principles Impac		
	Long-term	Positive – Increase in targeted support and alternative delivery methods to ensure services are inclusive for all.	
	Prevention	Prevention - Preventing homelessness through ensuring there is adequate support and accommodation to cater for a range of peoples needs.	
	Integration	Positive – Increased integration between services and partner organisations.	
	Collaboration	Positive – Increased collaboration between services, partner organisations and service users.	
	Involvement	Positive – Service user involvement to help shape effective services so that support is timely and person centred.	
3.03	3.03 Well-being Goals Impact		
	Prosperous Wales	Positive – With additional funding more jobs will be created to deliver housing related support on a greater scale within Flintshire. Opportunities to support the labour market through training and development opportunities are being considered in conjunction with colleagues from Communities for Work.	
	Resilient Wales	Positive – Creating services that are prevention focused and build resilience to avoid households becoming homeless	
	Healthier Wales	Positive – Reduction in rough sleeping, overcoming health inequalities associated with homelessness and poor housing conditions and investment to increase targeted support for people with housing issues and mental ill-health	
	P	age 28	

More equal Wales	Positive – Services are delivered in a way that are inclusive for all. Consideration has been given to local and regional gaps in provision for often marginalised communities such as the homeless, those with mental health or substances issues and the LGBTQ+ community.
Cohesive Wales	No Impact
Vibrant Wales	No impact
Globally responsible Wales	No impact

4.00	CONSULTATIONS REQUIRED/CARRIED OUT
4.01	Consultation with the workforce and partners has been undertaken as part of the Independent Review.
4.02	Engage with residents to ensure there is a culture of involvement and service user insight within homelessness services (recommendation from Audit Wales and Neil Morland & Co.) Work is already underway on a Resident Involvement Framework with Shelter Cymru Take Notice Service.
4.03	Consultation with staff and the Unions as part of the restructure of the Housing & Prevention Service.
4.04	Engage with local ward members and key stakeholders at such a time as HMO's are being explored at the local level (example: engagement with Saltney Members and local Policing Team for the 9 bed HMO referenced within Appendix 5 already undertaken).

5.00	APPENDICES
5.01	Appendix 1: Neil Morland & Co Independent Review Report
	Appendix 2: High Level Recommendations (11)
	Appendix 3: Ending Homelessness Board Governance Structure
	Appendix 4: Housing & Prevention Service – Revised Structure and cost
	and demand data
	Appendix 5: Homeless Accommodation Transformation Activities
	Appendix 6: TACP Progress and Pipeline Summary

6.00	LIST OF ACCESSIBLE BACKGROUND DOCUMENTS
6.01	Neil Morland & Co - Housing Consultants
6.02	Ending Homelessness in Wales: High Level Action Plan 2021-2026
6.03	Ending Homelessness White Paper Responses

7.00	CONTACT OFFICER DETAILS
7.01	Contact Officer: Martin Cooil, Housing & Prevention Service Manager Telephone: 07880 423234 E-mail: martin.cooil@flintshire.gov.uk

8.00	GLOSSARY OF TERMS
8.01	<b>Rough Sleeper</b> A person who is homeless and who sleeps without adequate shelter, typically on the streets of a town or city. Includes people living in sheds, outbuildings etc. People who sleep rough or are at risk of sleeping rough now meet priority need thresholds (see below)
	Housing Support Grant Early intervention housing related support programme targeted at people in housing need and at risk of homelessness. The HSG programme brings the historic funding streams for Supporting People, Homelessness Prevention and Rent Smart Wales grants into 1 single funding stream.
	<b>Priority Need</b> Categories of people who are protected the most when assisting people under the Housing Wales Act 2014 homeless legislation. Those in Priority Need are owed accommodation duties.
	<b>Transitional Accommodation Capital Programme</b> Grant funding to bring forward good quality longer term accommodation at pace to support everyone in housing need (those in temporary accommodation and initial accommodation for resettlement).
	<b>Rapid Rehousing</b> Rapid Rehousing is an internationally recognised approach which ensures that anyone experiencing homelessness can move into a settled home as quickly as possible, rather than staying in temporary accommodation for long periods of time.
	Houses of Multiple Occupation House in Multiple Occupation often abbreviated to HMO is a technical term to signify that people of multiple households (i.e. not a single family unit) are living in the same building. Typically, each resident has their own rental contract for the period of occupation.

# A review of Flintshire County Council's homelessness and housing advice services

July 2024



Tim Gray & Neil Morland





#### **Flintshire County Council**

Flintshire County Council is a unitary local authority, founded on 1st April 1996, that is located in North East Wales. Flintshire County Council administers the full range of local government services for the area, including administering public law homelessness functions.

#### **Neil Morland & Co Housing Consultants**

Neil Morland & Co Housing Consultants are management consultant specialising in public and social housing policy and practice. Formed in 2011, Neil Morland & Co Housing Consultants work throughout Britain and Ireland, with national and local governments, housing associations, voluntary organisations and others, to improve the quality and potential of housing services and strategies.

Acknowledgement: This report was commissioned and funded by Flintshire County Council. Thanks go to Vicky Clark and Martin Cooil for their invaluable assistance during the research and writing of this report.

Disclaimer: All views and any errors contained in this report are the responsibility of the authors. The views expressed should not be assumed to be those of Southwark Council or any of the persons who contributed to this report. The information contained in this report is accurate at the date of publication. The information in this report should not be considered financial or legal advice. Southwark Council, nor Neil Morland & Co Housing Consultants, are not authorised to provide financial or legal advice. No responsibility can be taken by the commissioners or the authors of this report for any loss or damage incurred, by any persons or organisation acting or refraining from action as result of any statement in this report.

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## **Executive Summary**

## **Key findings**

The Council seeks to effectively communicate its service users, potential service users, community and stakeholders about its homelessness and housing advice service. However, consultation could be carried out about the quality and effectiveness of the service with service users and stakeholders.

The service is responsive to the diversity of the community. More could be done to make sure that all users, or potential users have fair and equal access to the service.

A provision of good quality effective and appropriate housing advice has been developed. More homelessness prevention and options to help people remain in their existing home or obtain accommodation, would be beneficial.

Appropriate advice is provided to all homeless people and those at risk of homelessness, across all tenures. There should be an increase in provision to help people remain in their existing home, whenever safe to do so.

The Council has strategies and plans set out activities to prevent homelessness and make sure there is sufficient accommodation and support available for people who will become homeless or who are at risk of becoming so. The local rapid rehousing strategy set up plans for access to appropriate accommodation for those who no longer require supported housing or are ready to move from temporary accommodation.

Achieving local objectives to tackle homelessness will only be effective if there are sufficient staffing resources, both operationally and strategically, to deliver local action plans.

The service is efficient, effective and customer focused and homelessness casework is administered in line with the relevant legislation, codes of guidance priority needs orders and good practice.

The provision of temporary accommodation for homeless household is not always appropriate and not always suitable. Furthermore, there is not enough support for those placed in it.

The Council needs a plan to reduce the number of households in bed and breakfast accommodation, as this provision is costly.

The Council could better maximise the impact of its resources for homelessness and housing advice services, by making better use of its own housing stock.

The Council could achieve better value for money by establishing partnerships and improving its performance to service users. For example, temporary accommodation could be procured with neighbouring local authorities, collection of charges from service users could be improved.

The Council could more smartly procure temporary accommodation to achieve better value for money, which would also benefit households who are homeless.

Overall, the Council operates a good quality homelessness and housing advice service, and there is excellent potential for the service to further improve.

## **Key conclusions**

The Council is achieving its statutory homelessness duties. Corporate culture and governance arrangements concerning homelessness are excellent. It is easy to access homelessness assistance. Online advice and information for service users' needs to be improved. The Council does not experience high volumes of complaints about its homelessness and housing advice service. Consultation and feedback mechanisms for service users are in place but it's unclear how any feedback is put to use and whether people know about what changes have happened as a result of sharing their views.

The Council is meeting the needs of people who are homeless or threatened with homelessness. The provision of temporary accommodation that is accessible for people with physical disabilities, is demonstrative of the Council's ethos towards customer care. Nevertheless, service users should be more involved in influencing and improving service. Partnerships are focused on the needs of service users. There is an effective approach to dealing with people experiencing domestic abuse. There is good awareness of and response to legislative changes.

Spending on homelessness duties is not always delivering value for money. Council costs are comparable to others, allowing for local contacts, performance and policy choices. In the longer term, value for money can be improved through more partnership working and better procurement of temporary accommodation.

The current leadership team overseeing homelessness and housing advice service clearly have delivered improvements.

The Council does well to manage the performance of its homelessness and housing advice service. There are numerous plans in place to make further improvements, including the rapid housing transition plan and recommendations made by Audit Wales. A dedicated staff member needs to be employed to ensure aims and future plans are coordinated, robust and delivered. There are arrangements and a culture in place to support continuous improvement of the homelessness and housing advice service.

The homelessness and housing advice service does have the capacity to improve, provided it is equipped with sufficient financial, staffing and IT resources. Spending on homelessness, needs reflective of casework activity and temporary accommodation levels. The proposed staffing restructure needs to be approved and progressed as quickly as possible. The inhouse IT system needs to be swiftly progressed to reach its full potential or an off the shelf model needs to be purchased.

# Introduction

This review has been carried out by Neil Morland & Co housing consultants at the request of Flintshire County Council, and looks at the operation and performance of the Council's homelessness and housing advice service.

The review takes place at a time of great change and at a time of exceptional pressure for homelessness service across Wales.

In the recent past the Covid pandemic changed the landscape for the delivery of homelessness and housing advice services across Wales radically and for the long term. This includes a shift in how services are delivered and how communication is managed. It also includes a profound change in the expectation of the Welsh government on local authorities in respect of accommodating single people who would not previously have been in priority need.

The Welsh government has also required every local authority in Wales to produce a Rapid Rehousing Transition Plan over the period 2022 to 2027, and in its recent white paper has confirmed its intention to abolish homelessness priority need altogether.

This new requirement to accommodate more single people has coincided with increased homelessness demand, especially as a result of more evictions from the private rented sector and the cost of living crisis.

Across Wales the combination of these and other changes has led to an increase in the use of temporary accommodation and especially to a marked increase in the use of bed and breakfast or hotel accommodation, especially for single people.

In Flintshire this has been exacerbated by the acute lack of I-bed accommodation available to let in either social housing or in the private rented sector, leading to a recent period in which the use of hotels has grown rapidly and at great expense to the Council.

This review follows the review of the homelessness and housing advice service recently completed by Audit Wales, and comes at a time of transition following the completion of the Flintshire Rapid Rehousing Transition Plan and the establishment of the Flintshire Ending Homelessness Board, and prior to the implementation of the Council's planned restructure of the homelessness and housing advice service.

# Scope and methodology

Flintshire County Council has commissioned the review in order to understand the quality of the homelessness and housing advice services it provides and what potential there is for improvement.

Like all local authorities, Flintshire County Council has a legal obligation to provide advice and assistance to households who are homeless or threatened with homelessness. Following a recent increase in the levels of homelessness over the past year, Flintshire County Council wants an independent view and assessment of the effectiveness and efficiency of its:

- Housing advice, homelessness prevention and options services
- Homelessness strategy, services and applications
- Temporary accommodation for statutory homeless households

Flintshire County Council wants the review to take account of statutory guidance published by the Welsh Government and positive practice identified in research commissioned by the Welsh Government. Flintshire County Council has asked for the following questions to be considered:

- Is the service achieving its statutory duties?
- Is the service meeting the needs of people who are homeless or threatened with homeless?
- Is the service delivering value for money?
- What is the services track record in delivering improvements?
- How well does the service manage performance?
- Does the service have capacity to improve?

