



Department for Levelling Up,  
Housing & Communities

# Evaluation of the Supported Housing Oversight Pilots



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April 2022

## Foreword

This report provides evidence from an evaluation of a pilot initiative to test the effectiveness of measures to improve enforcement as a means of improving the quality and value for money of supported housing.

The report sets out key findings and recommendations centred on the impact of : improved property inspections and enforcement of standards, reviews of support to residents, scrutiny of new and existing Housing Benefits claims and improved strategic planning to understand local markets.

Kantar Public and Imogen Blood & Associates conducted fieldwork in five pilot areas (Birmingham, Blackburn with Darwen, Blackpool, Bristol, and Hull) to inform the evaluation. This fieldwork comprised Theory of Change workshops, in-depth interviews and focus groups with stakeholders, partners and providers, and case studies of some pilot initiatives. Alongside this, Kantar Public collected monitoring data from local authorities to track implementation of the measures tested and to indicate pilot progress and emerging outcomes.

The findings show improvements to the quality of residential support and standards, reductions in the number of illegitimate or unreasonable Housing Benefit claims and improved an understanding of demand for and supply of supported housing. Despite initial evidence of these positive impacts, local authorities' efforts were constrained by the regulatory framework and longer-term impacts may be limited without further funding to embed and expand enforcement activities.

It should be noted that there are methodological limitations to this work, including the design being limited to a before and after study and challenges with acquiring robust baseline and monitoring data. These methodological limitations mean that although there is some evidence of impacts, more robust evaluation is needed to determine to what extent supported housing provision can be improved through better enforcement of existing standards alone without any changes in regulation or legislation.

Nonetheless, this initial evidence demonstrates the potential to improve national standards in the supported housing sector. It should also be seen within the context of a wider programme of evidence and research on vulnerable people, for example [our Homelessness and Rough Sleeping Research Programme](#) and the departmental commitment to understanding how our investments impact on the most vulnerable in our society as set out in our [Housing Monitoring and Evaluation Strategy](#).

Over the coming years, we plan to continue to evaluate investments in supported housing, working with local authorities to collect the data that is needed to inform robust assessments of impact.

I would like to thank Kantar Public and Imogen Blood & Associates for their hard work gathering information from the pilot areas, the Supported Housing Programme team whose support was critical to the research and the pilot staff and other stakeholders who participated in the research.

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# 1. Executive Summary

## 1.1 Background

In recent years, the Department for Levelling Up, Housing and Communities (DLUHC) has become aware of issues with quality and value for money in a small part of the supported housing sector, primarily in short-term (or ‘transitional’) accommodation. DLUHC and DWP worked closely with local government, providers and the third sector to understand these concerns, particularly in response to early evidence such as Commonweal Housing's report on exempt accommodation.

To begin to address these issues, between September 2020 and October 2021, DLUHC funded Birmingham, Blackburn with Darwen, Blackpool, Bristol, and Hull Councils £5.4m to test enforcement measures to improve quality and value for money in supported housing. The pilots were intended to be targeted and proportionate, and to avoid unintended consequences for the much-needed supply of supported housing.

The aims of the pilots were to:

- Improve the standard of support and accommodation;
- Improve the value for money of supported housing;
- Improve oversight of supported housing;
- Identify best practice that could be applied across the country; and
- Explore to what extent supported housing provision can be improved without any changes in regulation or legislation.

## 1.2 Context

Because of the severity of the issues in pilot local authorities, funding and resource was a significant barrier to improving quality and value for money, which the pilots sought to address. The pilots addressed a complex policy area, and activities were delivered within the constraints of the existing regulatory framework.

Local authorities worked in the relatively short timeframe of a year, part of which was affected by local and national restrictions due to the COVID-19 pandemic. Findings around outcomes and expectations for longer-term impact should be interpreted in this context.

## 1.3 Methodology

The pilot design and length did not allow for the formation of comparison groups, which would allow the calculation of robust impact assessments. Instead, the evaluation used before and after comparisons, using monitoring data and qualitative accounts of change to indicate progress and impact. The evaluation approach included developing an agreed Theory of Change, in-depth interviews and focus groups with stakeholders, partners and providers, and case studies of particular pilot initiatives. Alongside this, Kantar Public collected monitoring data from local authorities to track implementation of activities and to indicate pilot progress and emerging outcomes. Due to the variable data that local authorities collected on supported housing before the pilots, there was not a complete, usable baseline for the monitoring data.

Although Kantar Public have taken steps to compensate for this, it should be considered when interpreting and using quantitative findings from this evaluation (see Section 4.8). These

methodological limitations mean that although there is some evidence of impacts, more robust evaluation is needed to determine to what extent supported housing provision can be improved without any changes in regulation or legislation.

## 1.4 Overview of pilot activities

### All local authorities conducted core activities:

- Property inspections and enforcement of property standards;
- Reviews of support provided to residents;
- Enhanced scrutiny of new and existing Housing Benefit claims;
- Strategic planning to better understand the local market.

Pilot areas then supplemented these with other activities appropriate to their local context, such as developing and launching local quality standards for supported housing; working with specific cohorts such as young people and victims of domestic abuse, addressing anti-social behaviour and trialling ways of managing new provision.

## 1.5 Key findings

### 1. Local authorities reported that the pilots improved the quality of resident support and helped make it more tailored and sufficient for residents. This was made possible by:

- more frequent and in-depth support reviews (8,723 across the pilots) which led to 452 actions taken with providers to improve the support (e.g., revisits to assess improvements, engagement with providers, and organisational reviews);
- improving support reviews and processes to monitor the quality of support;
- work with voluntary sector partners to improve routes through which residents are referred into supported housing; and
- close, multi-disciplinary working on individual cases within the councils.

Through the pilot, Birmingham launched its Charter of Rights for supported housing residents. The Council believe this has empowered its citizens, who now better understand the support and quality of housing they should be receiving. The Charter has also encouraged changes in provider practices: providers are now more willing to work alongside Birmingham's Adult Social Care team to improve the quality of their service delivery and achieve the standards laid out in the Charter.

Local authorities agreed that the pilots are also likely to have a positive impact on improving resident outcomes in the long term, but it will take time to see the full extent of this.

### 2. Over the course of the pilots, local authorities have reduced the number of illegitimate or unreasonable Housing Benefit claims paid out, by improving the process of Housing Benefit scrutiny and increasing the number of reviews carried out. Local authorities have seen a reduction in the amount of Housing Benefit being paid out in error in relation to 1,534 claims, and decisions made on 1,285 claims that the definition of specified accommodation was not being met. The pilot funding has given local authorities the extra resources to achieve this through activities such as carrying out support reviews, scrutinising costs data, challenging unreasonable service charges and investigating providers' structure.

Hull's Supported Accommodation Review team has used information from support reviews to feed into reviews of Housing Benefit claims. As a result, they have overturned a number of individual claims for specified accommodation because providers have not been able to prove that they are providing sufficient support.

3. **At the end of the pilots, local authorities estimated that they had prevented £6.2 million being paid in error**, based on economies from preventing new claims and reviewing claims currently in payment. Blackpool, for example, deterred 25 providers from setting up new schemes in the area that did not meet local need, and Birmingham reported recovering £2.5m in overpayments on Housing Benefit.

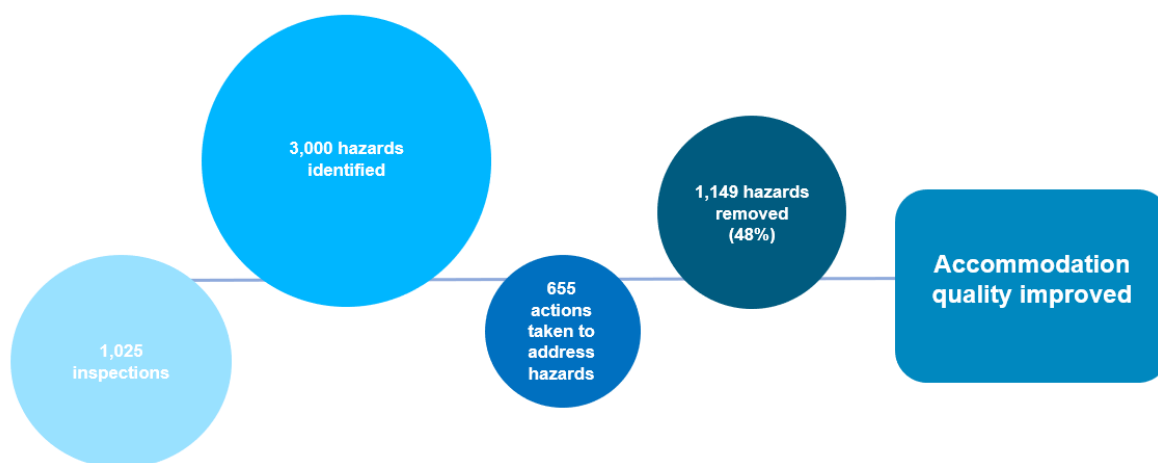
This figure is based on local authorities' own reporting rather than a consistent economic analysis of value for money across all areas. Further analysis could look to quantify the value arising from preventing abuse of the system by a minority of providers, as well as the value of improving quality of accommodation and support, whilst taking account of off-setting costs for housing support in alternative housing for the individual residents/claimants.

4. **Local authorities agreed that the pilots led to improved quality and standards of accommodation through investment in property inspections and enforcement activities to identify and resolve property hazards.** They identified 3,000 hazards through proactive and reactive inspection programmes, which would otherwise not have been identified. Of these, 1,449 were resolved by the end of the pilots (48%). In most cases local authorities used letters –both formal legal powers and informal communications – to address hazards. Most hazards identified did not require formal legal action to resolve, although local authorities have continued to pursue resolution of some at the end of the pilots. Therefore, they preferred to bypass the weakness of existing legislation, time and specialist skills required for a successful legal outcome.

This funding was vital for authorities to carry out inspections: Blackburn estimated that without it, they would have conducted few or none of the 24 inspections of the large, multi-occupancy accommodation units.

Building on the cross-Council multi-disciplinary team, Blackpool partnered with Lancashire Fire and Rescue Service to conduct multi-agency property inspections. These enabled them to identify a wider range of hazards efficiently and quickly and ensure resident safety.

