

CABINET

Date of Meeting	Tuesday, 15 th October 2024
Report Subject	Homelessness “Independent Review” Report – Neil Morland & Co Housing Consultants
Cabinet Member	Deputy Leader of the Council and Cabinet Member for Housing & Communities
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 Council's 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).

RECOMMENDATIONS

1	Informal Cabinet 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	Informal Cabinet note the additional cost benefit information developed since last Informal Cabinet Meeting that demonstrates the anticipated efficiencies that could potentially be achieved.
3	Informal Cabinet support 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.
4	Informal Cabinet note the need for Houses of Multiple Occupation (HMO's) within the homeless accommodation diversification plans, and offer advice and support to Officers for engagement with local Ward Members and committees such as Planning Committee and Scrutiny Committees to emphasise the importance of supporting well managed HMO's for use as homeless accommodation.

REPORT DETAILS

1.00	EXPLAINING THE INDEPENDENT HOMELESS SERVICE REVIEW REPORT
1.01	<p>Statutory Homeless Services 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).</p> <p>When considering the core team activities for the Statutory Homeless Team this includes the following:</p> <ul style="list-style-type: none"> • Homeless Case Management • Homeless Accommodation Management • Homeless Accommodation Costs

1.02	<p>Funding Homeless Services</p> <p>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:</p> <ul style="list-style-type: none"> • Homeless Officers and other staff dealing with Homeless Duties and Assessments • Homeless Accommodation costs through lease charges and hotel accommodation expenditure • Staff costs associated with the management of homeless accommodation • Other costs associated with duties around homelessness such as storage costs and removals when people become homeless <p>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.</p> <p>This is a considerable concern for the Council and as highlighted in the recent Audit Wales Review of Homelessness Services in Flintshire (released January 2024) is unsustainable given the current levels of funding and in the current financial landscape.</p> <p>As part of the Council's response to areas of concern and high levels of expenditure, the Chief Executive engaged independent consultants to review the homeless service.</p> <p>This review by Neil Morland & Co. considers performance, legislative compliance, effectiveness of service delivery and scope for service improvement and efficiency.</p>
1.03	<p>Consultancy Services – Neil Morland & Co Housing Consultants</p> <p>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.</p>
1.04	<p>Scope of the Independent Review</p> <p>Flintshire County Council has commissioned the review to understand the quality of the homelessness and housing advice services it provides and what potential there is for improvement.</p> <p>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:</p>

	<ul style="list-style-type: none"> • Housing advice, homelessness prevention and options services • Homelessness strategy, services, and applications • Temporary accommodation for statutory homeless households <p>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 has asked for the following questions to be considered:</p> <ul style="list-style-type: none"> • 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? <p>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.</p>
1.05	<p>National Policy - Homelessness</p> <p>In October 2023 Welsh Government published a White Paper on Ending Homelessness in Wales. Consultation for the White Paper closed on the 16th January 2024. Welsh Government have received over 160 formal responses and are now reviewing these responses.</p> <p>A wide range of changes to legislation relating to homelessness are outlined within the White Paper, with the most notable changes outlined below:</p> <ul style="list-style-type: none"> • S66. Statutory Prevention Duty to be triggered at six months risk of homelessness not current two months • Abolition of the priority need test – all eligible residents/households to be offered full duties • Merging of the s73 Relief Duty and s75 Full Duty • Changes to Local Connection Test – variation and additional protections for certain groups of people • Significant changes to the Intentionality Test principles • Firming up the Personal Housing Plan (PHP) process on a legal footing and creating statutory review points for PHP’s • Improved standards relating to homeless accommodation duties • Changes to the Allocations Code of Guidance for Social Housing to increase access for homeless households • Statutory Powers for Local Authorities to compel Housing Associations to take homeless nominations • Extending “partners duties” around homelessness to a wider group of public sector services • Introducing a “duty to identify and refer” homelessness on a range of public sector services