Flintshire County Council has asked for a report which includes a synopsis of the current position and operational effectiveness as well as offering clear recommendations for improvement in the context of the challenges all local authorities in Wales particularly and across the UK are facing in delivering homelessness services.

In order to deliver this review, Neil Morland and Co has carried out the following activities: Semi-structured one-to-one interviews key Flintshire County Council officers across a range of services and with external stakeholders including Shelter, probation, substance misuse services and housing association partners.

Focus groups with key stakeholders, including officers working in the homelessness and housing advice service, external and internal partners, and service users at the Glanrafon homelessness hub.

Analysis of information provided to applicants.

Analysis of homelessness data published by the Welsh Government and the Council to compare levels of homelessness in Flintshire to other Welsh local authorities.

Analysis of a selection of Flintshire's policies, procedures and homelessness decision letters.

Examination and analysis of data provided by the Council in a variety of areas.

Consideration of relevant Council plans, reports, documents and financial information Site visits to temporary accommodation.

Regular consultation and dialogue with service heads throughout the review period.

We would like to express our thanks for the time given by council officers, external partners and service users to meet with us and to provide detailed written information.

# Findings

# **Flintshire in context**

The clear and overarching problem in Flintshire is that the number of households in temporary accommodation has been rising quickly and that this increase has almost entirely been in the use of Bed & Breakfast (B&B) or other hotel accommodation.

The number of households in emergency accommodation rose by 75% from 124 in April 2023 to 217 in April 2024, with 191 of those placements in hotel accommodation, 15 in holiday accommodation and 11 in Mostyn Lodge, a mid-19<sup>th</sup> century inn that was latterly converted into a hotel, which today provides temporary accommodation for single homeless men.

If this rate of expansion were to continue unchecked, then there could be over 360 households in hotels by April 2026.

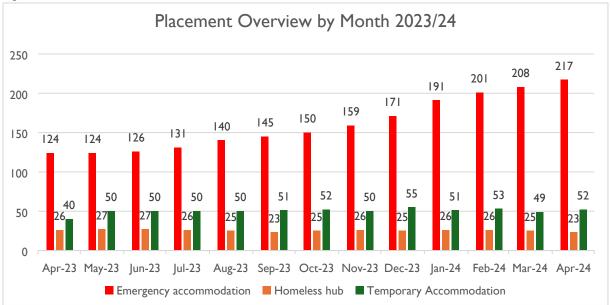


Figure 1.

#### Why is this the case?

Comparing Flintshire with other local authorities in Wales, the published data suggests that temporary accommodation in Flintshire is still below the Wales average per 10,000 households. At the end of September 20231 there were 28 households per 10,000 in TA in Flintshire, compared with 41 for Wales as a whole.

<sup>&</sup>lt;sup>1</sup> The latest period for which household TA figures are available

https://statswales.gov.wales/Catalogue/Housing/Homelessness/Temporary-Accommodation

However, TA in Flintshire has been growing faster than in Wales as a whole, with a 50% increase in the number of individuals in TA between April 2023 and February 2024 in Flintshire compared to an 11% increase in Wales over the same period.

It is also true that a higher percentage of TA in Flintshire is B&B compared to the Wales average. In February 2024 58% of the individuals in TA in Flintshire were in B&B compared with 33% for Wales. 52% of children under 16 in TA in Flintshire were in B&B compared to 24% for Wales.

And as Figure 1. shows, this percentage is currently growing every month.

There are limitations in comparing Flintshire's recent performance on homelessness with other local authorities in Wales as the relevant data on homelessness presentations, homeless prevention and homelessness relief outcomes is only available for other local authorities up to the end of March 2023. As the rapid growth in TA in Flintshire has primarily happened in 2023/24, it would be helpful to have benchmarking information available for that period in order to make a comparison.

Nevertheless, it is possible to discover a partial picture of how Flintshire ranks across Wales on a number of measures, based on the published statistics.

Period	Measure	Flintshire	Wales	Flintshire rank in Wales (out of 22 LAs)
	Households threatened with			
2022/22	Homelessness within in 56 days -Rate	40		
2022/23	per 10,000 households (Section 66)	48	67	12th highest
	Households successfully prevented			
2022/22	from Homelessness – Percentage (%)	500/	500/	
2022/23	(section 66)	59%	59%	8th highest
	Households assessed as homeless and			
	owed duty to secure – Rate per 10,000			
2022/23	households (Section 73)	49	91	22nd highest (i.e. lowest)
	Households successfully relieved from			
	Homelessness – Percentage (%)			
2022/23	(Section 73)	41%	30%	6th highest
Feb-24	Individuals in TA per 10,000 households	55	85	l4th highest
	Dependent children in TA per thousand			
Feb-24	households	8	23	18th highest
	Individuals in B&B and hotels per			
Feb-24	10,000 households	32	28	8th highest
	Dependent children in B&B and hotels			
Feb-24	per 10,000 households	4.3	5.5	10th highest
	Percentage of individuals in TA who are			¥
Feb-24	in B&B	58%	33%	8th highest

Figure 2.

Feb-24	Percentage of dependent children in TA who are in B&B	52%	24%	4th highest
Oct 23 to Feb 24	Growth in number of individuals in TA per 10,000 households between October 2023 and February 2024	10	3	4th highest

In addition to these statistics, Flintshire only had one reported individual sleeping rough in February 2024 and no more than 4 people reported sleeping rough at any time since April 2023.

It is also noteworthy that, although the way the statistics are presented makes ranking difficult in these areas, in the period from April 2023 to September 2023, Flintshire had a far higher proportion of applicants than the Wales average where homelessness duties had ended due to applicant non-cooperation and also where applicants were assessed as not in priority need for assistance.

Flintshire also had slightly higher than average numbers of households found to be not homeless or threatened with homelessness compared with other Wales authorities.

Taken together, this statistical evidence leads to a number of conclusions:

- When considered as a proportion of the population, in 2022/23 Flintshire had a lower-than-average number of households owed a S66 prevention duty and the lowest number of households in Wales owed a S73 relief duty.
- However, this has changed in 2023/24. Based on a comparison of the published sixmonth figures for April to September 2023 and for the year 2022/23, the number of S66 duties in Flintshire grew by 45% whilst the number of S66 duties in Wales fell by 1%. The number of relief duties in Flintshire climbed by 64% in Flintshire but by only 4% in Wales.
- Therefore, although faced with relatively low demand in 2022/23 compared to the rest of Wales, homelessness demand, as measured by the number of S66 and S73 duties owed, has risen much faster in Flintshire than in Wales in 2023/24.
- Flintshire was better than average in Wales at both successful homelessness prevention and especially successful homelessness relief in 2022/23. Also, based on the Flintshire council 2023/24 end of year performance report, the percentage of successful homelessness preventions and reliefs was maintained in 2023/24 compared to the previous year.

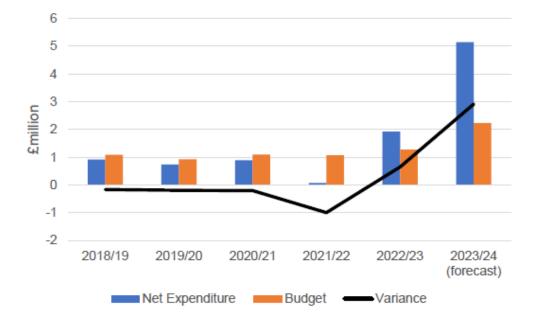
- Although growing faster than in Wales as a whole, the number of people in TA per 10,000 households was still lower than the Wales average in February 2024 and much lower for the number of dependent children in TA.
- However, the percentage of both adults and especially children in TA who are in B&B or hotel accommodation are well above average, with the percentage of children in TA who are in B&B or hotel accommodation, the 4th highest in Wales.
- The growth in the number of people in TA in Flintshire over the 4 months from October 20232 to February 2024 was the 4th highest in Wales per 10,000 households.

# **Financial situation**

The December 2023 Audit Wales report on Flintshire's homelessness service analysed net expenditure by Housing Solutions between 2018/19 and the forecast spend for 2023/24. As shown in Figure 3. expenditure increased significantly in 2022/23 from the Covid related low in 2021/22 and then dramatically in 2023/24.

#### Figure 3.

Housing Solutions spend, 2018-2019 to 2023-2024 (forecast)



The main reason for the rapid rise in expenditure is the increased costs of hotel accommodation matching the large increase in the usage of this accommodation in 2023/24.

<sup>&</sup>lt;sup>2</sup> October 2023 is the earliest date these published figures

Costs of hotel accommodation used by Flintshire range from block booked accommodation at an average of £89 per night to over £125 per night, with unit costs tending to increase as more supply is required and the supply of less expensive accommodation is exhausted.

Approximately  $\pounds$ 9.40 per night is eligible for Housing Benefit subsidy for hotels, meaning a net cost to the council of approximately  $\pounds$ 95 per night on average, which may be expected to rise with inflation over time.

As a result, each B&B or hotel room costs the council approximately £35,000 net per year without including management and support costs, or any shortfall in income collection.

On this basis, the approximately 235 rooms per year currently in use cost the council over  $\pounds 8m$  per year.

If B&B use continues to rise at the current rate, the council estimates a potential cost in 2025/26 of around  $\pounds$ 14.7m which would include a budget pressure of around  $\pounds$ 11.2m.

Clearly, costs of this kind are extremely difficult for Flintshire to absorb, and urgent action is needed to reduce them.

The Council has identified a number of options with the potential to reduce the use of B&B, which are discussed later in the report.

# Audit Wales report

The Council's homelessness service was reviewed by Audit Wales between April 2023 and October 2023, with a report published in December 2023.

The review was attempting to answer the question: "In seeking to address homelessness, is the Council effectively adapting its strategic intent to deliver a long-term sustainable preventative approach?"

In summary, Audit Wales concluded that "Flintshire Council is delivering a high-quality service, but this is unsustainable with its current funding".

Underpinning this conclusion, as well as highlighting the financial pressures shown in Figure 3. above, the report observed that:

• The Council understands the factors impacting on the homelessness situation it currently faces and how these factors are changing over time, and that it draws on

evidence from a range of internal and external sources.

- The homelessness service works well with partners and has communicated its strategy and objectives across service areas and with senior leaders and Members.
- The homelessness service has built an excellent reputation with external partners for its openness and professionalism.
- The strategic relationship with Registered Social Landlords is good.
- The Homelessness service is facing an increase in demand, with presentations becoming more complex and expectations of service users higher than before.
- The Council faces difficult decisions to ensure the service is sustainable in the future and is currently trying to provide a service to meet demand on a budget that does not meet this ambition.

The Audit Wales report recommends that:

- "To ensure the service is sustainable operationally and strategically, the Council ensures that funding is available to maintain its levels of service or make decisions on service delivery based on funds available."
- "The Council ensures arrangements for evaluating its homelessness activities are applied to all activities so it can provide assurance of its impact on service users and efficiencies."
- "To better understand the needs of residents, the Council should widen its engagement activity with residents to cover the development and evaluation of all services."

# The operation of the service

The Flintshire Homelessness and Housing Advice Service is planning to restructure in the near future. This will include growth in the number of officers employed by the service in order to better meet increased demand and the increased number of households in TA as well as building in more strategic capacity to plan for changes in the medium and longer term, including delivering the Council's Rapid Rehousing Transition Plan 2022 to 2027.

The restructure is currently in the phase where the jobs in the proposed new structure are being evaluated and the budget finalised.