Figure 1: Graphic showing pilot activities that led to the improvement of accommodation quality



5. **Local authorities found that conducting an assessment of demand for and supply of supported housing helped to improve their understanding of the local market. Local authorities that have conducted a strategic planning exercise experienced further benefits.** For example, some areas found it aided them to estimate future demand in their area and map out existing referral pathways to providers. Local authorities also developed strategic planning methods to apply and refine in future such as creating provider surveys, using existing datasets and interviewing residents.



Building on previous strategic planning, Bristol has undertaken work to understand why some residents do not successfully progress through supported housing to independent living. The Council is now working with providers to explore alternative housing models and other approaches to make sure that placements suit individuals.

At the close of the pilots, local authorities have incorporated their learnings into policies or strategies and planned to implement those in the post-pilot period for greater, longer-term impact.

6. **The pilots improved local authorities' ability to intervene in new provision and prevent providers from establishing new and unnecessary schemes.** The pilot funding allowed teams to implement new gateway approaches including property visits, paperwork scrutiny and conversations with providers, preventing unreasonable accommodation costs in some areas in the pilot period.
7. **Partnerships and multi-disciplinary ways of working were vital contributors activity success.** The development of multi-disciplinary teams working together within the council and with external partners proved to be an effective intervention. Bringing together expertise from housing, revenue and benefits, environmental health, social care, planning and other services greatly enhanced the authority's capacity and capability to tackle the complex and interconnected issues. It enabled better dialogue and collective decision making, which in turn had a positive impact on quality and value for money. It also facilitated better and more joined up conversations with external partners and helped to amplify resident voice. Where they can continue post-pilot, they are likely to change the culture of local authorities' working practices as well as improve the quality of accommodation and support, resident outcomes, and value for money in the long term. However, there is a risk that partnership and multi-disciplinary working will become less targeted or more sporadic without specific funding.

Despite these positive impacts, local authorities reported their efforts were constrained, and even hindered, by the regulatory framework within which they worked – including Housing Benefit regulations and a lack of standards for support. Local authorities have also expressed concerned that, once the pilots funding was spent, they did not expect to be able to continue activities at the same level, limiting the longer-term impact of their work.

## 1.6 Additional outcomes of the pilots

- **Local authorities have been able to understand the need for supported accommodation in their area and plan to meet it.** This has been achieved by carrying out an increased number of more in-depth care and support needs assessments of supported housing residents, mapping supply and developing strategic plans for supported housing going forward. Supported housing has been scrutinised more than ever before due to improving joined up working practices through multi-disciplinary teams and conducting support reviews.
- **Residents have provided more feedback on their accommodation and support** through increased engagement, and this has also improved their awareness of standards and processes. This has started to lead to an improvement in the quality of accommodation and support.
- **Local authorities and providers have developed stronger relationships and a better mutual understanding** through liaison around pilot activities such as organising inspections or requesting further information about properties and quality issues.
- **Local authorities have improved their processes for responding to safeguarding concerns** and complaints. Meanwhile, local authorities have reported new safeguarding

concerns that individual claimants may suffer an emotional impact from scrutiny of their claims or being called upon to provide testimony at trial.

## 1.7 Key recommendations

- **Make short-medium term funding available to local authorities to oversee supported housing in their area**, to embed and potentially expand the pilots' work while longer term reforms (e.g., regulatory and legislative measures) are agreed and implemented. The benefits gained through the pilots may be otherwise time limited. As local authorities reported it was challenging to complete their activities in a year, this funding should be over a longer period.
- **Aim to define “care, support and supervision”, and review regulations around rent levels and subsidy, to increase the impact of Housing Benefit scrutiny activities.** Despite the positive progress observed as a result of enhanced scrutiny of claims, local authorities have been limited by what they saw as a lack of detail in Housing Benefit regulations or regulations not functioning as intended. This limited their ability to challenge claims during Housing Benefit scrutiny.
- **Strengthen local authorities' powers to support them to intervene in new supply where it is unnecessary or poor-quality.** Gateway approaches emerged as an important activity during the pilots for gaining control of supported housing supply. Options could include requiring a provider to seek the approval of the local authorities before establishing a new scheme.
- **Review funding and regulation for the support element of supported housing to improve quality and support.** Reviews of the care, support and supervision provided to residents were valuable during the pilots, but local authorities' oversight of support is currently limited by existing regulation and funding to commission support services, which is provided to local authorities through the Local Government Finance Settlement.

## 1.8 Limitations to the impact of the pilots

The impact of the pilots has been somewhat limited by the following factors, **particularly in relation to non-commissioned supported housing**:

- **Care, support or supervision (CSS) are not defined in Housing Benefit regulations** and the stipulation used in case law has a low threshold of 'more than minimal'.
- Local authorities' Housing Benefit teams must assess whether more than minimal care, support or supervision is being provided and whether the individual has a need for that CSS. However, where the CSS is not commissioned by local authorities, it is more challenging for them to assess the quality of CSS being provided.
- **Housing Benefit decisions made by local authorities may be appealed.** This appeal process takes a long time and substantial resource, with feedback suggesting that appeals relating to supported housing have a relatively low chance of the decision being upheld.
- **Housing Benefit teams cannot make blanket decisions** on whether a scheme meets the specified supported housing requirements in Housing Benefit regulations. This is because Housing Benefit belongs to the individual and claims must be decided on a case-by-case basis – depending on their own merits and the facts in each individual case.
- **There is no requirement for providers to liaise with local authorities before setting up** and local authorities have no levers or powers to prevent them from opening new schemes, regardless of whether they meet local need or the local authorities' expectations on quality.

## 2. Glossary

<b>Commissioned/ non-commissioned supported housing</b>	Where supported housing is described as ‘commissioned’, the local authority (or in some cases the NHS or another statutory body) is purchasing the support provision either from the landlord or from a separate provider. In non-commissioned supported housing, the support element is funded outside of any commissioned framework, for example, through contributions from residents, or from charitable sources.
<b>Eligible housing costs</b>	Housing costs which can legitimately be covered by Housing Benefit (includes supported housing; note that housing costs for working age people living in general needs housing are paid through Universal Credit)
<b>Exempt accommodation</b>	<p>A definition introduced into Housing Benefit regulations in 1996 to protect/or exempt those individuals in supported accommodation/specialist housing provided by not-for-profit landlords from the rent restrictions being introduced to Housing Benefit based on average rents in a particular locality.</p> <p>In the Housing Benefit and Universal Credit (Supported Housing) (Amendment) Regulations 2014, this category (along with other forms of what was newly termed ‘specified accommodation’) was also exempted from the Benefit Cap and Universal Credit housing cost arrangements.</p>
<b>Housing Benefit (HB)</b>	Housing Benefit is an income-related benefit, administered by local authorities, which is intended to assist people who need help to pay their rent. Entitlement is assessed by comparing a person's net income with an amount, known as an applicable amount, which is intended to cover day-to-day living expenses, taking account of the size and make-up of the household.
<b>HMOs</b>	House in Multiple Occupation: The standard test for a HMO is whether two or more households share a basic amenity, such as a bathroom.
<b>Managed properties</b>	A category of ‘specified accommodation’ (referred to in the DWP Housing Benefit Circular A8/ 2014 as ‘managed properties’) to cover those cases which fall out of the current ‘exempt accommodation’ definition solely because the care, support or supervision is not provided by the landlord or on their behalf. This is often due to the nature of funding structures, e.g. where a separate support provider is commissioned by a public body. The claimant must have been ‘admitted’ to the accommodation ‘in order to meet a need for care, support or supervision.
<b>Registered Provider (RP)</b>	An organisation registered with the Regulator of Social Housing. Registered providers of social (including supported) housing includes local authority landlords and private registered providers (such as not-for-profit housing associations and for-profit organisations).
<b>Service charge</b>	Service charges are levied by residents to meet the cost of any services connected with the provision of adequate accommodation provided by their landlord that are not included within the rent.

<b>Specified Accommodation (SA)</b>	A definition introduced by the Housing Benefit and Universal Credit (Supported Housing) (Amendment) Regulations 2014 which extended protections for those in some other types of supported housing (who were not already covered by the definition of 'exempt accommodation') from the benefit cap and Universal Credit. Four sub-categories are included in 'specified' accommodation: exempt accommodation, managed properties (see separate definitions for both of these), domestic abuse refuges, and local authority-owned hostels (i.e. non-self-contained supported housing).
<b>Supported Housing</b>	Any housing scheme where housing, support and sometimes care services are provided to help people to live as independently as possible in the community. Supported housing residents include those who need support and would otherwise be homeless (including those at risk of domestic abuse) and older and/or people with long-term physical or mental health needs (who might otherwise be living in long-term care or hospital settings).
<b>Universal Credit (UC)</b>	Universal Credit is a means-tested benefit for people of working-age who are on a low income. It replaces six existing means-tested benefits, including Housing Benefit. Those over pensionable age and/or those living in Specified Accommodation or Temporary Accommodation continue to receive Housing Benefit.
<b>Housing Health and Safety Rating System (HHSRS)</b>  <b>Category 1 hazards</b>  <b>Category 2 hazards</b>	<p>There are 29 potential hazards identified by the Housing Health and Safety Rating System (HHSRS). Hazards are rated from A to J, with A being the most serious hazard (e.g. structural collapse and falling elements), and J being the least serious hazard (e.g. damp and mould growth).</p> <p>If a hazard is a serious and immediate risk to a person's health and safety it is rated A to C. These are deemed Category One Hazards and Councils have a legal duty to take action where HHSRS Category One hazards are present to reduce the Hazards to a reasonable level. Options include the service of Improvement Notices, Prohibition Orders, or taking Emergency Remedial Action.</p> <p>Less serious/urgent hazards rated D to J within HHSRS are classed as Category Two Hazards and Councils have a discretion to take action to reduce significant Category 2 Hazards to a reasonable level. Options include the service of an Improvement Notice, Prohibition Order, or Hazard Awareness Notice which identifies the Hazard and tells the landlord how to reduce the Hazard but does not provide a mandatory timeline. Further information is available at:  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7853/safetyratingsystem.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7853/safetyratingsystem.pdf</a></p>
<b>Care, support and supervision (CSS)</b>	Though CSS are not defined in Housing Benefit legislation, in practice, to qualify for specified accommodation (e.g. exempt, 'managed properties' and local authority hostels), the benefit claimant must have an established need for and be provided with CSS. Case law requires 'more than minimal' provision of CSS, which may include traditional face-to-face support or the presence of staff on site, and may also include repairs and maintenance.

