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.

Contents

Executive Summary 4
Introduction 7
Scope and methodology 8
Findings 10
Flintshire in context 10
Financial situation 13
Audit Wales report 14
The operation of the service 15
Staffing structure 16
Access to the service 21
Policies/procedures 22
Data and IT 23
Temporary Accommodation 24
Settled accommodation supply 25
Existing social housing 25
Voids 27
New social housing development 27
Private rented accommodation 28
Work with other agencies/ departments 30
The Council's plans 31
Homelessness Budget Pressure – Options Paper 32
Rapid Rehousing Transition Plan 34
Ending Homelessness Board 35
Conclusions 36
Recommendations 39

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 in-house 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 1-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

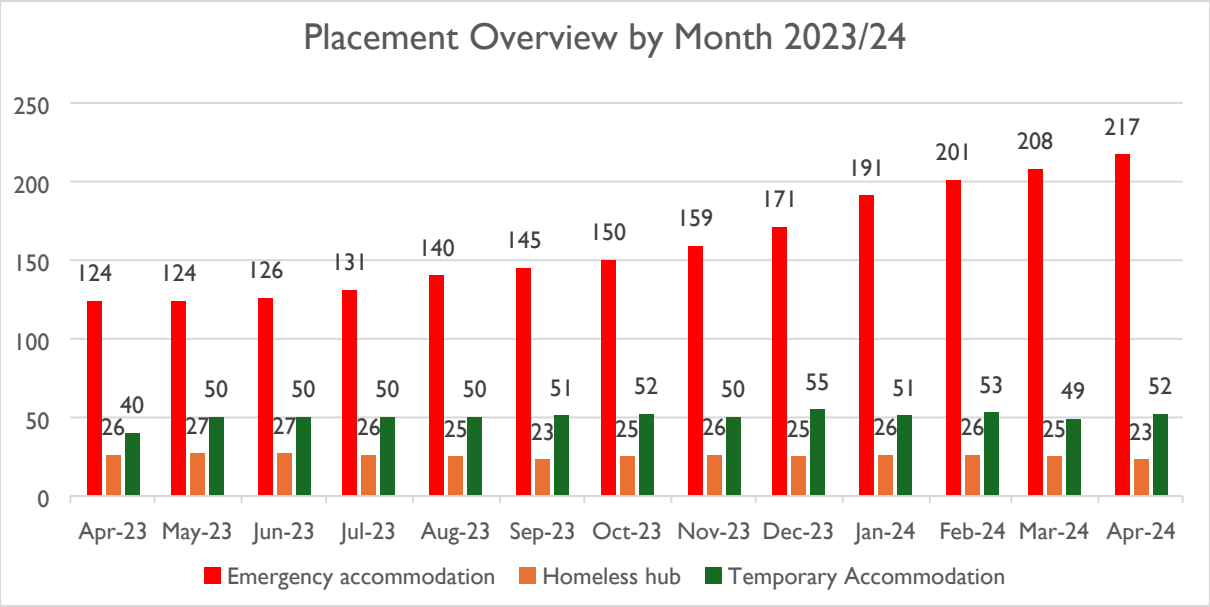
Flintshire in context

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-19th 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.

[1] 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.

Figure 2.

Period	Measure	Flintshire	Wales	Flintshire rank in Wales (out of 22 LAs)
2022/23	Households threatened with Homelessness within in 56 days -Rate per 10,000 households (Section 66)	48	67	12th highest
2022/23	Households successfully prevented from Homelessness – Percentage (%) (section 66)	59%	59%	8th highest
2022/23	Households assessed as homeless and owed duty to secure – Rate per 10,000 households (Section 73)	49	91	22nd highest (i.e. lowest)
2022/23	Households successfully relieved from Homelessness – Percentage (%) (Section 73)	41%	30%	6th highest
Feb-24	Individuals in TA per 10,000 households	55	85	14th highest
Feb-24	Dependent children in TA per thousand households	8	23	18th highest
Feb-24	Individuals in B&B and hotels per 10,000 households	32	28	8th highest
Feb-24	Dependent children in B&B and hotels per 10,000 households	4.3	5.5	10th highest
Feb-24	Percentage of individuals in TA who are in B&B	58%	33%	8th highest

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 six-month 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.