Our understanding is that the restructure is long awaited by the staff in the service, many of whom feel under considerable pressure.

## Staffing structure

A successful staffing structure is one where employees is sufficient number of staff so that everyone has a manageable workload. There is nothing set down in law or statutory guidance that stipulates acceptable caseload levels. Therefore, it is left to local authorities to determine for themselves the number of cases that an officer might be responsible for managing. As a consequence, caseload levels vary considerably across the country.

However, social work practice standards, which are broadly applicable for homelessness practitioners, offer some useful advice to make decisions about caseload levels for homelessness officers.

The Local Government Association (LGA) advises, as part of a standards for employers of social workers, that employees should not experience excessive workloads, as this can result in unallocated cases and long waiting times for people needing help. The LGA goes on to recommend that local authorities should:

- I. Use a system of casework allocation, which has been jointly agreed with employees and line managers to set transparent safe working levels.
- II. Make sure employee's workloads are regularly assessed, with each employee, to take account of work complexity, individual worker capacity and time needed for supervision and continuous professional development.
- III. Make sure that cases are allocated transparently, with prior discussion with individual employees and with due consideration to experience and existing caseloads.
- IV. Make sure that an employee's professional judgement about casework issues is respected and encourage employees to declare anything that might affect their ability to carry out that role competently or may affect their fitness to advise and assist.
- V. Take contingency action when workload demands exceeded staffing capacity and report regularly to senior managers about workload and capacity issues.
- VI. Publish information about average caseloads.

Research in Scotland as recommended limit of 15 cases for children's social workers and 20 to 25 for peers carrying out adults and criminal justice work. Research showed that when caseload levels reached unmanageable levels, people ended up working unpaid overtime to

keep on top of their workload, leading to a poor work-life balance, people spending less time on training and professional development, and ultimately resulting in burnout and people choosing to lead their role or become absent from work due to sickness.

When taking account 723 households were provided with assistance by the Council over the course April to September 2023 (the period of time for which the most recent official statistics are available), and even assuming employees would typically hold a case load of 30, (slightly higher than the recommended number for social work practitioners, but taking account of the fact that the responsibilities of homelessness caseworkers are different to that of social workers), total of 24 employees would be required to ensure that everybody had safe caseload levels. Two or three team leaders would be required to ensure people are properly supervised, if recommended employee manager ratios (i.e. between five and nine directly reporting employees for each manager) are adhered to.

In terms of how casework is divided, it has become common practice across many local authorities for some staff to concentrate on prevention casework and other staff to concentrate on relief and main duty casework. If workloads were divided in this way, approximately one third (e.g. eight) of employees would need to be deployed on administering assistance under section 66, with a further 50% (e.g. 12) of employees being deployed to administer assistance under sections 73 and 75. The remaining number of employees (e.g. four) would be deployed on triage work (e.g. fulfilling the advice duty, determining whether an application for assistance is being made and if so whether the application should be taken).

To make sure that officers are able to competently practice all aspects of homelessness law, many local authorities rotate offices across different aspects of the service, with the area of responsibility they are deployed to changing every 6 to 12 months. Often, local authorities will ask casework officers to develop specialisms in specific types of casework, particularly those where people are more likely to experience homelessness, such as:

- People released from prison or use attention
- Care levers
- Former members of the regular armed forces
- Victims of domestic abuse
- Person leaving hospital
- Person suffering from a mental illness or impairment
- Any other group that are at particular risk of homelessness

In some areas, these posts are funded in addition to the core casework officers, from revenue Grant made available by National government, or regional and local public bodies that have an interest in assisting the various groups of people listed above.

In addition to having sufficient numbers of casework offices, The LGA recommend that each local authority has a specific post who is responsible for overseeing the local homelessness strategy. This role is vital to ensuring the strategy action plan is delivered fully and on time. It recognises that the skills associated with strategic enabling work are different to those needed for operational casework.

When taking account of the number of households in temporary accommodation at April 2024, a further 12 officers would be required to oversee the administration of temporary accommodation functions. This in turn would necessitate one or two team leaders.

Based on the number of people reported as sleeping rough in April 2024, at least one post would be required to provide assistance to rough sleepers in the local authority area.

Further number of officers would be required to administer housing allocation functions, primarily managing applications to join the housing waiting list, and making offers of accommodation. The local government ombudsman has previously advised that local authorities should complete assessment of an application to join housing way less within six weeks of an application being received. This timeframe should be used to calculate the total number of staff required to administer housing application functions. Based on and indicative analysis of housing waiting list numbers available from the council, approximately nine employees would be required to administer housing allocation casework, plus one team leader. A more thorough analysis of allocations and lettings caseload would need to be done to determine an exact number.

There is a common perception that the complexities and responsibilities associated with housing allocation casework are lighter than that of homelessness casework. This perception leads to many local authorities employing not enough housing allocation caseworkers and often employing them on a lower salary than that of homelessness caseworkers. This leads to backlogs in decision-making and higher than necessary staff turnover. The truth is, both housing allocation and homelessness case officer's have the same set of responsibilities. Both required to provide advice, both are required to assess housing needs of a person and their household, both are required to understand how an array of vulnerabilities will affect the housing options of an individual, both are required to determine whether a person is eligible for housing assistance using the same statutory framework, decisions made by both types of offices have the same legal consequences and culpability. Therefore, the only logical conclusion is that housing allocation officers should be enumerated at the same rate as homelessness officers.

In summary, taking account of all the information above, a possible staffing structure for Flintshire Council might look something like this:

- Ix Head of Service
- 5x team leaders

- 24x homelessness caseworkers
- 6x specialist officers
- Ix rough sleeper officer
- Ix strategy officer
- 9x housing allocation caseworkers

The proposed new staffing structure devised by the Council aligns close enough with what is set out above.

#### Feedback from staff

Feedback from officers in the homelessness service at a workshop conduced for the review and through individual conversations brought out a number of important points.

- Overall, there was a good sense of teamwork within the service, with staff feeling supported by management and being supportive of each other.
- This extended to working constructively with other parts of the council and other agencies, and understanding the pressures other services were under even though there were a number of examples given of where better joint working would be helpful.
- Officers working in the service for over a decade reported that the service is the busiest it has ever been. Caseloads are sometimes 70+ per officer when 25 to 35 would be more manageable.
- The number of presentations and assessments has increased markedly. This is backed up by the data in the council's end of year performance report, which shows the number of presentations to the homelessness service increasing by 25% from 1,598 in 2022/23 to 2,005 in 2023/24, and the number of presentations progressing to a S62 homelessness assessment rose by 40% from 911 in 2022/23 to 1,274 in 2023/24.
- There was agreement that the number of people approaching the council for homelessness assistance with high or complex support needs had increased, with mental health being a particular issue.
- Although co-operation and joint working with other services is good, there are more people who are not getting support elsewhere, and the homelessness service is left to provide support as they have a statutory duty to offer accommodation, and this cannot be successfully achieved in many cases without addressing other issues.

- Particular issues mentioned where cases where individuals were transitioning from children's social services without a good enough plan and where people are being discharged from hospital without accommodation to move to without a proper plan.
- The Renting Homes Wales Act<sup>3</sup> was also felt to have caused an increase in the number of evictions from the private rented sector in advance of its provisions coming fully not force.
- Staff felt that their ability to engage in effective homelessness prevention work was hindered by the amount of time spent dealing with emergencies, often associated with a relatedly small number of people with high needs. This could mean that staff simply don't have enough time to work on S66 prevention cases.
- It was also felt by some officers that not all service users want to have their homelessness prevented, as they may see being accepted as homeless as a route to a council flat. This is partly an out-of-date notion, but also has some truth to it as more and more social housing is let to homeless households to reduce the financial pressures on the council.
- It was felt that positive change was going on in the service, through improved training, a problem-solving approach to find the right solutions for individuals, and through customer journey mapping.
- We were told about a number of examples of people who were hard to help where the councils had been flexible and gone out of its way to assist to find a solution that worked. This was a source of pride within the service and was felt to be an approach actively supported by senior officers.
- It was felt that more could be done using social media and other avenues to help people access services earlier, and to help themselves more effectively, which could reduce the need to accommodate people in an emergency, often in B&B and often outside Flintshire.
- The part of the service working with prison and probation service to assist exoffenders leaving custody was believed to be effective although hampered by the lack of accommodation options available.
- The team would welcome having specialist workers on mental health and substance misuse embedded in the team. There was a feeling that staff were having to deal with support for people with high needs, but without having the necessary expertise.

<sup>&</sup>lt;sup>3</sup> https://www.legislation.gov.uk/anaw/2016/1/contents

- Although far more hotels are being used, in many cases outside Flintshire, regular visiting support is provided by officers. However, because resources are stretched it can be difficult to provide a good service, especially if there is a lack of cover due to sickness absence.
- Some officers felt more could be done to make use of PRS accommodation, but this would need work and dedicated resource to build relationships with the sector.
- A number of people called for a clearer plan to improve things, with a sense that lots of things get talked about but are not necessarily delivered. The restructure was cited as an example of this, as it appears this has been promised for a long time as a way of alleviating pressure on the service, but has still not happened.

# Access to the service

The Flintshire Council website has a section on 'homeless or at risk of homelessness4'.

This sets out a summary of how the 'homeless team' can help followed by answers to frequently asked questions:

- I've received notice from my landlord
- I'm struggling to pay my rent
- I'm struggling to pay my mortgage
- My relationship has broken down and my partner is asking me to leave
- I want to leave my partner as I do not feel safe
- I want to leave my home or my family/relatives have asked me to leave
- I'm experiencing harassment from my neighbour / landlord

There is also a link to Streetlink, the Housing Support Programme strategy and explanations of the various duties in the Housing (Wales) Act 2014.

The telephone numbers of the 'Homeless' team and the out of hours service are clearly available and readers are encouraged to contact the service by phone as soon as possible. Links to Shelter and the Citizens Advice are also displayed.

Although the website text is clear and contains relevant information, in our view it has some flaws:

<sup>&</sup>lt;sup>4</sup> https://www.flintshire.gov.uk/en/Resident/Housing/Housing-and-Prevention/Homeless-or-At-Risk-of-Homelessness.aspx

- The text is aimed at people with quite a high level of literacy and has links to a
  number of complex documents. It is not clear that it would be very accessible to the
  average service user. An example of well written housing advice information can be
  found at AdviceAid, whose content and materials are tailored to satisfy government
  standards around clarity and usability. For further information about advice, clicking
  here. AdviceAid materials are used by local authorities throughout England, for an
  example, these are being used by Shropshire Council, clicking on the following link
  here.
- Much of the text is framed in the language of homelessness and the council's offer under the homelessness legislation rather than around housing advice and housing options, short of applying as homeless.
- There are no step-by-step routes to potential solutions online.
- Also, there does not appear to be communication around housing advice and housing options available on social media. This is a gap, especially considering that 35% of those in temporary accommodation are aged under 35. Voluntary organisations often make very effective use of social media, to promote their campaigns and target information to specific audiences. Examples of marketing campaigns and videos used by the End Youth Homelessness can be found by clicking <u>here</u>.

# **Policies/procedures**

We were given access to a number of policies and procedures and the Council's standard homelessness decision letters. We were also shown a template personal housing plan (PHP) for those assessed as being owed a homelessness duty.

The Council recognises that work is needed to improve the comprehensiveness of its procedures and there is considerable work going on to develop or update these.