## 3. Background and aims of the pilots

### 3.1 Background

Supported housing is housing that is provided to people with care and support needs (including those at risk of homelessness or rough sleeping, prison and care leavers, and individuals with poor mental health). Supported housing is intended to help them to live independently within the wider community, with personalised care and support services provided as part of the housing offer. Supported housing provides a valued service to many individuals, and previous studies have suggested cost benefits for local authorities and the wider public sector<sup>1</sup>. However, there has been increasing concern that some supported housing (particularly in the short-term transitional market<sup>2</sup>) is of a poor quality and of low value for money, both in terms of accommodation standards and the level of support provided to residents.<sup>3</sup>

In light of this, in September 2020 DLUHC invited five local authorities (Birmingham, Blackburn with Darwen, Blackpool, Bristol and Hull) to participate in the Supported Housing Oversight Pilots (SHOP), with the aim of testing interventions to address issues of quality and value for money within the sector. Each local authority submitted a proposal to DLUHC outlining the activities to be undertaken in their area, with funding granted by DLUHC based on the nature and scale of pilot work and challenges in the local market.

Pilots were initially scheduled to run for six months until March 2021, but this was extended to September 2021 in order to refine and target activities, continue to build the evidence base on their effectiveness, and conclude activities delayed due to COVID-19 restrictions. Funding was increased to cover these activities, although Bristol opted not to apply for this.

### 3.2 Aims of the evaluation

The evaluation of the Supported Housing Oversight Pilots, conducted by Kantar Public, seeks to understand how these pilots have been implemented, and what early impacts can be measured. Its core objectives are to:

- Understand the outcomes of interventions tested in the five local authorities and determine which has had the greatest impact;
- Determine whether existing powers are sufficient to address poor quality or whether more stringent enforcement powers are needed;
- Reveal the effectiveness of different methods of data collection used by local authorities for their strategic planning, and determine which was the most successful;
- Gather lessons learned from each local authority's activities and set out recommendations for best practice that could be shared more widely.

### 3.3 Local authority context

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<sup>1</sup> See for example: DCLG/ Cap Gemini (2009) [Research into the financial benefits of the Supporting People programme](#)

<sup>2</sup> See for example: IPPR North (2020) [At a crossroads: the future of transitional supported housing](#)

<sup>3</sup> See for example: Blood, I., Copeman, I. & Finlay, S. (2016) [Supported Accommodation Review](#), DWP/ DCLG

The five local authorities invited to apply for pilot funding have diverse supported housing markets, structures and local contexts. Prior to the pilots, all had begun work to address challenges with quality and value for money in their areas.

**Birmingham**'s primary concern at the outset of the pilot was the oversupply of supported housing in the city (a total of 18,000 units of non-commissioned supported housing), concentration of poor-quality accommodation in particular areas, and poor-quality support and accommodation. The resultant issues with anti-social behaviour and supported housing resident wellbeing had drawn media attention, research from Spring Housing and others, and prompted a Council scrutiny inquiry of supported housing. The pilot introduced closer working between the Housing Benefit team and other disciplines within and beyond the Council, and included a secondment from the police. It also had a strong focus on resident experience and wellbeing, through the roll-out of a Charter of Rights (developed pre-pilot) alongside a related Quality Standards accreditation scheme for providers. The size of Birmingham City Council's governed area and supported housing supply meant their pilot could not aim to inspect all properties or engage with all providers, but to focus on ones where they could make the most impact.

In **Blackburn with Darwen** the local non-commissioned supported housing sector is relatively small, with just 682 non-commissioned supported housing units, and tends to be dominated by charities (rather than Registered Providers). The pilot was overseen and led by the in-house Housing Benefit team. Its focus has been on formalising processes, undertaking extensive data analysis to understand demographics and routes into and out of supported housing, and engaging expert resource from other departments to review Supported Exempt Accommodation (SEA) properties.

**Blackpool** has some well-established local providers and some newer Registered Provider or Community Interest Company (CIC) entrants to the market, in an area where quality concerns are also prevalent in the private renter sector. It has 550 non-commissioned accommodation units, with a high proportion of HMOs in the town's private rented sector housing market, some of which have now become SEA. The pilot was led by a long-standing Commissioner from an Adult Social Care/Children's background, bringing insights from when some of the current supported housing was commissioned by the council, and how this provision fits into local housing, care, support and homelessness systems. The focus of Blackpool's pilot has been on bolstering Housing Benefit capacity and growing a multi-disciplinary inspection team.

**Bristol** have already undertaken substantial work to improve supported housing in the city in the years before the pilot, mainly to tackle major issues with charity-led, poor quality non-commissioned provision. At the start of the pilot, it had just 211 units of non-commissioned supported housing (representing around 5% of all supported housing in the city) and had well-established referral routes within local systems. Therefore, Bristol have had a much smaller pilot than other local authorities, and this aimed to further refine and share best practice and processes. The Bristol pilot team was led by one officer from a Housing Benefit background, supported by a small team to conduct housing inspections and support/safeguarding reviews. For this reason, quantitative measures provided by Bristol throughout reflect pre-pilot efforts and standards in their supported housing market.

**Hull** have come into their pilot with an existing multi-disciplinary Supported Accommodation Review Team (SART), which had been operational for 18 months before the pilot started, encompassing 1,076 units of non-commissioned supported housing.<sup>4</sup> The pilot allowed for the expansion of this team and the further development of their work (e.g. increasing numbers of inspections and resident support reviews). Housing Benefit scrutiny is undertaken by Civica, which has dealt with all of Hull City Council's Housing Benefit claims since 2016. The pilot team also commissioned external independent needs assessment work from Homeless Link to feed into their

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<sup>4</sup> Hull has 2,800 units of supported accommodation, of which 1,526 are short-term. ~450 of the short-term claims receive HRS funding and are not dealt with by the SART team.

strategic planning. As well as general activities such as housing inspections and Housing Benefit scrutiny, Hull have a strong focus on street-based regeneration, and environmental and community safety work.

All local authorities have undertaken activities relating to:

- Enforcement of housing standards, with the aim of improving housing quality;
- Housing Benefit scrutiny and inspections, with the aim of ensuring value for money;
- Care and support reviews, to ensure that residents are receiving sufficient and appropriate support within accommodation;
- Strategic planning, based on local need and supply assessments, to understand how and why supported housing is used in the local area, and by whom, and to plan to meet local need in a sustainable way, with good quality supply.

However, each local authority has also conducted additional unique activities according to local need, which are summarised below in Figure 2.

Figure 2: Summary of unique activities undertaken by local authorities

Local Authority	LA Specific Activities
Birmingham	<p><i>Investigations into links between serious organised crime and Supported Exempt Accommodation (SEA), in partnership with West Midlands Police</i></p> <p><i>Launch of Birmingham Charter of Rights</i></p> <p><i>Roll out of Quality Standards accreditation scheme</i></p> <p><i>Dashboard development to capture Key Performance Indicators</i></p> <p><i>Toolkit for managing the process of large providers exiting the sector</i></p> <p><i>Training for providers</i></p> <p><i>Anti-social behaviour policy development</i></p> <p><i>2-month reviews of every new Housing Benefit claim</i></p>
Blackburn	<p><i>Close working groups for benchmarking rents and service charges</i></p> <p><i>Full review of core rent costs and service charges to produce comparison matrix</i></p> <p><i>Full data analysis of current and previous claimants including demographics and routes into and out of supported housing</i></p> <p><i>Enhanced partnership with Shelter Lancashire</i></p>

	<p><i>Defining short- and long-term accommodation within the borough</i></p> <p><i>Feedback meetings with local authority departments / partner agencies</i></p> <p><i>Discussions with landlords to discuss issues and expected standards</i></p> <p><i>Data collection and analysis on residents in supported housing</i></p>
Blackpool	<p><i>Benefit fraud investigations</i></p> <p><i>Provision of specialist Housing Benefit advice</i></p> <p><i>Resident engagement</i></p> <p><i>Direct engagement with community groups (e.g. training)</i></p> <p><i>Working closely with young people to co-produce Quality standards and Charter of Rights</i></p>
Bristol	<p><i>Resident safeguarding reviews and development of safeguarding toolkit</i></p> <p><i>Resident / management interviews based on latest case law re: claimant support</i></p> <p><i>Contributed towards DWP Housing Benefit guidance with case studies for determining Housing Benefit exempt claims</i></p> <p><i>Development of an enhanced combined safeguarding questionnaire</i></p> <p><i>Interviews of those who had successfully moved through supported housing pathways and those who had not, in order to understand these journeys and any factors that contributed to their outcomes</i></p>
Hull	<p><i>Collaborative working / education / training for providers</i></p> <p><i>Legal service support</i></p> <p><i>Peer-led forums for providers to share good practice and discuss topics</i></p> <p><i>Tackling anti-social behaviour through collaborative working between different LA Teams</i></p>



*Addressing neighbourhood environmental and street scene issues through 'Love your Streets'*

*Scores on the Doors and investment in a new IT system to support this*

*Distribution of mobile phones (pre-loaded with key contacts) to residents*

*Survey of SEA residents to improve resident expectations*

*Development of risk / needs assessments and support documentation for use by Providers*

# 4. Methodology

## 4.1 Overall approach

The diagram below summarises the approach that Kantar Public took for the evaluation of the pilots. The combination of quantitative data analysis with in-depth qualitative research has allowed for the collection of rich insights into each pilot’s activities and early outcomes, and how learnings from these can be applied at a broader level. This report captures findings from all evaluation activities undertaken.