	<ul style="list-style-type: none"> • Introduction of a Housing Sustainment Duty to support risks of repeat homelessness <p>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.</p> <p>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 ending homelessness at the present time, and in light of additional statutory responsibilities suggested within the White Paper.</p>
1.06	<p><u>Key Conclusions of the Independent Review</u></p> <p>The key findings and conclusions of the review will be outlined by Neil Morland and Tim Grey from Neil Morland & Co. during the meeting but in summary the conclusions are as follows:</p> <ul style="list-style-type: none"> • 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

	<p>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.</p> <ul style="list-style-type: none"> 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.
1.07	<p>Independent Review Recommendations</p> <p>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.</p> <p>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.</p>
1.08	<p>Responding to the Independent Review</p> <p>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.</p> <p>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..</p> <p>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.</p>

2.00	RESOURCE IMPLICATIONS
2.01	Detailed below are the cost implications associated with the delivery of Homelessness Services in Flintshire:

Revenue: 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 £7.500m. The financial options are as follows:

1. Implementation of the staffing structure (Appendix 4) to improve homeless prevention outcomes and maximise housing costs recovery rates.
2. Increased number of alternative properties including utilising the D2 model

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 £3.500m - £5.500mm therefore reducing the pressure by a minimum of £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	<p>The following risks and mitigations have been identified by way of control measures:</p> <p>Risk: 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.</p>

Mitigations:

- Respond to the findings of the Independent Review and the associated Recommendations (11 in total).
- 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
- 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

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:

- Achieve efficiencies through cost avoidance on hotel accommodation through additional prevention work, and management of alternative forms of homeless accommodation by recruiting additional staff.
- Support the Housing & Prevention Service restructure on principle of invest to save (£396,333 in staff to realise in excess of £1million efficiencies).
- Recruit and retain a sufficient scale of workforce, whom are appropriately skilled and trained are available to deliver homelessness and temporary accommodation services.
- 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 through 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 those additional properties taken on to 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).

	<p>Mitigations:</p> <ul style="list-style-type: none"> • Adopt 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 HMO's with the homeless accommodation portfolio. <p>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).</p> <p>Mitigations:</p> <ul style="list-style-type: none"> • 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. • Support the planned restructure to ensure capacity within the workforce to meet the needs of vulnerable people experiencing homelessness. 										
3.02	<p>Ways of Working (Sustainable Development) Principles Impact</p> <table border="1" data-bbox="320 1059 1385 1787"> <tr> <td data-bbox="320 1059 743 1205">Long-term</td> <td data-bbox="743 1059 1385 1205">Positive – Increase in targeted support and alternative delivery methods to ensure services are inclusive for all.</td> </tr> <tr> <td data-bbox="320 1205 743 1391">Prevention</td> <td data-bbox="743 1205 1385 1391">Prevention - Preventing homelessness through ensuring there is adequate support and accommodation to cater for a range of peoples needs.</td> </tr> <tr> <td data-bbox="320 1391 743 1503">Integration</td> <td data-bbox="743 1391 1385 1503">Positive – Increased integration between services and partner organisations.</td> </tr> <tr> <td data-bbox="320 1503 743 1644">Collaboration</td> <td data-bbox="743 1503 1385 1644">Positive – Increased collaboration between services, partner organisations and service users.</td> </tr> <tr> <td data-bbox="320 1644 743 1787">Involvement</td> <td data-bbox="743 1644 1385 1787">Positive – Service user involvement to help shape effective services so that support is timely and person centred.</td> </tr> </table>	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.
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		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
	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.

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

	Appendix 5: Homeless Accommodation Transformation Activities Appendix 6: TACP Progress and Pipeline Summary
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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	<p>Rough Sleeper: 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 8.03).</p> <p>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.</p> <p>Priority Need: 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.</p> <p>Transitional Accommodation Capital Programme: 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).</p> <p>Rapid Rehousing: 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.</p> <p>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.</p>

	Typically, each resident has their own rental contract for the period of occupation.
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