We were shown the following:

- Draft Domestic Abuse procedure
- Draft Family and Friends Evicting procedure
- Draft Personal Housing Plan procedure
- Draft Renting Homes Act Notices procedure
- Draft S85 Review procedure
- Final Assessment procedure
- Final Duty Day procedure
- Final Out of Hours procedure

Homelessness Accommodation Policy

These generally seemed clear and appropriate. However, they are in a traditional descriptive format and lack flow charts, decision trees, or checklists, which would be helpful to ensure they are followed in practice. There is an opportunity to make better use of IT to integrate these procedures into standard workflows.

There are a number of procedures which it would be beneficial for the service to have, which do not appear to exist. These include, notably:

- A temporary accommodation procurement policy
- A temporary accommodation placement policy

We also felt that the current PHP template could be improved to have a greater emphasis on homelessness prevention and relief options.

We note that one of the goals of the Council's rapid rehousing plan is to develop a comprehensive homelessness prevention toolkit. When complete, this should be referenced and incorporated into PHP guidance, preferably as part of the IT casework system, to ensure that viable prevention and relief options are followed.

There is also scope to make better use of existing resources to improve processes and procedures. An example of this is the Welsh government approved youth homelessness positive pathway guidance<sup>5</sup>, which sets out good practice for both housing and children's services, working together in 5 service areas:

- Information and advice for all young people and families
- Targeted early intervention
- Integrated response ('hub' or 'virtual hub') and gateway to commissioned accommodation and support
- Commissioned accommodation and support
- Range of Housing Options

Whilst this would need adaptation for Flintshire and may be challenging to implement fully, it provides a good basis for what an appropriate service should look like, without having to go back to first principles.

# Data and IT

<sup>&</sup>lt;sup>5</sup> https://www.gov.wales/sites/default/files/publications/2019-03/positive-pathway-guidance-and-good-practice.pdf

The Council's data system is in the process of development in house, with an ambition to link different areas of activity across one system and for this to generate regular dashboard reports and to support and monitor casework across a number of activities, not just homelessness.

This is a work in progress, with the current system having improved markedly over the past year, but with a lot of functionality still to develop.

This means that currently the ability to keep track of service outputs and casework through the IT system is limited.

There are pros and cons to developing an in-house system. Positive aspects include that the system can, in principle, be tailored to Flintshire's specific requirements, and can be adapted and modified more flexibly than if changes need to requested from an external supplier. There may also be reductions in cost compared to buying an off the shelf system, although we were not able to analyse this.

On the other hand, it is taking some time to make the system fit for purpose, when off the shelf systems delivering most if not all of Flintshire's are available to purchase. We also noted that development of the system is reliant on one specialist working within the Council, and that that individual is working on a number of projects for the council in parallel, so that the homelessness IT system development has to compete with other priorities.

Overall, the reporting capacity of the system which would allow real time tracking of the performance of the system, including numbers in TA and costs, currently seems limited.

The system also currently lacks capacity to prompt appropriate casework activity and monitor whether it has been carried out. This is one of the areas currently under development.

# **Temporary Accommodation**

As already discussed, perhaps the biggest problem the service has is the lack of suitable accommodation available, with the biggest shortfalls being for single person households and for larger families.

This is the case for both settled accommodation and temporary accommodation.

At the end of April 2024, Flintshire had 292 households in temporary accommodation, up by 54% from 190 a year earlier.

Of those 292 households, 191 were in hotels, up 103% from a year earlier. 15 were in holiday accommodation placements, and 11 were in Mostyn Lodge a privately owned B&B.

These are all recognised by the Council as emergency accommodation placements which are not suitable for long stays, with many of the hotels outside Flintshire in areas such as Rhyl and Chester. Some accommodation is in areas which are isolated for any households without a car, such as hotels along the A55.

In addition to this, 23 single people were in the Glanrafon homelessness hub, which is supported accommodation with support commissioned from the Wallich using individual Bunkabin portacabins and a central office and communal space. This is mostly used for people with support needs, and despite the challenges of the accommodation site, appears to be well managed and to meet the short term needs of those accommodated there.

Another 20 households live in council owned stock, some of which has been bought and converted to TA use with the help of Welsh Government Transitional Accommodation Capital Programme (TACP) funding.

Based on accommodation we saw on our visit, much of this accommodation is of a high standard and the Council has been innovative in buying and converting buildings such as old pubs.

A further 32 households live in accommodation which has been leased by the council.

As shown above in Figure 1, although the number of households placed in owned and leased TA has grown by 30% in percentage terms over the 12 months between April 2023 and April 2024, from 40 households to 52 households, this growth has not in any way kept pace with the increasing number of households the Council has needed to accommodate, with the difference being taken up by the use of more hotels.

The reasons for this boils down to the fact that more people are moving into TA than are able to move out into settled accommodation, and it has not been possible for the Council to find alternative TA other than hotels and some holiday accommodation placements to meet this need.

# Settled accommodation supply

## Existing social housing

The 2021 Census shows that 14.5% of households in Flintshire live in social rented accommodation, the 13<sup>th</sup> highest proportion in Wales out of 22 local authorities. 13.3% of households live in the private rented sector, the second lowest proportion in Wales.

There are 9,919 social rented homes in Flintshire<sup>6</sup> of which 7,312 are owned by the council and 2,607 are owned by housing associations.

Of these 9,919 homes, 10% are non-sheltered 1-beds<sup>7</sup> and studios and just 2% are 4-bed accommodation or larger.

This compares to 34% of housing register demand being for 1-bed non-sheltered accommodation and 8% of demand being for 4-bed accommodation or larger.

In terms of the demand from households owed a homelessness duty, approximately 75% of demand is for 1-bed general needs accommodation, including 35% for 1-bed accommodation for people aged under 35.

The number of social lettings in Flintshire was 539 in  $2023/24^8$ , down by almost 28% over a five-year period.

Lettings to both council and housing association properties are allocated through the Single Access Route To Housing Partnership (SARTH) covering Flintshire, Conwy and Denbighshire.

However, since the Covid pandemic 50% of social lettings across all partners are intended to be let as direct offers to homeless households nominated by the council.

Although this policy is still in place only around 20% of lettings in Flintshire were made through a direct homelessness offer in 2023/24.

We are informed that this is not due to unwillingness by the SARTH partners, but is because of the shortage of lettings of I-bed general needs accommodation.

Flintshire Council data suggests that 72 S73 relief and S75 full duties were ended in the social rented sector in 2023/24.

This is simply not enough to meet demand.

A review of the SARTH allocations process across the partnership is about to be commissioned.

<sup>&</sup>lt;sup>6</sup> Based on information from the Flintshire Rapid Rehousing Transition Plan

<sup>&</sup>lt;sup>7</sup> Including 23 studios

<sup>&</sup>lt;sup>8</sup> Based on data up to the end of Q3 2023/24

## Voids

An important contributory factor to the lack of settled accommodation to meet homelessness demand is the number of void properties.

At the beginning of May 2024 there were 262 council voids. 94 of these were 1-beds, 100 2-beds, 64 3-beds and only 4 properties 4-bed or above.

Void levels appear to have been roughly steady over 2023/24 after rising steadily from about half that number in 2020/21

If more voids could be let, it might make a significant contribution to reducing the number of households in TA.

However, around half the current 262 voids are for sheltered properties and we understand that the improved Welsh government standards for social housing lets, are adding to the complexity and costs of void works, making it hard to radically decrease void numbers.

We were also informed that there are significant issues arising from the delay between void properties being allocated to households needing accommodation and the property becoming ready to let. Analysis of council properties which are currently void shows that on average they have been void for 154 days, with this rising to 266 days for sheltered flats. This indicates that the average time between a property becoming void and being let is considerably longer than this.

This issue was presented as a barrier to timely move on from temporary accommodation, including for families even though there should in principle be enough lets of family sized accommodation to avoid families having to be in temporary accommodation for long periods.

If it were possible to halve the number of council voids in one year and if half of those additional lettings were to go to homeless households, this would deliver around an additional 65 lets to homeless households. Whilst this would make a contribution to reducing the growth in the numbers in emergency accommodation (which grew by 93 in 2023/24) it would not be sufficient to halt that growth.

## New social housing development

The Flintshire Housing Needs Prospectus was amended in August 2023 and explicitly recognises the need for more one-bed accommodation to meet homelessness demand as well as specialist housing provision, including wheel chair adapted and larger properties,

supported housing for specific client groups and a new homelessness temporary accommodation hub.

The current housing Programme Delivery Plan (PDP), which in theory covers the next three years, but which we were informed is likely to take five years to deliver in practice, includes 363 social homes, of which 100 are one-beds, 164 two-beds, 81 three-beds and 18 four-beds or larger.

Despite the recognition in the prospectus that one-beds represent the highest demand, the majority of properties in the development pipeline are family homes, with an average of only 20 one-beds per year (based on five-year delivery) being planned. This is partly because many of the proposed developments in the PDP were commissioned before the current homelessness crisis.

Whilst this new housing supply is clearly positive, it seems clear that it can only make a small contribution to meeting homelessness demand.

The Council has made active use of Welsh Government Transitional Accommodation Capital Funding Programme (TACP) to buy and refurbish properties such as old pubs for use as high quality TA.

## Private rented accommodation

In terms of opportunities to prevent and relieve more homelessness into PRS accommodation, the Council commissioned a report from arc4 in 2022 reviewing the private rented market across Flintshire, which was updated in August 2023.

This report analysed Zoopla data on PRS accommodation and found that across Flintshire only 6.75% of properties advertised for rent between 2018 and 2023 were available at Local Housing Allowance (LHA) rates, with 33% of properties available at LHA + 10%.

Zoopla lettings may not reflect all available lettings at the lower end of the market, and the report also shows that in some areas of the county, such as Flint, a significantly higher proportion of properties are available at LHA and LHA +10% levels. Nevertheless, overall, this shows a very constrained situation on PRS affordability.

In addition to the lack of affordability at LHA level rents prior to April 2024 (when LHA was increased), the number of properties to let has also decreased markedly. According to arc4's analysis, the total number of PRS properties recorded as available to let on Zoopla fell from 798 in 2019 to 329 in 2022 and 157 in the first six months of 2023.

This reduction may be due to a combination of factors including rising mortgage interest rates and the impact of Rent Smart Wales<sup>9</sup>.

In addition to the reduced number of lets and the low percentage of properties available at LHA rents, only around 15% of properties coming onto the market through Zoopla are one-bed flats or houses, whereas Flintshire's homelessness demand is mainly for households with a one-bed requirement, as described above.

Taken at face value this indicates that prior to April 2024 only around 35 one-bed properties were coming into the market at LHA rents per year<sup>10</sup> in Flintshire.

However, this ignores properties not advertised on Zoopla and also ignores houses in multiple occupation (HMOs), of which there are around 350 such houses according to the Flintshire Housing Strategy 2019/24.

It also does not take into account the rise in the LHA rates in April 2024 to at least notionally reflect 30<sup>th</sup> percentile rents. The changes to LHA rates from April 2024<sup>11</sup> are shown in Figure 4.

Flintshire BRMA	Weekly LHA Apr 2023 to Mar 2024	Weekly LHA Apr 2023 to Mar 2024	Weekly increase £	Weekly % increase
Shared Accommodation	£87.50	£87.50	£0.00	0%
l bedroom	£92.05	£103.56	£11.51	13%
2 bedroom	£120.82	£136.93	£16.11	13%
3 bedroom	£136.93	£159.95	£23.02	17%
4 bedroom	£184.11	£212.88	£28.77	16%

Figure 4.

This shows a 13% increase in LHA rates for 1-bed and 2-bed properties and slightly larger increases for 3 and 4 bed properties.