Figure 3: Familiarisation and Research Design Methodology

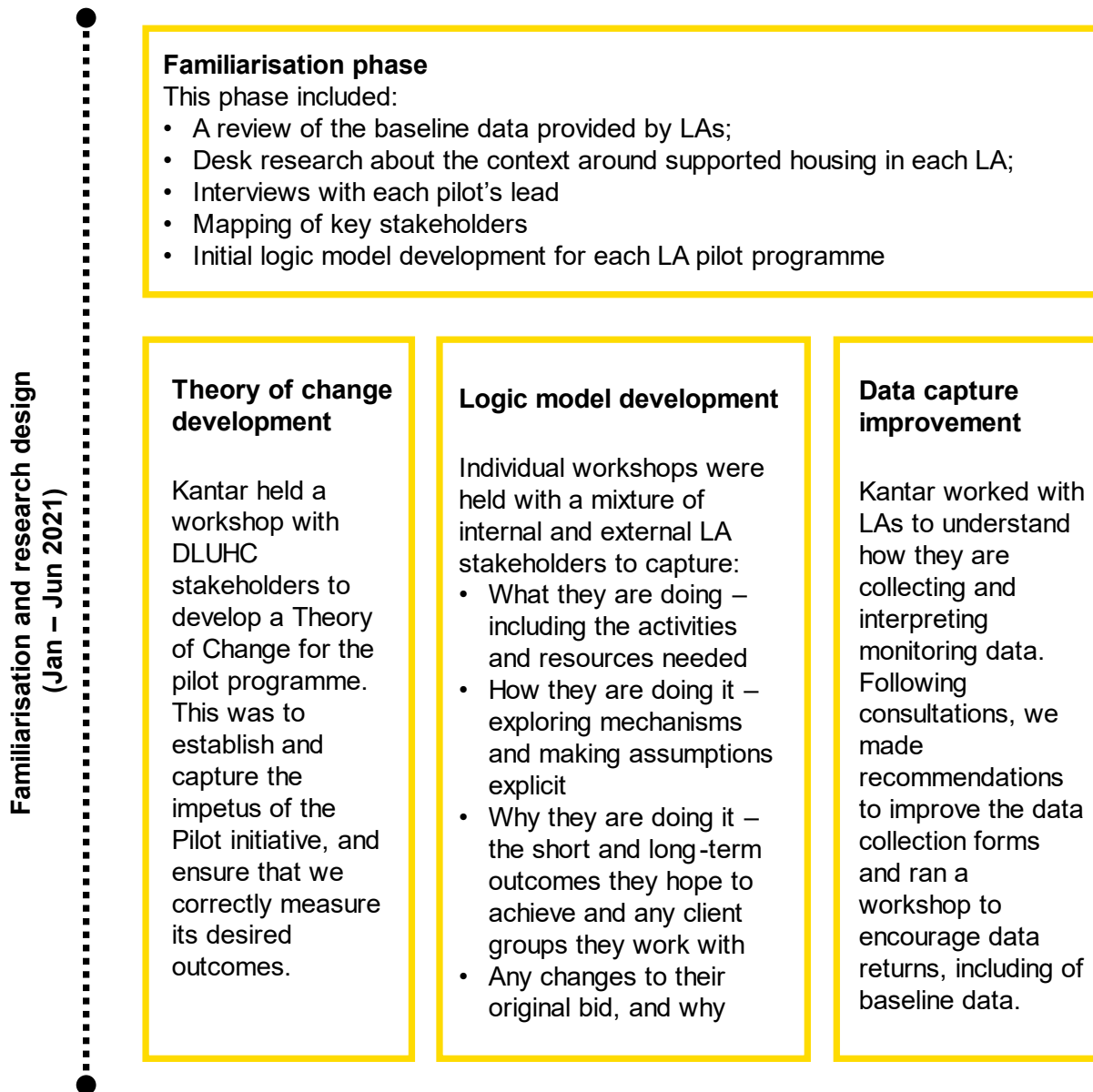
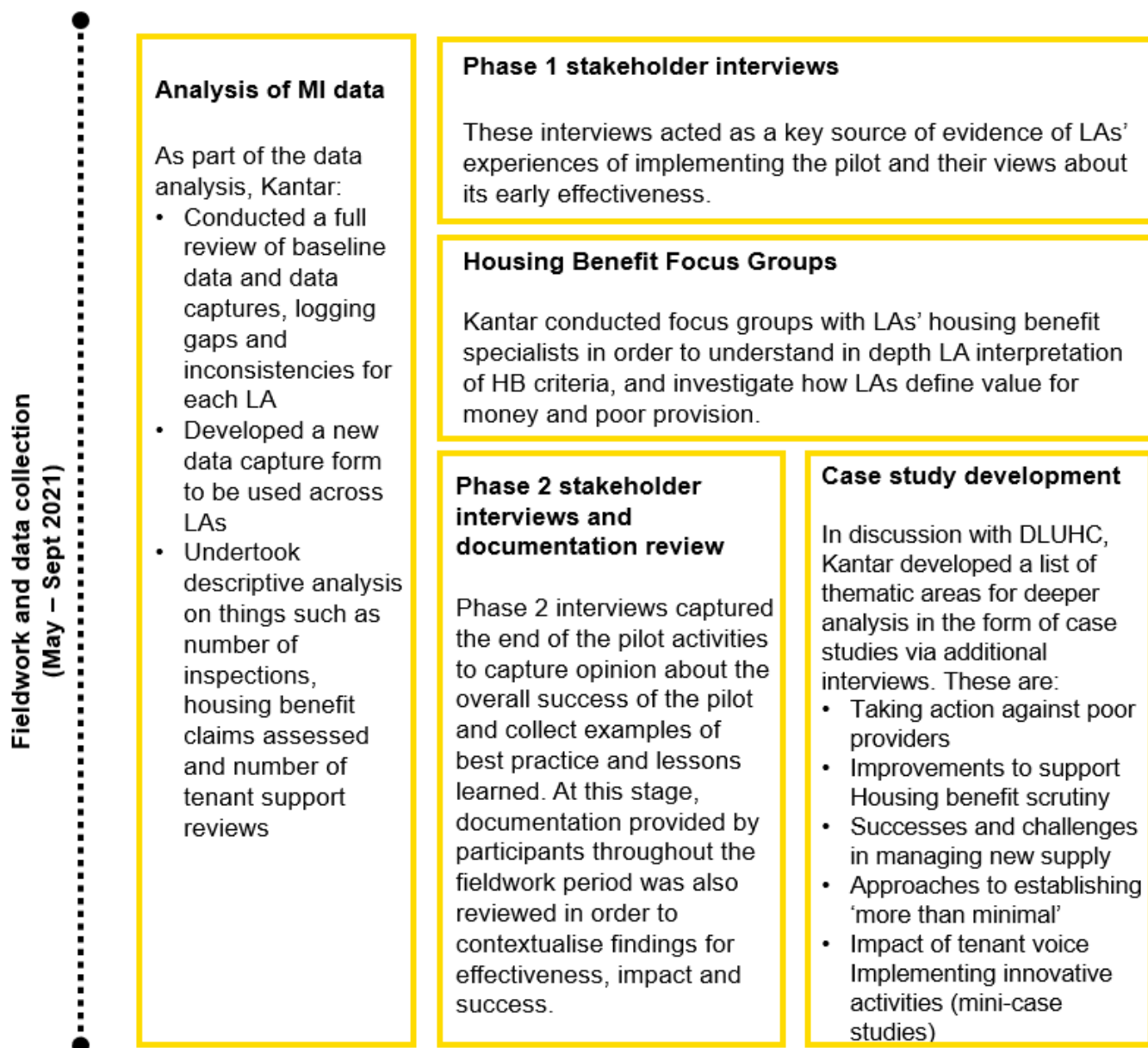


Figure 4: Fieldwork and Data Collection Methodology



## 4.2 Familiarisation phase

Kantar Public conducted five familiarisation interviews with pilot leads between 9<sup>th</sup> February and 12<sup>th</sup> February 2021, of which one was paired with the two local authority leads from Blackpool. These interviews were one hour long and conducted over Zoom or Teams software. These interviews aimed to:

- Understand the interventions LAs were implementing and experience of implementation so far, to feed into development of an overall programme logic model;
- Understand the background to the pilots, including the pilot lead's expectations around the need to use enforcement and the key stakeholders of the pilot;
- Explore LAs' own monitoring and evaluation activities to shape the support and materials Kantar should provide them with;
- Find out how LAs were collecting data about the pilots;
- Record any lessons learned at this point in the pilots.

The standardised discussion guides for these interviews can be found in the Appendix on page 102.

## 4.3 Theory of Change and logic model development

To document what each local authority hoped to achieve through the pilots, Kantar Public ran logic model workshops with each local authority. Using the information submitted in the bids and the familiarisation interviews with local authorities, draft logic models were presented to each and refined through the workshops. The logic models document:

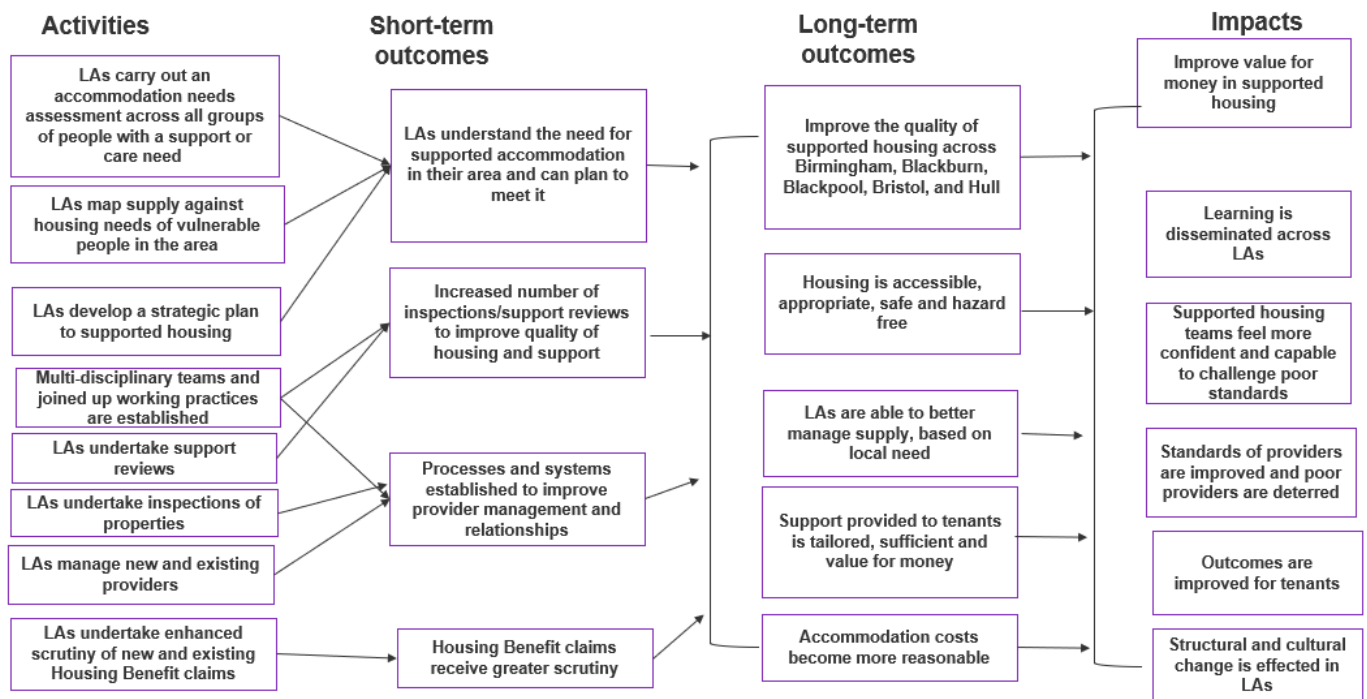
- Context within the area;
- Activities undertaken as part of the pilots and the resources needed;
- The short and long-term outcomes local authorities hoped to achieve through the pilots;
- Any changes to their models since their original bids.

Following on from individual workshops, Kantar Public developed a Theory of Change for the overall funding/programme, to establish and capture the impetus of DLUHC's Supported Housing Oversight Pilots initiative and to identify indicators of outcomes. A Theory of Change workshop was held with DLUHC and DWP stakeholders to:

- Define the problem or need;
- Identify the long-term aim or goal (impact);
- Identify the long-term outcomes;
- Identify the short-term outcomes;
- Identify the activities needed to support the outcomes.

The Theory of Change was used to finalise the evaluation framework and to familiarise the participating local authorities with the impetus of the pilots. The finalised Theory of Change is shown below and is included in the Appendix on page 88.

Figure 5: Programme-level Theory of Change



Theories of Change are typically underpinned by a number of assumptions that particular conditions are in place for the impacts and outcomes to occur as a result of activities. For the pilots, DWP and DLUHC made the following assumptions:

- *Local authorities have been interested and engaged in the pilot / funding;*
- *Local authorities have been able to deliver outcomes within the funding stream;*
- *The evaluation is able to identify elements of best practice within the time period;*
- *Improvements to quality and value for money can be achieved without legislative change;*
- *Local authorities have the resources and determination to make changes to improve quality and value for money.*

#### 4.4 Data improvement, collection and analysis

At the start of the pilots local authorities were asked to complete monitoring forms every two months until completion. As part of our work to improve data quality, Kantar Public undertook a review of the baseline first set of data submitted by local authorities. Our review highlighted that the majority of local authorities were not reporting across measures (often because they had never previously captured data on some of the measures) or that across local authorities, measures were reported inconsistently. To ensure that data quality improved and that data could be reported cumulatively across pilots, Kantar Public consulted each local authority to understand the challenges to data collection and identify where inconsistencies in reporting occurred. Following this, the monitoring form was amended, in consultation with DLUHC, DWP and local authorities. Following this, a data improvement workshop was held to disseminate the new form to local authorities.

Following Kantar Public's work to improve data collection, local authorities were asked to provide revised monitoring forms from the start of the pilots (November 2020) and then for each two-month period until the end of the pilots in September 2021. The forms captured measures on:

- Quality of accommodation – number of inspections carried out, resident complaints received on accommodation, hazards identified, actions taken to improve standards, and training sessions completed;
- Quality of support – number of reviews of support undertaken, resident complaints received on support, safeguarding issues identified, and actions taken to improve resident support;
- Improved value for money – number of exempt claims targeted by pilot, number of new Housing Benefit claims rejected and accepted, number of Housing Benefit re-assessments carried out, Housing Benefit awarded (in total and average), rent and eligible service charges, and ineligible service charges;
- Delivery – time and resource required for inspections, number of support reviews per household, resources required for support reviews.

Using the complete set of data returns, Kantar Public undertook analysis of the data to identify any changes in activities and outcomes over the 11-month pilot period. The baseline data provided is limited as some local authorities have not been routinely collecting this information and are therefore unsure how reflective the baseline data submitted is for each category of the data return. To overcome the challenge of a lack of useable baseline data and to explore the outcomes in depth, Kantar undertook five discussions (one with each local authority), where we presented insights from their monitoring data and established the extent to which any changes could be attributed directly to the pilots. Where possible, data is reported cumulatively across the pilot as well as by local authority. As the context within local authorities varies, it is not possible to make comparisons across them.

#### **4.5 Phase 1 & 2 stakeholder in-depth interviews**

For the first phase of stakeholder research, Kantar Public conducted 19 in-depth interviews with internal and external stakeholders working across various pilot activities between 18<sup>th</sup> May and 16<sup>th</sup> June 2021. The interview sample was provided by pilot leads.

Phase two of the stakeholder research incorporated 25 interviews with external and internal stakeholders, encompassing both case-study and activity-specific interviews, including internal council employees, providers, and external partners. They were conducted between 1<sup>st</sup> September and 14<sup>th</sup> October 2021. The sample was provided by pilot leads although Kantar consulted the National Housing Federation about the provider context in pilot areas.

Figure 6: Phase 1 and Phase 2 stakeholder interview sample

Local Authority	Sample
<b>Birmingham</b> <b>Total: 9</b>	Phase One: 4 Stakeholders (4 x internal) Phase Two: 5 Stakeholders (4 x internal, 1 external)
<b>Blackpool</b> <b>Total: 10</b>	Phase One: 4 Stakeholders (3 x internal, 1 external) Phase Two: 6 Stakeholders (4 internal, 2 external)
<b>Blackburn</b> <b>Total: 8</b>	Phase One: 4 Stakeholders (3 internal, 1 external) Phase Two: 4 Stakeholders (4 internal)
<b>Bristol</b> <b>Total: 7</b>	Phase One: 3 Stakeholders (3 internal) Phase Two: 4 Stakeholders (3 internal, 1 external)
<b>Hull</b> <b>Total: 10</b>	Phase One: 4 Stakeholders (3 internal, 1 external) Phase Two: 6 Stakeholders (5 internal, 1 external)
<b>All LAs</b> <b>Total: 44</b>	Phase One: 19 Stakeholders (16 internal, 3 external) Phase Two: 25 Stakeholders (21 internal, 5 external)

All interviews were between 30 minutes and one hour long and conducted over Zoom or Teams software. For Phase 1, interviews primarily focussed on understanding the activities and outcomes of each pilot at the time of fieldwork. Phase 2 had a greater focus on emerging outcomes, case study thematic areas and the status of activities as the pilots came to a close.

The standardised discussion guides for Phase 1 and Phase 2 interviews can be found in the Appendix on page 105.

#### 4.6 Housing Benefit workshops

Kantar Public ran two workshops on the 10<sup>th</sup> and 24<sup>th</sup> of August, designed to explore in-depth the ways in which local authorities have handled Housing Benefit claims and interpret regulations or legislation.

The objectives of the local authority Housing Benefit workshops were to:

- 1) Understand local authorities' knowledge and interpretation of Housing Benefit criteria with regards to supported housing;

- 2) Explore how local authorities have defined 'value for money' and 'cost effectiveness' when it comes to Housing Benefit and supported housing;
- 3) Explore how local authorities have identified 'poor provision' in supported housing, and identify commonalities and divergencies between local authorities;
- 4) Identify and explore the factors that drive cost and quality in supported housing.

Workshops were conducted on Teams and attended by individuals within local authorities with Housing Benefit responsibilities, including Housing Benefit leads or officers, and others involved in reviewing Housing Benefit applications. Workshops were guided by a topic guide aligned to project objectives, which is available in the Appendix on page 140.

#### **4.7 Case study development**

Kantar Public worked in collaboration with DLUHC and DWP to produce a list of seven intended case study topics to provide a greater focus on various policy mechanisms or pilot activities. The list of these is as follows:

- Approaches to interpreting 'more than minimal';
- Implementing innovative activities or partnerships (set of mini case studies);
- Impact of incorporating resident voice and lived experience;
- Taking action against a poor-quality provider;
- Improvements to support (tracking individual journeys and outcomes);
- Challenging Housing Benefit claims with innovative working;
- Managing new supply (successes and challenges).

Kantar Public drew on Phase 2 stakeholder in-depth interviews, the Housing Benefit workshops and document analysis to pull together materials for specific case studies.

#### **4.8 Limitations of the evaluation**

As with all research exercises there were some limitations to the method employed in the evaluation of the Supported Housing Oversight Pilots, based on budget, timing and participant requirements:

- Local authority stakeholders and their partners gave their time as generously as they could, but compromises had to be made on some workshop / group lengths to make sessions manageable for attendees. Therefore, there was more detail that might have been explored with more time, for instance around Housing Benefit processes;
- The pilot design and length did not allow for the formation of comparison groups, which would be a pre-requisite for calculating robust impact estimates. Instead we have drawn on monitoring data and qualitative accounts of change to indicate progress and impact in the course of the pilots;
- Due to various factors (including a lack of pre-existing data and difficulties setting up monitoring processes) local authorities found it difficult to provide full and accurate monitoring data, which meant that some indices were difficult for evaluators to track over time;
- There was not a complete, usable baseline for the monitoring data, causing difficulties in tracking progress through the pilot period. Most LAs did not track such data before the introduction of the pilots. Kantar overcame this by asking local authorities to specify the extent to which they attributed any change in data to the pilot;



- The evaluation was conducted over the course of pilot activities and in the immediate post-pilot period. As a result, longer-term outcomes (occurring after October 2021) fell outside the scope of evaluation findings;
- The evaluation was centred around the outcomes and impacts as outlined in the Theory of Change, and as such did not seek to explore other impacts in depth.
- These methodological limitations mean that although there is some evidence of impacts, more robust evaluation is needed to determine to what extent supported housing provision can be improved without any changes in regulation or legislation.