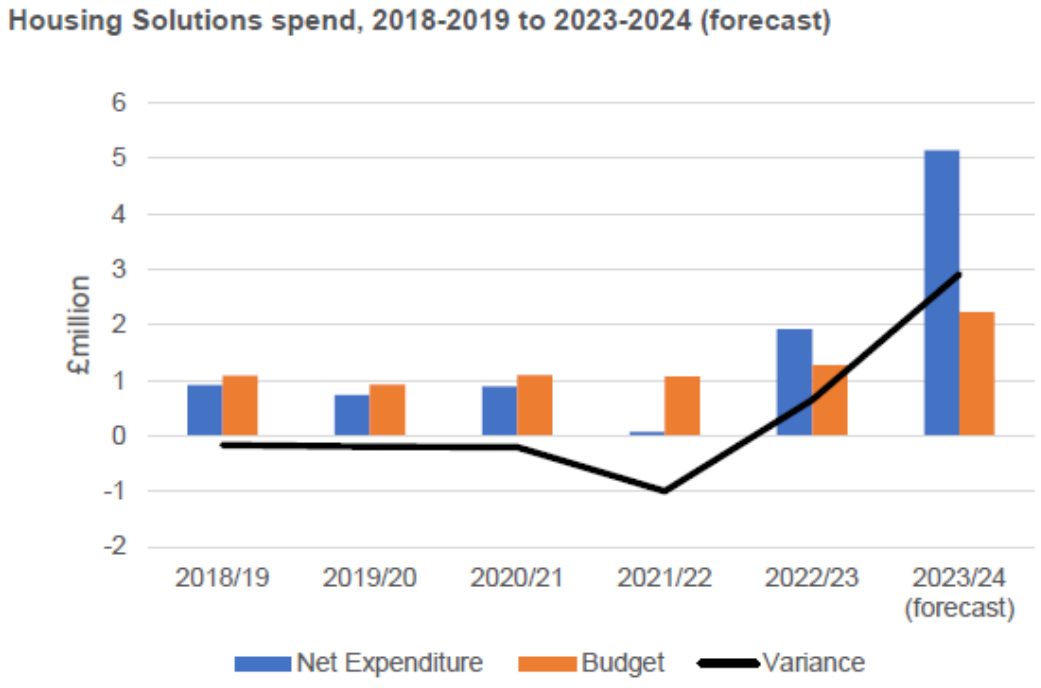
- However, the percentage of both adults and especially children in TA who are in B&B or hotel accommodation are well above average, with the percentage of children in TA who are in B&B or hotel accommodation, the 4th highest in Wales.

- 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.



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.

[2] 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 £9.40 per night is eligible for Housing Benefit subsidy for hotels, meaning a net cost to the council of approximately £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 £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 £14.7m which would include a budget pressure of around £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:

- 1x Head of Service
- 5x team leaders

- 24x homelessness caseworkers
- 6x specialist officers
- 1x rough sleeper officer
- 1x 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[3] 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 ex-offenders 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.

[3] 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 homelessness[4]'.

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:

[4] 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 here.

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[5], 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

[5] 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 13th 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[6] 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[7] 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 1-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.

[6] Based on information from the Flintshire Rapid Rehousing Transition Plan
[7] Including 23 studios
[8] 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[9].

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[10] 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 30th percentile rents. The changes to LHA rates from April 2024[11] are shown in Figure 4.

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%**
1 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%**

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 £185 pw across all property sizes between January and June 2023 and the cost of hotel accommodation at around £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.

[9] https://rentsmart.gov.wales/en/home/
[10] 329 total listings in 2022 x 15% 1-beds x 6.75% at LHA = 33.1
[11] 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:

1. 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:

Option 1a 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

Option 1b - 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

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

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

Option 3a - 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.

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

Option 3c - 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.

Option 4a - 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

Option 5c - 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:

P1: 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.

11. 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 1-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.

NEIL MORLAND CO

HOUSING CONSULTANTS

Message I Call I FaceTime I Mail

07816935620 neil@neilmorland.co.uk

website LinkedIn YouTube

Registered office: 78 Borough Road, Altrincham, Greater Manchester, WA15 9EJ

Company number: 7776084 VAT number: 135466214