Although the number of properties, and especially 1-bed properties, available at LHA rents is still likely to be small, the difference between median monthly rents in Flintshire reported by arc4 as  $\pounds$ 185 pw across all property sizes between January and June 2023 and the cost of hotel accommodation at around  $\pounds$ 700 per week or more is very significant.

This suggests that options to make more use of private rented sector accommodation could be cost effective for Flintshire.

<sup>&</sup>lt;sup>9</sup> https://rentsmart.gov.wales/en/home/

<sup>&</sup>lt;sup>10</sup> 329 total listings in 2022 x 15% 1-beds x 6.75% at LHA = 33.1

<sup>&</sup>lt;sup>II</sup> https://www.gov.wales/local-housing-allowance-lha-rates-april-2024-march-2025

# Work with other agencies/ departments

As part of the review, we spoke to a number of officers working in other parts on the Council, external stakeholders including Shelter, Citizens Advice, probation, substance misuse services, the Wallich, and housing associations with stock in Flintshire.

We also attended a meeting of the Partnership and protocols delivery subgroup of the Flintshire ending homelessness board, and a focus group of external partners.

The feedback from external partners about working with Flintshire's homelessness and housing advice service was extremely positive, with more than one agency saying that Flintshire is the best council in North Wales in terms of positive engagement with the homelessness service.

Positive features which were highlighted included:

- Colocation with Shelter in the housing options office, with Shelter playing a specific role in providing advice to people facing homelessness in the PRS
- Flintshire being willing to engage in a positive way to find pragmatic and sometimes creative solutions for service users
- Flintshire consistently finding accommodation for people leaving prison and facing homelessness
- The openness of the council to work collaboratively with other organisations

This was contrasted with some neighbouring councils who organisations considered significantly less willing to collaborate with them.

The main negative points raised by external organisations were:

- The difficulties of achieving positive outcomes for clients placed in hotels, especially those outside Flintshire and specifically hotels along the A55 which are very isolated for anyone without a car.
- An unresolved issue with one housing association about the lack of information sharing for ex-offenders referred by Flintshire, which had led to that housing association no longer accepting tenants with offending histories referred by the Council. However, only one housing association highlighted this as a problem.
- The time it can take between acceptance for a council tenancy and the property being ready to move in, which can sometimes be months, when a client who is ready to move on from TA or supported housing but cannot do so.
- The opposite problem where a service user is made an offer of social housing and is expected to move in within days, when this may be very difficult for them e.g. because the property is unfurnished.

Internal Council colleagues were also generally positive about working with the homeless service. Some issues discussed were:

- The need for better and more structured joint working between children's services and homelessness, especially for young adults leaving care but also for young people who were hard to place, and sometimes ended up in very expensive placements which were less than ideal. There was interest in setting up a joint team across children's services and housing to improve this.
- The need for more consistent support for tenants with support needs who moved into council tenancies.

There was also a recognition that both homelessness services and social services are over stretched and need to work together as well as possible to ensure that the council works effectively in partnership to support clients, especially those with high support needs or complex needs, rather than arguing over which service takes responsibility for what.

Resolving these issues is one of the main reasons for the existence of the partnership and protocols group which we attended, although the group was at an early stage at the time of the review.

There was also some evidence of a tension between the need to move more households from TA into social housing, and the difficulties of converting sheltered accommodation to general needs in order to achieve this. A particular issue highlighted was the difficulty in tenants with experience of homelessness and elderly people living next to each other during the period of transition.

# The Council's plans

It is clear from these findings that the Council is facing a number of major issues, which can be summarised as follows:

- I. The number of households in TA is growing rapidly.
- 2. Nearly all this growth is in emergency hotel accommodation. This is both unsuitable and financially unsustainable. Much of the accommodation is outside Flintshire.
- 3. Although most households in hotels are single person households, there are also too many families with children in hotels, even though the supply of settled family accommodation is much better than the supply of settled accommodation for singles.

- 4. There is a very significant lack of accommodation for single people, both in social housing and in the private rented sector. This is a major factor in the growth of TA.
- 5. There is also a lack of TA which is not hotels, so that much too high a proportion of those in TA are in hotels.
- 6. The ability of officers in the homelessness team to reduce the number of people entering TA is limited by a lack of officers, as the team has not grown to match increased demand and the increased number of households in TA.
- 7. The ability of the team to prevent and relieve homelessness is also constrained by an increase in the number of households using the service who have complex needs, and the lack of capacity in other services to meet these needs, leading to much of the teams' time being taken up in dealing with a minority of high needs cases.

The Council is already well aware of these challenges and has set out a number of ways in which to attempt address the issues. These are set out in a number of reports and plans:

## Homelessness Budget Pressure – Options Paper

The Homelessness Budget Pressure - Options Paper agreed in November 2023, sets out the large and growing overspend on emergency accommodation and puts forward a number of options for increasing accommodation supply and mitigate the position, all of which were agreed in principle.

The agreed options are:

<u>Option Ia</u> Progress with the sheltered housing review to develop recommendations for current schemes.

This has the potential to redesignate a proportion of sheltered housing as general needs accommodation, which could be used to house homeless households

<u>Option 1b</u> - Reduce or remove the age thresholds for mini-group properties which is currently 50 years plus

This could allow the use of some or all current sheltered mini-group homes to be let to homeless households in TA. Around 40 units of this accommodation are let per year, but there are potential issues mixing this client group with older people

<u>Option 2a</u> - Replicate Glanrafon Homeless Hub in another location with use of modular accommodation modules

<u>Option 2b</u> - Replicate Glanrafon Homeless Hub through purchase of a large building or development of purpose-built accommodation

<u>Option 3a</u> - Increase SARTH Homeless Direct Lets quota from 50% to 100% This option has the problem that current 50 % quota is not being met and that it would not increase the number of 1-bed units available to let. Based on discussion as part of this review, it is also likely to meet resistance from at least some of the SARTH partners.

<u>Option 3b</u> - Place a temporary hold on non-urgent moves for social housing applicants via the Common Housing Register.

<u>Option 3c</u> - Allocate two-bedroom Council housing to people who are homeless, have a one bedroom need and do not qualify for sheltered accommodation.

This option would require a top up from the Council for anyone receiving housing benefits. The top up would be far smaller than the cost of hotel accommodation but would continue indefinitely.

<u>Option 4a</u> - Take more Council housing from HRA to use as temporary accommodation and create house shares for single people.

Option 5a - Improve the private sector leasing scheme offer to attract more landlords

This would increase the costs of the scheme but by far less than the costs of hotel accommodation. There may also be options to let this accommodation at enhanced rates of housing benefit if it is used for single people with support needs, which could reduce costs considerably.

Option 5b - Target long-term empty properties for Council Lease Scheme

<u>Option 5c</u> - Offer enhanced landlord incentives to end homelessness duties in the private rented sector

This option may however be restricted by the number of 1-bed properties to rent, as discussed above in relation to the arc4 analysis

Option 5d - Exploring the use of a Rent Guarantee Scheme

This fulfils a similar purpose to option 5c, and is also constrained by the available supply.

Although exploration of all these options has been agreed, it appears that in most cases that they have not been explored far enough to produce quantified and costed options which can be rapidly progressed.

This is essential if the use of emergency accommodation is to be reduced.

It is evident that there are complications in converting sheltered accommodation to general needs use in the short term at scale and the options to replicate Glanrafon homeless hub will take time to bring to fruition.

However, there are good options here, which could be progressed quickly. Although they all have down sides and do not solve the fundamental problem of homelessness demand being greater than the supply of affordable settled one-bed accommodation, options 3c, 4a, and 5a in particular could have the potential to bring about significant reduction in the use of hotel accommodation quite rapidly, if progressed with urgency.

## **Rapid Rehousing Transition Plan**

The Council's Rapid Rehousing Transition Plan (RRTP) 2022 to 2027 has recently been finalised. The plan meets the requirement for all Councils to move away from the provision of TA towards a rapid rehousing model and offers a thorough analysis.

The RRTP sets out five priority objectives:

- PI: Tackling homelessness through robust and effective partnership working
- P2: Remodelling our approaches to data, systems, policies and service delivery
- P3: Ensuring support is available to everyone who needs it
- P4: Transforming our temporary housing offer

P5: Increasing the supply of affordable housing and removing barriers to people accessing affordable housing promptly

Key actions set out in the RRTP include:

- Restructuring the Council's Housing Support and Homelessness Service (as discussed earlier in this report)
- Recruitment of a Rapid Rehousing Strategic Co-ordinator to ensure that the plan is implemented
- Recruitment of a Data analyst

- Development of 'diversionary activities' for residents of TA
- IT improvements including giving partner agencies access to the IT casework system and improving reporting capacity
- Commissioning a housing first provider and increasing housing first capacity
- Join the All Wales Private Sector Leasing Scheme
- Development of a complex needs supported housing project
- Ensuring all staff working within services funded by Flintshire's housing support grant are paid the 'real living wage'

These are only some of a great many actions detailed in the RRTP action plan, the great majority of which are scheduled for completion by the end of 2024.

Although the actions in the RRTP action plan appear desirable and well thought through, they look unrealistic within the timescale set out in the action plan. This is especially the case as the Rapid Rehousing Strategic Co-ordinator is yet to be recruited, and there is very limited existing strategic capacity within the service.

## **Ending Homelessness Board**

The Council has recently set up an Ending Homelessness Board to oversee the delivery of the RRTP in Flintshire and provide strategic direction and corporate and multi-agency commitments to ending homelessness.

The board's membership is comprised of senior officers from across the Council, including Housing and Communities; Planning, Environment and the Economy; Governance; Streetscene and Transportation; Corporate Finance; Social Services; Education and Youth; People and Organisational Development.

The board has a number of subgroups reporting to it covering the areas of Communications and Engagement; Homeless Options Delivery; Processes and Protocols; Commissioning & Planning.

In principle, the board and its subgroups should provide an excellent resource to ensure that the whole council is working to implement the RRTP in a co-ordinated way.

We were not in a position by the end of the review to make an assessment of how well this is working on practice.

# Conclusions

Flintshire County Council, like other local authorities in Wales is facing increasing homelessness pressures. This is partly due to a combination of more homelessness due to acute shortage of affordable accommodation, increased evictions from the private rented sector, declining social lettings and the continuing cost of living crisis.

But this is only part of the picture. The legislative and policy landscape has also changed, with the relaxation of priority need rules since Covid meaning that more single people in particular, now meet the criteria for the Council to owe them an accommodation duty. This increased responsibility for councils is only likely to increase in the short to medium term as the Welsh government has signalled a clear intention to follow Scotland and abolish priority need altogether.

Our overall impression of the Flintshire homelessness service is that it is well managed and operates both effectively and compassionately. The service is also well regarded by external partners.

However, this is seriously undermined by the service's increasing reliance on the use of very expensive and unsuitable hotel accommodation, much of it outside Flintshire. This is mostly for single people but, too often, also for families with children. This is both unsustainable financially and likely to lead to poorer outcomes for the households the Council is trying to help.

It is essential that concerted action is taken to reduce this use of hotel accommodation, even if this means making difficult choices and, in some cases, means planned expenditure on a spend to save basis.

There is also potential to improve the service through the planned restructure, through better joint working with households facing homelessness across the council, through improved policies and procedures, and through improved IT.

Better communication is also needed, both to encourage households to seek help earlier, when homelessness is still preventable, and to manage expectations that homelessness assistance will lead to the offer of a 1-bed council or housing association property. There are simply not enough 1-bed social lettings for this to be the case within the foreseeable future.