# 5. Pilot activity

*This chapter outlines the various activities that local authorities have conducted over the 11 months of the pilots.*

## 5.1 Establishing multi-disciplinary teams

Establishing multi-disciplinary teams was considered a driving force behind the success of the pilots. Three types of relationships emerged as part of the pilot, as ways of bringing different disciplines and expertise to activities around supported housing:

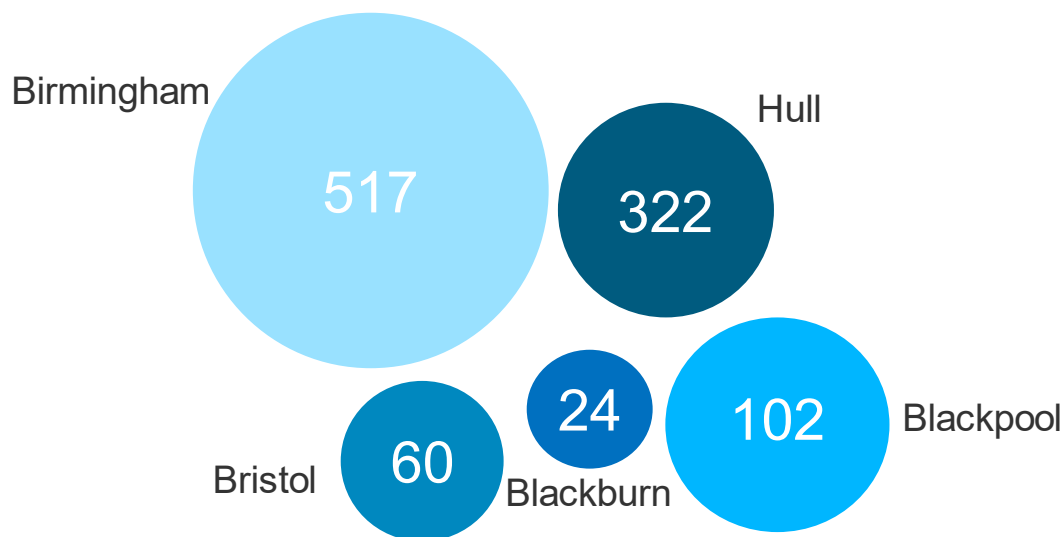
- Local authorities have made efforts to bring together different council teams (e.g. Revenue and Benefits teams (covering Housing Benefit), housing teams, homelessness teams, Adult Social Care, supported accommodation review teams, safeguarding, making every adult matter teams) to encourage joined up working to improve quality and value for money and provide a holistic assessment of need and supply within the local authority's supported housing sector. This was enabled via data sharing, to identify trends in cause and effect. For example, housing inspection teams were encouraged to report care and support concerns to the relevant teams if any concerns for welfare arose from a property visit.
- Relationships with external stakeholders: local authorities have set up functional networks and secondments with external stakeholders such as the police, the fire service, and homelessness charities. These external partners brought new skills, powers, perspectives and contact networks to approaching the pilot aims.
- Local authorities have also highlighted the importance of buy-in from elected officials, portfolio holders and wider council members to effectively set up the cross-council approach. Having senior support from these stakeholders was seen as important recognition of the issues with supported housing in some areas, and a means of progressing future solutions.

## 5.2 Conducting property inspections and enforcement

Local authorities have taken both proactive and reactive approaches to property inspections, depending on resource, COVID-19 restrictions, and the size of the local area's supported housing market. Inspections were carried out using a pro-forma to ensure that nothing was missed and were often conducted jointly by representatives from different teams in the council (e.g., environmental health or enforcement officers) and in some areas with external local partners (such as the fire service, who were able to provide expert advice on fire safety).

Across local authorities, there have been a total of **1,025 property inspections** undertaken throughout the pilots, as conveyed in *Figure 7* below.

Figure 7: Graphic showing number of inspections completed\*



\* Please note that differences between numbers of visits are due to variances in the nature of supported housing provision in the area. For example, Blackburn's inspections were of large, multi-occupancy accommodation, whereas Bristol's inspections included both single-occupancy and multi-occupancy accommodation.

Local authorities agreed that pilot funding had directly increased the number of inspections they were able to carry out due to the resources made available, especially in terms of staff time. Local authorities have been able to increase inspections in the following ways:

- Hull have doubled their team from two to four inspection officers, estimating that this doubled the number of inspections they could do.
- Blackburn estimated that they would have done few (or none) of the 24 inspections of the large, multi-occupancy accommodation units without the pilot funding, as they did not have the resource to do so previously.
- Bristol carried out 60 inspections during the pilot, which enabled them to inspect both multi-occupancy (38) and single-occupancy properties (22). Previously they could only inspect multi-occupancy properties.
- Blackpool undertook proactive inspections, estimating that they were able to 'significantly increase' the amount, quality and type of inspections carried out, compared with pre-pilot activity.
- Birmingham, which has the highest number of supported housing units of all the pilot areas, were able to increase the number of officers working on inspections. They estimated that without the funding they would have completed approximately 250 of the 517 inspections, but these would not have been to the same standard as those undertaken through the pilot.

Local authorities explained that if an inspection raised a cause for concern, authorities first tried to rectify the issue by speaking with the landlord, writing them a letter or sending them a schedule of requirements. If landlords did not act on this, then depending on the issue, repairs could be dealt with through issuing a working default (e.g. the council pays for works and sends the landlord a bill), a penalty charge notice, a prohibition order, or prosecution. Grounds for enforcement activities depend on the nature of the issue to be rectified, but those mentioned by local authorities included the Housing Act 2004 and the Environmental Protection Act 1990.

In addition to the pilots providing resources to increase the number of inspections, local authorities discussed how the approach to inspections had improved. This included having a more formalised approach to inspections (Birmingham), having the time to prepare for inspections (Blackburn),

utilising a multi-agency team which meant that inspections were more informed (Birmingham, Blackburn, Blackpool), and providing training for staff on the Housing Health & Safety Rating System (HHSRS) property standards (Birmingham). Blackburn reported that the pilot funding came at a critical time, since the council had been experiencing a backlog of complaints and inspections exacerbated by COVID-19. The increased resourcing, made available through pilot funding, helped them address this.

Some local authorities used the pilot to introduce new initiatives to help with the inspection process. For example, Hull, as part of their 'Love Your Streets' initiative, conducted informal inspections of properties while educating residents on proper and appropriate use of bins in the local community. Hull are aiming to improve their inspection work by formulating a 'Scores on the Doors' framework to rate providers, both in terms of their housing quality and support provision. Birmingham City Council also worked with external providers to promote a set of Quality Standards and a resident's Charter of Rights. These guide providers on the standards they should adhere to for the wellbeing of their residents.

### 5.3 Conducting care and support reviews

Local authorities carried out Care and Support Assessments or support reviews as part of the pilots, with the aim of improving the quality of support provided to residents and assessing the need for care, support or supervision.

Local authorities have taken varied approaches to Care and Support Assessments. The process typically involved the use of a multi-disciplinary team to run questionnaires or interviews among residents and/or support staff, a tour of the premises, and requests for copies of support files, plans or other evidence. If concerns were identified, they were typically reported to the landlord, but if there were regular or substantial concerns, or if teams processing the Housing Benefit claims flagged a particular concern prior to the assessments, they were referred to Housing Benefit for scrutiny to investigate the option of taking more formal action. Some local authorities used the time of existing staff experienced in this area, either within their own local authority teams (i.e. teams that pre-dated the pilot) or through secondments to conduct assessments. Others hired specialist resources or invested in training up teams to conduct the reviews. Support reviews require less time than inspections (ranging from 1 hour to 8 hours including preparation and review) and are often conducted by an individual or two officers.

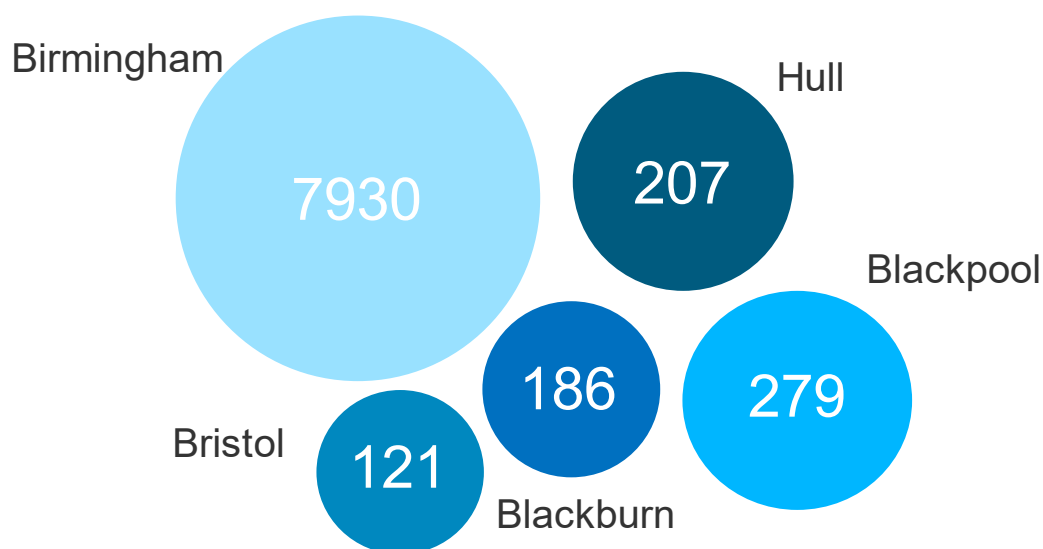
During the pilots, local authorities have visited a total of 8,723 households to complete resident support reviews. These reviews are defined as a review or check, undertaken by the LA, of the support received by an individual in exempt accommodation. This may happen at the first point a claim is submitted, or at any other time during the resident's residency. Local authorities have reported that they would have done far fewer reviews and/or that these reviews would not have included visits or resident interviews undertaken by suitably qualified staff without the funding from the pilot. Below is a summary of the support review data by local authorities:

- Birmingham completed **7,930 resident support reviews** through the pilot. Birmingham explained how they were able to support the wider pilot team (such as social workers) to make professional assessments of residents' needs. Where the inspections found evidence of less than adequate support, this was used by Birmingham's Housing Benefit team to inform decision-making regarding claims for specified accommodation. Previously, they had not undertaken any reviews of adult social care-funded support (and undertook 215 through the pilot). Additionally, they previously only conducted a support review in response to complaints, but were now able to undertake proactive follow-up reviews a couple of months after first receipt of a claim (resulting in 4,242 additional reviews);
- Blackpool completed **279 support reviews**. Previously, residents with a commissioned support package would be prioritised to receive an annual review but, through the pilot, local authorities have been able to increase the scope of reviews to cover non-

commissioned supported housing providers across multiple cohorts. Previously, residents with a commissioned support package would be prioritised to receive an annual review but, through the pilot, local authorities have been able to increase the scope of reviews to cover non-commissioned supported housing providers across multiple cohorts. providers.