Our analysis leads to the following main conclusions:

1. The Flintshire Homelessness and housing advice service is well led by Martin Cooil and Vicky Clark, who offer clear leadership and maintain a supportive environment

for staff despite the pressures on the service.

- 2. Morale in the service appears to be good, despite the increased pressures due to rising demand and increased numbers of households in emergency accommodation,
- 3. The service is generally very well regarded by external partners and is considered better than that of many neighbouring authorities in terms of responsiveness and willingness to work in partnership,
- 4. The service appears to be sensitive to the needs of its customers with an emphasis on finding appropriate solutions that match the needs of service users and a willingness to be creative. This approach comes from the top.
- 5. However, there are few structures or mechanisms for the views and feedback of service users to be taken into account in monitoring the effectiveness of the service or in planning future service development,
- 6. Although the service works in partnership with other council departments including adult and children's social services, there is room for improvement and better joint working, especially to improve the approach to working with clients with complex needs and vulnerable young people. An opportunity should be taken to remind partners of the duty to cooperate to tackle homelessness, which covers both strategic and operational homelessness functions, so the expectations are clear amongst all partners.
- 7. There is also scope for improvement in the way the Council communicates to those needing housing advice or facing a risk of homelessness, particularly through greater use of social media.
- 8. The number of households in TA in Flintshire is not exceptional compared to other Welsh authorities but it has been growing faster than most other Welsh authorities recently.
- 9. We have found no evidence that this is due to a softer approach to homelessness than other Welsh authorities. The service is however very strongly opposed to gatekeeping, which is against the letter and the spirit of the Welsh homelessness legislation and guidance.
- 10. The number and proportion of households living in emergency hotel accommodation is much too high and growing rapidly. This is both financially and ethically unsustainable, especially as much of the accommodation is outside Flintshire and geographically isolated for residents without access to a car.

- II. There is scope to do more work to prevent and relieve homelessness without the need to enter TA, to move people out of TA more rapidly and to provide alternative forms of TA to reduce the use of hotels.
- 12. However, the council is hampered in this by the lack of 1-bed accommodation available to let in both social housing and the private rented sector.
- 13. There is scope to reform the way offers of social housing accommodation are made to reduce the time between acceptance of an offer and being able to move in due to delayed void works. This is a particular serious issue when it means families with children are living in hotels while they wait for accommodation to be ready.
- 14. The service is overstretched operationally and also in its capacity to develop and implement effective strategies to mitigate current problems.
- 15. The proposed restructure of the service appears well thought through and should make a significant contribution to service improvement. However, the restructure has taken a long time to bring together and should now be implemented as soon as possible. It's imperative that as soon as possible there is sufficient numbers of staff so that everyone can have a safe caseload level.
- 16. The work the service has been doing to update its policies and procedures and to upgrade its IT system is welcome, but there is much still to be done.
- 17. The recommendations agreed by the Council to increase supply of accommodation and move people out of emergency accommodation could work if implemented with speed at the required scale.
- 18. However, the Council lacks a clear quantified plan to achieve this. This risks creating a sense of drift and delay, with ever increasing costs to the Council as the use of emergency accommodation continue to rise, and difficult choices such as greater use of shared housing, conversion of sheltered accommodation to general needs, and increased use of private rented accommodation for TA and to end homelessness duties, are not made.
- 19. The Council's Rapid Rehousing Transition Plan appears clear and comprehensive. However, the objectives need to be implemented more smartly, with clear prioritisation and timescales to achieve each goal.
- 20. The establishment of the Ending Homelessness Board and its sub-groups bodes well for the adoption of a whole council approach to meeting the objective of the RRTP. It is important that having set up the structure for this that it delivers tangible results.

# Recommendations

The Council is already well aware of much of what has been said in this report and has set out a large number of areas where it wishes to make changes and improvements, notably in the Rapid Rehousing Transition Plan.

It is not the role of the review to critique the RRTP or to reinforce all its recommendations. However, it is clear that the Council is already aware of much of what needs to be done.

These recommendations are therefore limited to a number of key areas, which clearly relate to our conclusions about the service. It is recognised that there is some overlap between these recommendations and what the Council has already decided it wishes to do over the next several years.

## **Recommendation One**

The Council should develop a clear, costed, two-to-three-year model which balances increased use of emergency accommodation against the mitigation measures it intends to adopt to reduce the use of emergency accommodation.

This should include scenarios where demand continues to increase, stays the same or reduces.

It should also include the range of agreed measures 1a to 5d with a clear timetable for implementation of each measure and the expected contribution which each one can make to reducing the use of emergency accommodation.

The costs associated with implementing each measure should be compared to the avoided costs of hotels.

This will allow a planned approach to reducing the use of emergency accommodation. This can be adapted as time goes on depending on actual demand and actual progress in implementing the different measures.

## **Recommendation Two**

The Council should calculate to what extent I-bed self-contained accommodation could be available to meet single homelessness demand in best- and worst-case scenarios.

If there is not enough one-bed accommodation available to meet expected demand then it should plan to increase the use of shared accommodation for single person households to meet the gap, whether in social housing or leased PRS accommodation or HMOs.

## **Recommendation Three**

The Council should examine the potential to make greater use of supported accommodation to meet homelessness demand and the possibilities of claiming enhanced rates of housing benefit associated with supported housing to contribute to the costs. This may be especially relevant where it is necessary to use shared accommodation due to a lack of one-bed supply as described in recommendation two.

The housing benefit regulations allowing under 35s to claim the one-bed LHA rate after a period of three months in supported housing should form part of this consideration.

## **Recommendation Four**

The Council should expedite the sheltered housing review, so that it can be clear how many extra properties will be able to let to homeless households over a defined time period and include these in the model.

## **Recommendation Five**

The Council should implement the planned restructure of the homelessness service with as little further delay as possible.

#### **Recommendation Six**

The Council should consolidate the various plans for the homelessness service including the RRTP into one plan, with a clear timetable and clearly allocated resources to achieve each objective. The implementation of this plan should be monitored closely by the ending homelessness board.

## **Recommendation Seven**

The Council should consider opportunities for better joint working across departments and with external agencies to work with key client groups such as young people leaving care and service users with complex needs.

This should include creating integrated teams where this would be beneficial and avoid the potential for silo working

## **Recommendation Eight**

The Council should review and update its online and other communications related to homelessness and housing advice with the objectives of:

- I. Improving accessibility for services users with limited literacy
- II. Tailoring communications to different groups with different ways of accessing information
- III. Making greater use of social media
- IV. Providing greater opportunities for self help

- V. Encouraging those at risk of homelessness to come forward earlier, when homelessness can still be prevented
- VI. Managing expectations to reflect the current acute shortage of affordable accommodation compared to local housing need

## **Recommendation Nine**

The Council should consider how it can develop greater collaboration with neighbouring local authorities on homelessness.

Areas of cooperation could include:

- I. benchmarking key parameters such as costs of TA, operational caseloads, staffing costs and performance of homelessness prevention and relief
- II. joint commissioning of services where beneficial
- III. joint training and secondments
- IV. co-development of policies and procedures
- V. lobbying of the Welsh government

## **Recommendation Ten**

The Council should develop mechanisms to include the views and feedback of people with lived experience in its processes for appraisal and development of the service, especially where these involve changes to customer facing processes and procedures.

This could include periodic user satisfaction surveys and the establishment of one or more service user focus groups.

The Council could also consider ways to recruit more people with lived experience of homelessness and receiving support into employed roles within the service.

## **Recommendation Eleven**

The Council should consider increasing its strategic and commissioning capacity beyond what is already planned, given the increasing changes from the Welsh government, the large number of actions in the RRTP, the need to increase TA and other accommodation supply, and the need for policy and IT development.



#### HOUSING CONSULTANTS

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## Summary of Recommendations from the Neil Morland & Co. Independent Review of Homeless Services in Flintshire

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It should also include the range of agreed measures as outlined in the Housing Pressures Option Paper (1a to 5d) with a clear timetable for implementation of each measure and the expected contribution which each one can make to reducing the use of emergency accommodation.

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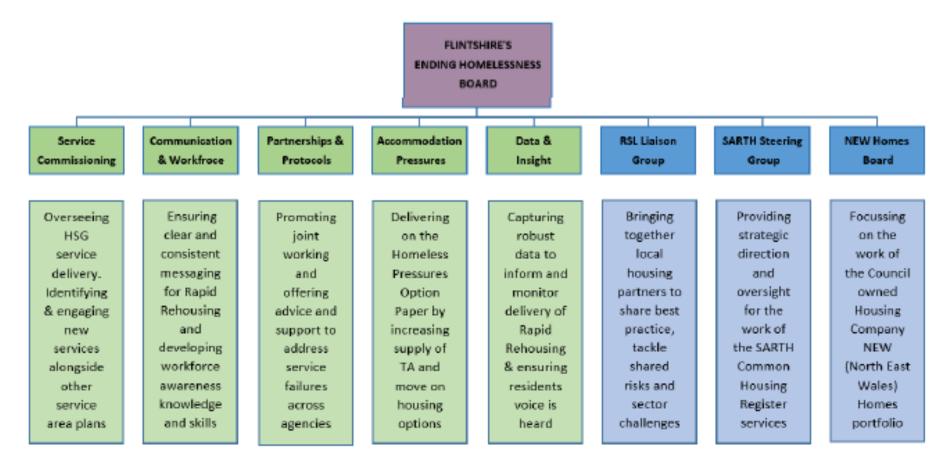
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ENDING HOMELESSNESS BOARD	Responsible for the oversight and successful delivery of the Rapid Rehousing Transition Plan and role out of Rapid Rehousing in Flintshire
DELIVERY GROUPS	Leading on the delivery of specific workstreams and activities outlined within the Action Plan for Rapid Rehousing and accountable to the Ending Homelessness Board
COMPLIMENARY WORK STREAMS	Existing forums that already provide strategic oversight and delivery of services aligned to the Rapid Rehousing Agenda and housing and homelessness in Flintshire

#### Appendix 4: Staffing Structure, Costings and Service Demand Data

#### STAFFING STRUCTURE

The Housing & Prevention Service requires additional staffing to respond to the significant increase in demand for homelessness services and for accommodation. Detailed below is the proposed staff structure, which has been revised on the back of the recommendations of Neil Morland & Co.