- Bristol have undertaken **121 support reviews**, with pilot funding enabling them to spot-check provision, even where they were confident there was no cause for concern.
- Hull estimated that they would have completed fewer than 120 of the **207 support reviews** without the funding.
- Blackburn completed **186 support reviews** through the pilot; without the pilot funding they would have conducted no formal support reviews and would have been reliant on informal comments from residents.

Figure 8: Graphic showing number of unique households visited for resident support reviews



Over the course of the pilots, local authorities have reported that they improved their processes for conducting the reviews, including interview design and guidance, and the establishment of standardised recording of outcomes via pro-formas. Local authorities have broadly agreed that conducting support reviews in person was more beneficial than doing so over the phone as was the case during the peak of the COVID-19 pandemic in the UK. Bristol, however, thought reviews over the phone released pressure on residents.

#### 5.4 Conducting Housing Benefit scrutiny

For the pilots, local authorities have undertaken enhanced scrutiny of new and existing Housing Benefit claims.

The Housing Benefit scrutiny process usually involves identifying whether the eligibility criteria for specified accommodation as set out in the Housing Benefit regulations has been met, and then scrutinising the reasonableness of rents and service charges, including any annual increases. At each stage, Housing Benefit officers typically engage with providers to request more information about:

- The organisational structure and registration with relevant regulatory bodies (to check that providers are ‘not for profit’, in line with the landlord definition set out in Housing Benefit regulations);
- The amount and type of support provided (and how this is funded);
- Whether the individual needs and is accessing the support on offer;
- The nature of the accommodation provided;
- Evidence of actual costs, to check that claims are legitimate and reasonable.

The process for Housing Benefit scrutiny is highly resource-intensive, especially when background checks for more complex issues, like disguised profits, are conducted. In addition, the process and time needed are highly reliant on providers sharing appropriate information, which can take a long time. Local authorities also reported that providers are often supported or represented in this process by consultants who specialise in maximising income through Housing Benefit.

At the commencement of the pilot, local authorities were at different stages of development in relation to their expertise and approach to the scrutiny of specified accommodation claims. However, all have reported that they were already carrying out a good level of scrutiny prior to the pilots. Through the pilots, Housing Benefit teams have been able to increase the sources and depth of evidence used to make and verify their decision making, especially in relation to assessing care, support and supervision needs and provision, which most felt they lacked both the expertise and time to do effectively. New or bolstered multi-disciplinary teams included a range of other council departments, such as Adult Social Care, Neighbourhood teams, Planning, Housing Options, etc. and sometimes external agencies such as the police. This meant that decisions that might have previously been based solely on evidence supplied in writing by the provider were cross-checked with a physical inspection of the premises and interviews with residents. Housing Benefit teams were also able to expand the number of claims that received in-depth scrutiny (including through follow-up reviews) as a result of the additional resources gained through the pilots.

However, the aspect of scrutiny which perhaps benefitted most from increased resource and multi-agency working afforded by the pilots – that is, the assessment of whether the claimant needs and is receiving ‘more than minimal’ care, support or supervision – is also the area where local authorities have experienced the greatest limitations in terms of Housing Benefit regulations and structures. The pilots increased available resources, but did not change the extent of local authority powers:

*“We’re not doing anything new as a result of the pilots in relation to Housing Benefit. We can’t because we were already doing everything we could anyway. We now just do more of it.”*

- Local authority staff, pilot team

Interviews revealed the disparate nature of providers across and within the authorities. Accordingly, Kantar Public created the following typology from which providers can be described and identified:

- *‘Ideal-type’ providers*: providing high quality support and accommodation with residents’ well-being at heart. They charge reasonable rents and are very enthusiastic and responsive to requests for proof and information sharing. There is, however, some risk of resident institutionalisation or occasional misunderstanding of licensing and/or planning requirements. Relationships with these providers often improved as a result of the pilots, pleasantly surprising pilot teams. Through the pilots, Housing Benefit teams were able to build a clearer picture of the links between such providers and other parts of the authority. For example, they were able to identify those supported housing schemes which are being commissioned by other departments within the local authority and claimants who are in

receipt of adult social care packages. Some pilot authorities also identified that non-commissioned supported housing schemes which were previously assumed to accept a lot of referrals from out of the area were in fact receiving most of their referrals from the authority's own Housing Options (housing advice and homelessness prevention) team.

- *'Providers of concern'*: who might purposefully falsify information or attempt to disguise profits in order to substantiate specified claims or charge unreasonably high rents. Local authorities perceived them to be trying to take advantage of the Housing Benefit scheme for financial reasons, identifying ways to exploit legislation. Local authorities' relationships with these providers may worsen as a result of the pilots, since the increased resources and evidence available for Housing Benefit scrutiny may result in claims being reassessed or reduced. This may be because they do not provide even minimal care, support and supervision, because they are in fact profit-making organisations, or because they charge unreasonably high rents or service charges. When challenged, they tend to invest substantial amounts in legal or consultancy support. Discussions regarding these providers often dominated interview content.
- *'Misinformed' providers*: the motivations of this group are not as clearly defined, but what distinguishes them from others is a misunderstanding of what is required in the borough, or the standards required for supported housing. They have been observed to:
  - Incorrectly inform residents that the accommodation satisfies the criteria for specified exempt or for any category of specified accommodation;
  - Set up accommodation that does not adhere to fire safety standards;
  - Have the incorrect licensing or planning permissions.

Local authorities have been more likely to communicate informally with these providers, sending out letters or information leaflets. They may be encouraged to attend provider training and engagement sessions and may be willing to receive feedback to improve their provision or agree to support their residents to claim Universal Credit housing component, rather than Housing Benefit, to cover their accommodation costs.

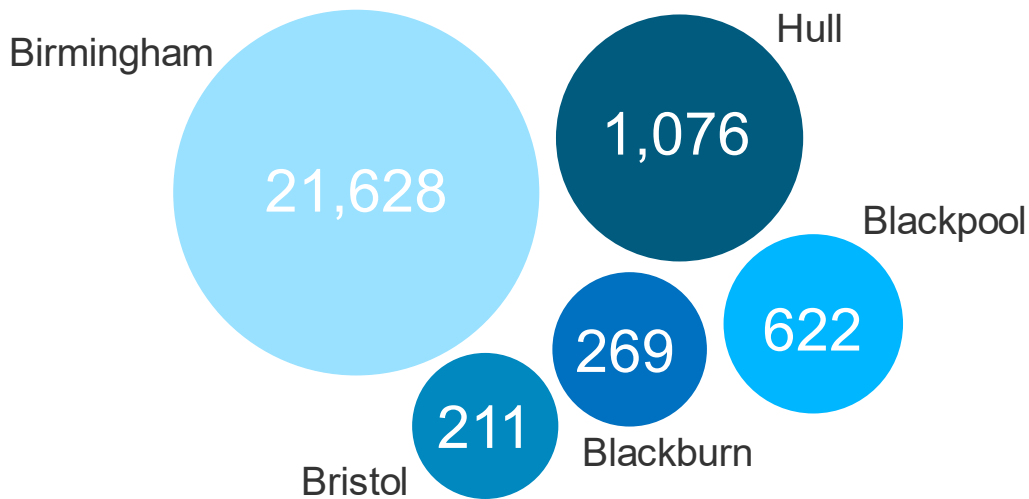
As expected, there is variation in the number of specified accommodation claims which were targeted<sup>5</sup> across the local authorities due to the size of each authority and the number of supported housing units in each area. As shown in Figure 9 below, Birmingham targeted the highest number of claims, while Bristol targeted the lowest number of claims. The total amount of Housing Benefit awarded also varies across local authorities due to factors such as regional variations in rent and differing types of provision.

A total of **22,850 exempt accommodation claims** were **targeted** through the pilots, with 622 in Blackpool, 211 in Bristol, 269 in Blackburn, 1,076 targeted in Hull and 21,628 in Birmingham.

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<sup>5</sup> Targeted claims are those selected by local authorities for scrutiny over the course of the pilot.

Figure 9: Graphic showing total number of exempt accommodation claims being targeted in pilot



Local authorities reported that the funding received for pilot activities had significantly improved the process of Housing Benefit scrutiny in both quantity and quality. This has included:

- Regular and detailed information-sharing about providers with other teams externally and internally;
- Being given the resources to conduct scrutiny at more regular intervals, facilitating a more proactive, rather than reactive approach;
- Improving communication and receipt of information with providers, either by establishing templates and processes for requesting information, or via improved relationships with them.

## 5.5 Strategic planning

As part of the pilots, local authorities carried out a range of activities to better understand demand for, and supply of, supported housing in their area. This revealed what improvements need to be implemented and prioritised in relation to the amount and type of supported housing required; referral criteria and pathways both into and out of provision; and factors which might influence future demand. Strategic plans form the basis of future commissioning gateway approach activities, and marketing position statements in relation to supported housing.