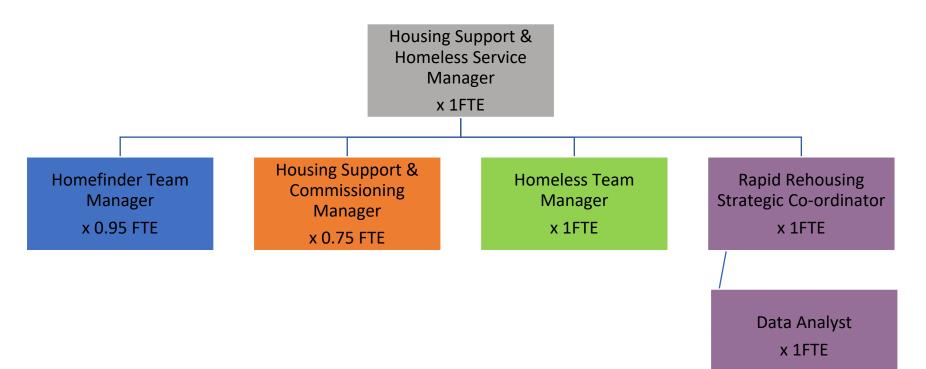
Staffing numbers is increasing from 40.77FTE to 72.46FTE. The increase in staff will enable the following:

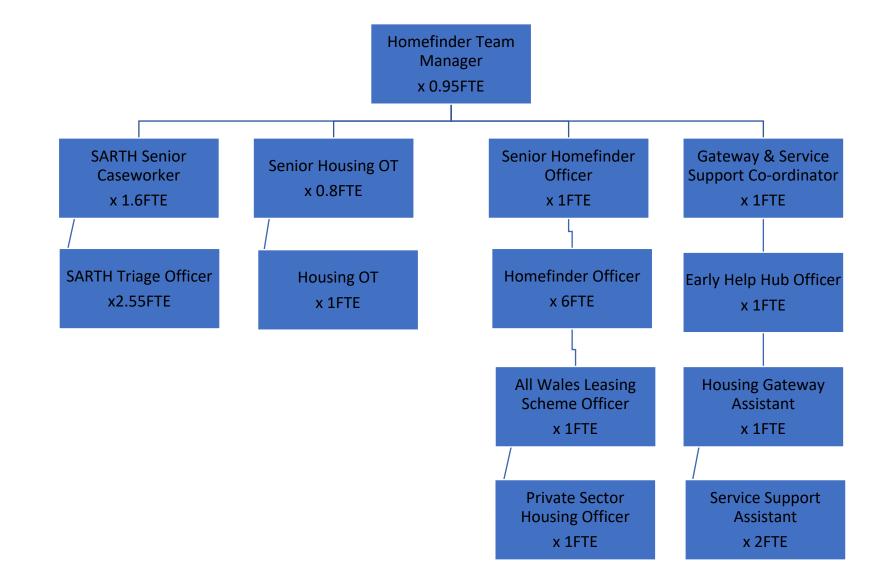
- Additional capacity within the Homeless Team to reduce caseloads and offer better quality of legal compliance on homeless casework, more assistance for residents for prevention of homelessness and improved staff welfare
- Additional capacity for the management of homeless accommodation of all forms. Scope to improve rent collection performance with more staff and tackle poor resident conduct more robustly
- Additional management support for additional staff
- Free up Team Managers to enable them to focus on service improvements
- Deliver additional services such as Diversionary Activities for people experiencing homelessness
- Signing up to the All Wales Leasing Scheme (AWLS)
- Deliver the Rapid Rehousing Transition Plan
- Evidence performance, impact and cost benefit associated with rapid rehousing and homelessness service delivery

The restructure is to be funded through a mixture of grants, Council Fund and contributions from housing partners for management of the Common Housing Register - Single Access Route to Housing(SARTH). The funding gap £396,333 can be met through diversifying the homeless accommodation portfolio and moving away from costly hotels through the interventions outlined in Appendix 5.

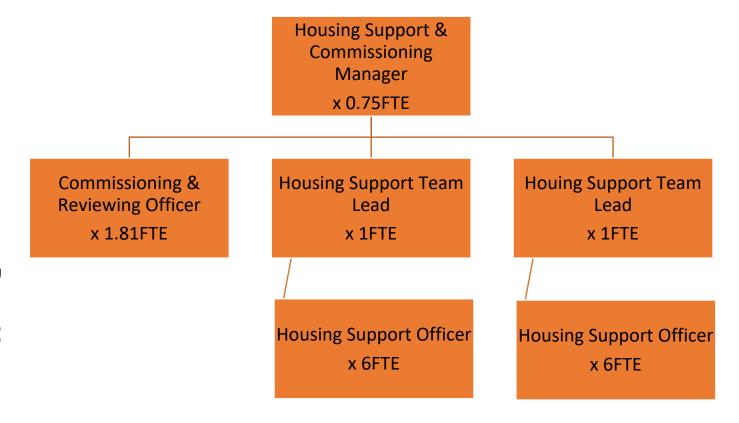
### COSTING FOR SERVICE STRUCTURE

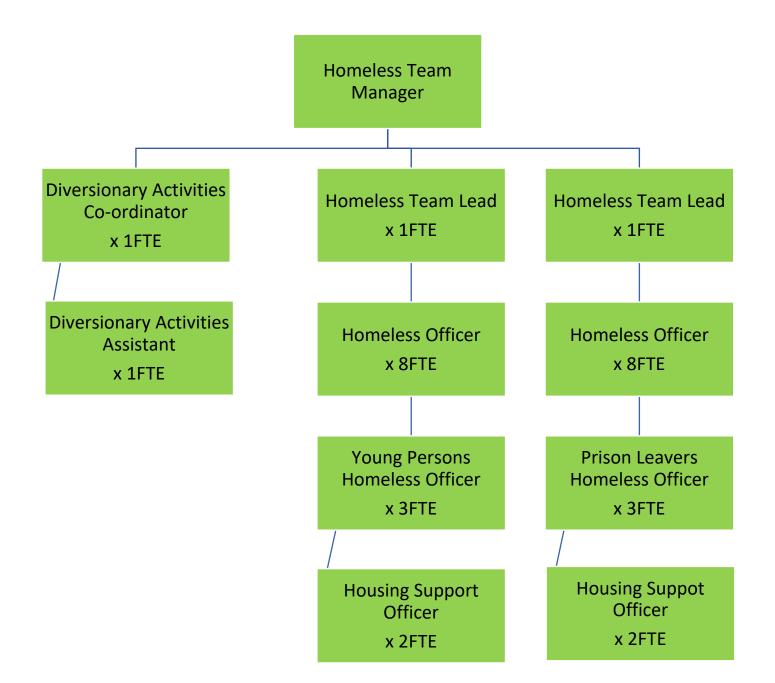
		25.26
CF Budget Net of HSG Income Target	£	1,031,557
Proposed New Structure Costs	£	3,331,994
Shortfall in Funding		2,300,437
Funding Streams to offset Shortfall		
HSG Funding	-£	1,530,162
10% Man Fee on HSG	-£	158,290
Rapid ReHousing	-£	52,739
Sarth Partner	-£	62,062
HRA Contribution	-£	52,739
AWLS Funding	-£	48,111
Total Grant Funding	-£	1,904,104
Shortfall		396,333





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#### SERVICE DEMAND

As previously reported to COT, Scrutiny Committee and Cabinet in recent years, there has been a significant increase in demand for homelessness services. These increases are primarily driven by:

- Failing housing market conditions and challenging private rental sector
- Changes to legislation requiring more people to be owed homeless duties including interim housing duties
- Cost of Living crisis
- Barriers to people moving on and exiting homelessness (lack of social housing and acute shortage of 1 bed general needs properties)

All of the above has led to more people being owed assistance by the Council under Housing Wales Act 2014, with an increased caseload for the Homeless Team and large numbers of people requiring homeless accommodation.

## Homeless Officer Caseloads – All Open Cases

	All Open Homeless Cases
31 <sup>st</sup> March 2022	343
31 <sup>st</sup> March 2023	590
31 <sup>st</sup> March 2024	735



#### Households in Homeless Accommodation

	Households in Homeless Accommodation
31 <sup>st</sup> March 2022	101
31 <sup>st</sup> March 2023	184
31 <sup>st</sup> March 2024	282



#### Appendix 5: Homeless Accommodation VfM

#### Using Council Stock To Meet Homeless Demands

OVERVIEW

The Homeless Department already has access to approx 40 HRA properties (30 self contained properties and 10 house shares)

This table shows the costs associated with 2 people sharing a 3 bed proeprty. This 2 person model means mini HMO licensing is not required. 3 people sharing can be considered in future. A commitment of 10 additional units of lower demand 2 and 3 bed homes is in place from the HRA each year.

The approach will also be explored with our social housing partners.

HRA 3 Bed Properties for 2 person house share model	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
Furnishing and renewals of furnishings	4,000		1,000		1,000		1,000		1,000	
Electric	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Gas	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Water	260	5.0%	273	5.0%	287	5.0%	301	5.0%	316	1,437
WiFi	422	5.0%	443	5.0%	465	5.0%	488	5.0%	512	2,329
Council Tax	1,410	5.0%	1,480	5.0%	1,554	5.0%	1,632	5.0%	1,714	7,790
चीeaning Costs (2hrs pw)	2,086	3.0%	2,148	3.0%	2,213	3.0%	2,279	3.0%	2,347	11,073
ent - £125 pw to HRA	6,375	-	6,375	0.0%	6,375	3.0%	6,566	3.0%	6,763	32,454
Orids - 10%	638		638		638		657		676	3,245
Sepairs-£1400pa - inc annual checks	1,400		1,400		1,400		1,400		1,400	7,000
7	17,789		18,217		18,664		19,342		20,050	94,062
HB Income - Assumed 70% collection rate	- 5,783		- 5,783		- 5,783		- 5,783		- 5,783	- 28,917
Service Charge Income £30 - Assumed 70% collection rate	- 2,142		- 2,142		- 2,142		- 2,142		- 2,142	- 10,710
Cost to FCC	9,864		10,291		10,738		11,417		12,124	54,435
B&B cost (assumed rate of £90 pn)	65,700	5.0%	68,985	5.0%	72,434	5.0%	76,056	5.0%	79,859	363,034
Potential Efficincies to Council per unit (2 people)	- 55,836		- 58,694		- 61,696		- 64,639		- 67,735	- 308,599
Potential Efficiencies fir 10 House Shares (20 people)	- 558,359.70		- 586,938.36		-616,958.46		- 646,389		-677,345.81	- 3,085,991.02

## Aquiring Additional Properties Through TACP Grant Funding

#### OVERVIEW

Welsh Government have provided significant funding to increase housing supply for use as homeless accommodation or social housing to releive homelessness Flintshire have been awarded a indicative award of £2,943,208 for 24/25.

There is potential for additional funding to be made available in year and in future years via TACP

This table shows the costs associated with 2 people sharing a property aquired thorugh the TACP grant. This 2 person model means mini HMO licensing is not required.

A minimum of 10 properties and potentially more will be used to provide homeless accommodation

Those properties not used for homeless accommodation will be prioritised for people who are homeless or at risk of homelessness to ease pressures on homeless accommodation.

TACP properties to be used as 2 person house shares	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
Furnishing and renewals of furnishings	4,000		1,000		1,000		1,000		1,000	
Electric	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Gas	2,600	5.0%	2,730	5.0%	2,867	5.0%	3,010	5.0%	3,160	14,367
Water	260	5.0%	273	5.0%	287	5.0%	301	5.0%	316	1,437
<del>W</del> iFi	422	5.0%	443	5.0%	465	5.0%	488	5.0%	512	2,329
Obuncil Tax	1,410	5.0%	1,480	5.0%	1,554	5.0%	1,632	5.0%	1,714	7,790
eaning Costs (2hrs pw)	2,086	3.0%	2,148	3.0%	2,213	3.0%	2,279	3.0%	2,347	11,073
Sent - £125 pw to HRA	6,375	-	6,375	0.0%	6,375	3.0%	6,566	3.0%	6,763	32,454
99ids - 10%	638		638		638		657		676	3,245
Repairs-£1400pa - inc annual checks	1,400		1,400		1,400		1,400		1,400	7,000
	17,789		18,217		18,664		19,342		20,050	94,062
HB Income - Assumed 70% collection rate	- 5,783		- 5,783		- 5,783		- 5,783		- 5,783	- 28,917
Service Charge Income £30 - Assumed 70% collection	- 2,142		- 2,142		- 2,142		- 2,142		- 2,142	- 10,710
Cost to FCC	9,864		10,291		10,738		11,417		12,124	54,435
B&B cost (assumed rate of £90 pn)	65,700	5.0%	68,985	5.0%	72,434	5.0%	76,056	5.0%	79,859	363,034
Potential Efficincies to Council per unit (2 people)	- 55,836		- 58,694		- 61,696		- 64,639		- 67,735	- 308,599
Potential Efficiencies for 10 House Shares (20 people)	- 558,359.70		- 586,938.36		- 616,958.46		- 646,389		- 677,345.81	-3,085,991

#### 9 Room HMO - Leased Option

OVERVIEW

This property is to be taken onto the Council Lease Scheme for use as homeless accommodation from 1st September 2024.

It will provide much needed housing for 9 single males who are currently in hotels

Property has been signed off as compliant by Housing Enforcement but to enhance health & safety compliance we are installing a sprinkler system and CCTV

The property owner is a developer who is eager to buy housing in Flintshire for potential use by the Council to meet current homeless accommodation pressures.

	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
Cost to Install Sprinkler System & CCTV	12,000									
Ongoing maintenance costs outstide of annual checks	9,000	5.0%	9,450	5.0%	9,923	5.0%	10,419	5.0%	10,940	49,731
Electric	2,924	5.0%	3,070	5.0%	3,224	5.0%	3,385	5.0%	3,554	16,157
Gas	3,670	5.0%	3,854	5.0%	4,046	5.0%	4,248	5.0%	4,461	20,279
Water	995	5.0%	1,045	5.0%	1,097	5.0%	1,152	5.0%	1,209	5,497
WiFi	422	5.0%	443	5.0%	465	5.0%	488	5.0%	512	2,329
Council Tax	3,240	5.0%	3,402	5.0%	3,572	5.0%	3,751	5.0%	3,938	17,903
Cleaning Costs	4,700	3.0%	4,841	3.0%	4,986	3.0%	5,136	3.0%	5,290	24,953
Rent	45,900	-	45,900	0.0%	45,900	3.0%	47,277	3.0%	48,695	233,672
<b>vo</b> jds - 5%	2,295		2,295		2,295		2,364		2,435	11,684
$\mathbf{O}$	85,145		74,299		75,507		78,219		81,034	394,205
B Income - Assumed 70% collection rate	- 26,536		- 26,536		- 26,536		- 26,536		- 26,536	- 132,678
Service Charge Income £30 - Assumed 70% collection rate	- 9,828		- 9,828		- 9,828		- 9,828		- 9,828	- 49,140
Ost to FCC	48,782		37,935		39,144		41,855		44,671	212,387
B and B cost (assumed rate of £90 pn)	295,650	5.0%	310,433	5.0%	325,954	5.0%	342,252	5.0%	359,364	1,633,653
Potential Saving to Council	- 246,868		- 272,497		- 286,810		- 300,396		- 314,694	- 1,421,266

#### Purchasing Enhanced Temporary Housing On Block Booking Arrangement OVERVIEW

We are currently in discussions with a company based in South Wales but looking to work in North Wales. The company delivers temporary accommodation services for 11 Welsh Las already. The model is an intensive housing solution for homeless people and households and offers a 24/7 management and support service.

Contract and procurement advice is being undertaken for a 5 year contract period and due diligence has proven that the company and service comes highly recommended by Welsh Council peers. The company buy up and refurbish properties and will target areas at request and also focus on long term empty homes to bring them back into use.

There are approx 100 households placed in out of county hotels and the focus of this housing solution will be on bringing people back in county

	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
40 X Single bed accommodation										
Annual Charge - £50 pn x 40 Single units	730,000	3.0%	751,900	3.0%	774,457	3.0%	797,691	3.0%	821,621	3,875,669
Annual Charge - £100 pn x 5 x 2 bed House	182,500	3.0%	187,975	3.0%	193,614	3.0%	199,423	3.0%	205,405	968,917
Annual Charge - £100 pn x 3 x 3 bed House	109,500	3.0%	112,785	3.0%	116,169	3.0%	119,654	3.0%	123,243	581,350
Annual Charge - £100 pn x 2 x 4 bed House	73,000	3.0%	75,190	3.0%	77,446	3.0%	79,769	3.0%	82,162	387,567
	1,095,000		1,127,850		1,161,686		1,196,536		1,232,432	5,813,504
HB Income - Assumed 70% collection rate	- 120,816		- 120,816		- 120,816		- 120,816		- 120,816	- 604,080
ထားt to FCC က	974,184		1,007,034		1,040,869		1,075,720		1,111,616	- 5,209,424
and B cost (assumed single rate of £90 pn, family rate of £140 pn)	1,825,000	5.0%	1,916,250	5.0%	2,012,063	5.0%	2,112,666	5.0%	2,218,299	10,084,277
Potential Saving to Council	- 850,816		- 909,216		- 971,193		- 1,036,946		- 1,106,683	- 4,874,853
ŏ										

## Block Booking Local Hotel for Exclusive Use as Homeless Accommodation

#### OVERVIEW:

There are ongoing discussions with a local hotel for the Council to secure excusive use of the hotel for homeless households.

A nightly rate of £65 has been negotiated to include bed and breakfast.

Exclusive use of the hotel provides greater opportunity to "parachute" in services that people experiencing homelessness require and reduces risk to other guests

There are approx 100 households placed in out of county hotels and the focus of this housing solution will be on bringing people back in county

	Year 1	Inflation estimate	Year 2	Inflation estimate	Year 3	Inflation estimate	Year 4	Inflation estimate	Year 5	Over 5 year lease
38 x Single bed accommodation										
Annual Charge - £65 pn x 38 Single units	901,550	3.0%	928,597	3.0%	956,454	3.0%	985,148	3.0%	1,014,702	4,786,451
Security costs £130,000 pa	130,000	3.0%	133,900	3.0%	137,917	3.0%	142,055	3.0%	146,316	690,188
	1,031,550		1,062,497		1,094,371		1,127,203		1,161,019	5,476,639
HB Income - Assumed 70% collection rate	- 112,039		- 112,039		- 112,039		- 112,039		- 112,039	- 560,196
										-
Cost to FCC	919,511		950,457		982,332		1,015,163		1,048,979	4,916,443
erage B and B cost (assumed single rate of £90 pa)	1,248,300	5.0%	1,310,715	5.0%	1,376,251	5.0%	1,445,063	5.0%	1,517,316	6,897,645
tential Saving to Council	- 328,789		- 360,258		- 393,919		- 429,900		- 468,337	- 1,981,202

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# Appendix 6: TACP Homeless Provision

Transitional Accommodation Capital Programme (TACP) funding must deliver housing for those households who are homeless or threatened with homelessness. Priority is given to households in temporary accommodation or those who will need temporary accommodation shortly.

In the financial year 2023/24 £1.966 million was used to bring back into use 104 homes (includes 5 Registered Social Landlord- RSL). They were all allocated to homeless households mostly as permanent accommodation and a few for temporary accommodation.

6 new homes (4x 3bed houses and 2x 4 bed houses) were acquired by RSL's "off the shelf" and were let to homeless households in March 2024 using Social Housing Grant of £1.055 million as an alternative to TACP.

A further 6 new homes (4x 3 bed houses and 2x 1 bed flats were or will be created by conversion/acquisition) with  $\pounds$ 0.89 million.

10 homes were acquired (9x council and 1x RSL) utilising £1.209 million to provide 1x 3bed house, 3x 2 bed houses, 2x 2bed flats and 4x 1bed flats. These will be used as temporary accommodation. Some of the 2 bed flats are ensuite, so can be utilised to accommodate 2x single households sharing. One has been completed and handed over to the homeless team, 9x more are pending for later this year subject to TACP construction bids to WG.

In addition, FCC has used its own resources to acquire an ex-shared ownership house which will be converted to allow 2x single households sharing as temporary housing.

For 2024/2025 we were notionally allocated £2.943 million for TACP. A bid was submitted as follows:

- £0.950 million for 26 voids brought back into use (20x FCC and 6x RSL)
- £0.467 million to refurbish the 10 acquired homes referred to above
- £0.752 million to acquire and refurbish a further 7 homes (a mix of modern flats and older ex-right to buy houses
- £0.808 million to enable an RSL to acquire 3x3bed houses and 1x 4bed house "off the shelf".

All of the above should be delivered by 31<sup>st</sup> March 2025.

A further pipeline of reserve schemes has been prepared should more resources become available as follows.

Additional 33 voids costing £1.036 million.

Additional acquisitions 19 costing £1.892 million

# Agenda Item 6



# Communities and Housing Overview and Scrutiny Committee Voids Management Update Reporting period: Sep 2024

Key figures		ceporting per	Α	м	J	J	Α	S
Number of new	void properties in re	porting period	38	39	37	39	36	33
	erties identified as c capital investment	lifficult to let or	25	25	26	21	19	20
Number of properties completed ready for allocation			44	48	46	44	43	41
Number of allocation offers accepted		39	41	46	41	40	38	
Number of lettings		31	28	40	37	42	43	
		Major voids	125	138	140	150	138	124
	Housing Assets	Minor voids	49	48	35	26	17	30
Breakdown of total void		ТВС	41	20	22	16	33	26
figures		High Demand	180	191	174	171	169	160
	Housing Management	In Progress	9	1	1	0	0	0
		Low Demand	26	14	22	21	19	20
Droporty Type	General Needs		104	96	97	98	97	76
Property Type	Sheltered		111	110	100	94	91	104
	1 bed		82	80	63	61	55	50
	2 bed		67	65	68	69	75	72
Property Type	3 bed		62	57	60	57	57	54
	4 bed		3	2	4	4	4	3
	4 bed plus		1	2	2	1	1	1
	Buckley		22	21	17	18	19	18
	C'Quay & Shottor	ı	32	29	31	29	27	28
Capital District	Deeside & Saltne	ey -	32	30	27	25	23	23
Areas	Flint		59	59	54	55	54	51
	Holywell		44	43	40	36	37	38
	Mold		26	24	28	29	28	22
Total voids			215	206	197	192	188	180

	formation
Provision of o	ther information to Overview and Scrutiny Committee
Top reasons f	or terminations:
• Aug	
0	Deceased (14)
0	Residential Care (7)
0	Moved to alternative accommodation (4)
Work Allocat	ion
Total number	of voids being worked upon - 132
Low Demand	assets
Bolinc	<u>pbroke Heights 2-Bed</u>
	Heights 2-Bed
	rd Heights 2-Bed
	e to desirability concerns relating to the communal areas and open spaces, alo
	ng service offer. Also relating to the bedroom tax applied to those persons unde
the age of 66.	
	Aled
• <u>Liwy</u> n	
• <u>Llwyn</u> • <u>Llwyn</u>	Beuno
• <u>Llwyn</u>	
• <u>Llwyn</u> Reasons – Du	ie to access and egress issues. Existing tenants (contract holders) along with
Llwyn Reasons – Du any applicants	le to access and egress issues. Existing tenants (contract holders) along with s who have refused an allocation offer, have expressed difficulties and or
Llwyn Reasons – Du any applicants	ie to access and egress issues. Existing tenants (contract holders) along with
Llwyn Reasons – Du any applicants concerns with	le to access and egress issues. Existing tenants (contract holders) along with s who have refused an allocation offer, have expressed difficulties and or
Llwyn Reasons – Du any applicants concerns with <u>Knigh</u>	te to access and egress issues. Existing tenants (contract holders) along with s who have refused an allocation offer, have expressed difficulties and or regards to the number of steps/ internal staircases.
Llwyn Reasons – Du any applicants concerns with <u>Knighr</u> Reasons – Du	te to access and egress issues. Existing tenants (contract holders) along with s who have refused an allocation offer, have expressed difficulties and or regards to the number of steps/ internal staircases.