There were three key areas of focus, with a number of different types of data collected and analysed to inform each:

**Current supply and usage of supported housing:** information collected/ collated and reviewed included:

- Number of units/ size and layout of schemes;
- The landlord and support providers and whether, how and by whom support is commissioned or otherwise funded;
- The intended client group, their objectives while in supported housing, and length of stay;
- The actual profile of clients and length of stay;
- Referral sources, processes and criteria;
- Resident experience and outcomes (both in terms of wellbeing and move-on);
- Costs



Data held by the Housing Benefit teams relates to individual claims, and support may be commissioned by a number of different departments within the local authority (and/or by the NHS or criminal justice system), or not commissioned at all. Therefore it represents a significant piece of work to draw this information together in one place, and local authorities were at different stages in this at the start of the pilots. In order to build a picture of the supply and usage of non-commissioned supported housing, some of the larger authorities such as Birmingham and Hull have conducted provider surveys (see further details in the Hull case study below). Both received a decent response to this voluntary exercise; in particular in Hull, where the survey was conducted by the independent national membership body for homeless support providers, Homeless Link. Authorities then triangulated this data – for example, Birmingham found that, for those providers who had responded to their survey, there was a relatively good match between what residents and providers were telling them about the support being provided. Blackburn tracked individuals' supported housing placements over time, and realised from this exercise that length of stay in current placement only told part of the story; some had been moving around schemes for many years.

### **Developing or refining a typology of supported housing**

Having established a more detailed picture of what supported housing is currently being provided in their areas, local authorities have carried out various activities to further develop their understanding about:

- The sub-categories that are most useful when considering the different types of schemes. For example, there was considerable reflection on whether and how 'short-term' and 'long-term' provision might usefully be distinguished;
- The implications of these different categories for local authority oversight moving forwards. For example, Housing Benefit teams recognised that, in long term accommodation where care and support were often being commissioned, Housing Benefit scrutiny might be best focused on checking whether the amount of 'intensive housing management' being charged by the landlord is legitimate;
- The definition and measurement of 'successful' outcomes, and which factors influence these. (See for example Bristol's work further exploring the links between size of scheme and 'successful' move-on in the case study below);
- The types of settings associated with the best outcomes for people with different needs and characteristics. (See, for example, both Bristol and Hull's work in the case studies below to create an evidence-based business case for the development of dispersed models, such as Housing First for those with multiple and complex needs for whom the current homelessness pathway is not working);
- The role that different types of supported housing play in health, social care, criminal justice and homelessness pathways and systems. For example, understanding whether and how non-commissioned supported housing is being used by local authorities to meet their duties under the Homelessness Prevention Act 2017.

These activities included 'concentrated thinking' and targeted data collection activities to better understand the link between residents' characteristics, different models of supported housing, and outcomes. In order to understand resident outcomes in supported housing (i.e. why some people thrive within supported housing and some do not), two main activities were carried out. Firstly, data collection and analysis were undertaken. This was to identify trends<sup>6</sup> around the types of

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<sup>6</sup> It was noted that trends were sometimes hard to identify in light of the effects of the Covid-19 pandemic.

people who are referred to supported housing, and whether there are any characteristics that may drive their success or failure within supported housing. Data consulted included information from benefits systems, homeless and housing data, crime data and unemployment data. Secondly, in some areas such as Bristol and Hull, interviews were carried out with residents to understand more about their experiences. In Hull, interviews have focused on residents' history, how they ended up in supported accommodation, and the type of support they receive. In Bristol, interviews focused on questioning cohorts of people who had successfully progressed through the supported housing pathway to general needs accommodation, and those who had not, in order to better understand barriers and enablers.

### **Assessing demand for supported housing**

In order to inform their future commissioning of supported housing and/or their gateway approach, local authorities tested different methodologies to estimate the need for different types of supported housing. This is a complex area because authorities recognise that demand is influenced by a number of other factors, e.g.:

- Success of homelessness prevention – if individuals are prevented from becoming homeless in the first place then there would be a reduction in need for supported housing as this is the stream where many individuals living in supported accommodation come from;
- Access to affordable mainstream housing – a greater availability of affordable housing would mean less reliance of those with more minor support needs on supported accommodation;
- Movement of people between local authorities – the coming and going of individuals means there is a constantly fluctuating demand for supported housing.

During the pilots, local authorities attempted to collect and/or analyse a number of different sources of data to inform this modelling:

- Homelessness Case Level Collection (H-CLIC)<sup>7</sup> data – to better understand the link between statutory homelessness activity and demand for supported housing, e.g.:
  - Eviction from supported housing as a cause of homelessness (Blackpool stated that they intend to monitor whether changes brought about through the pilot will impact on this key outcome over time);
  - 'Homeless flows' – the point at which people present in the system and with which outcomes, especially in relation to supported housing placements (Hull – see case study below);
  - Demographics and support needs: some authorities were able to disaggregate support need data by different client groups (e.g. single people or by gender); some were able to develop and test improved 'triage' and recording of support needs by Housing Options at the point of referral into non-commissioned supported housing.
- Indicators of current under-/over-supply: for example, Blackburn with Darwen collected data on void rates in current provision. They compared this with feedback from Housing Options and Probation workers who regularly refer into this provision to understand whether they perceive supply to be adequate;
- Comparing per capita number of SEA claims with other cities (e.g. Birmingham found their per capita rate was 2.5-3.5 times higher than other comparable cities);
- Movement between local authorities: e.g. Birmingham attempted a number of approaches to evidence the number and source of out of area referrals into supported housing within the city. This included: a survey of providers (though this was challenging since it was a voluntary exercise, and they felt that providers sometimes told them what they thought they

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<sup>7</sup> (H-CLIC) Homelessness Case Level Collection is a dataset which housing authorities are required to collect and report to DLUHC in order to monitor the implementation of the Homelessness Reduction Act 2017

wanted to hear about referral sources), and Probation (where they encountered barriers to information sharing, including a suspected reticence to quantify out of area referrals, which might be counter to Probation service protocols).

Local authorities reported that difficulties in accessing barriers mainstream (e.g. social general needs or affordable private rented sector) housing have two main impacts:

- In the face of significant barriers to re-housing, there is a risk that supported housing becomes the default option for single homeless households, regardless of support needs and suitability;
- Lack of affordable housing supply hinders local authority plans to develop alternative housing and support models, e.g. Housing First.

Some authorities modelled these impacts. Birmingham looked at the possible impact of changes in Local Housing Allowance rates on future demand for supported housing.

## **5.6 Managing new provision (gateway approach)**

A gateway approach is the implementation of structures and processes in an attempt to better manage the supply and suitability of new supported housing provision in an area. There are limitations to local authorities' power to prevent new schemes being established. Nevertheless, the pilots tested whether, with improved communication between departments, a clearer understanding of what is needed locally, and the implementation of standardised processes, 'providers of concern' could be prevented or discouraged from setting up or expanding in an area; and the plans of 'misinformed' or 'ideal type' providers could be influenced where necessary. Part of the challenge in some authorities prior to the pilots was that prospective providers might make enquiries to different departments and receive inconsistent or unclear responses. No single department had oversight and the Housing Benefit team could not advise on the need for or over-supply of a particular type of provision.

Generally, there were four main activities that local authorities carried out as part of their pilot gateway approach:

*Talking with providers and setting expectations* – when a new provider wants to set up supported housing, local authorities have spoken to them to be clear about the standards of housing and support they expect, and the type of provision that is required in the local area.

*Doing background research and questioning the provider* – background research involved:

- Searching for the provider online, e.g. to check whether they are a Registered Provider, charity or Community Interest Company (and would therefore meet specified accommodation requirements of being a not-for-profit organisation);
- Identifying whether or not the support has been commissioned by the local authority or, if not, whether there is strategic fit (e.g. with the council's Market Position Statement);
- Identifying the status (and thus requirements) of the property from a planning and HMO licensing perspective.

Local authorities have typically asked providers to fill in a questionnaire to gather more information, for example about organisational structure, leasing arrangements, projected costs, staff numbers and total hours worked, and proposed rent and service charges. Local authorities then scrutinise this information to make sure that they are satisfied with the quality of the accommodation, and that the proposed model represents value for money. Particular attention is given to financial information to make sure that rent and service charges align with provider running costs and represent good value for money from the perspectives of both residents and the public purse. Where these do not align, the local authority can ask the provider to reduce the

rent/service charge that they charge the resident, at least until they can generate evidence of actual operating costs.

*Scrutinising provider paperwork* – Local authorities have asked providers to submit certain paperwork to make sure that they satisfy the criteria required to be a supported housing provider. This may include support and risk assessments. Hull are developing templates for providers to use where they do not have their own version. Not only does this make things easier for the provider, but this standardisation will make it quicker and easier for the local authority to scrutinise claims. Once the local authority is satisfied that the claim meets all the relevant criteria, they process the Housing Benefit claim.

*Conducting a visit to the property* – this is done to make sure that the information in the Housing Benefit application is accurate, for instance by verifying that services charged for by the landlord actually exist. If possible, this should be done at short notice so that the provider does not have the chance to make improvements to inflate perceptions of what they are providing.

Further examples and case studies relating to pilot gateway approach activities are included in section 9.2.

## **5.7 Co-production and resident voice**

Most local authorities conducted at least some pilot activities with the cooperation of residents in order to make sure that pilot outcomes are relevant to and reflective of their needs. Some local authorities, such as Blackpool and Blackburn, have specific ‘lived experience’ teams which specialise in liaising with residents. Blackburn in particular examined lived experience via a partnership with Shelter and the establishment of a specific officer role to visit large Houses of Multiple Occupancy (HMOs); these actions helped to build on relationships with residents to gain trust and better understand their experiences. Birmingham promoted a supported housing ‘Charter of Rights’ which was developed with current and past supported housing residents prior to the pilot. Blackpool also co-produced Quality Standards and a Charter of Rights with residents, led by an interviewing team with lived experience. Other local authorities have engaged with residents as part of general pilot activities (e.g. talking to them as part of housing inspections and care and support reviews).

## **5.8 Landlord and/or provider trainings**

Some local authorities delivered training to landlords and/or providers to help them provide good quality supported housing. For example, Hull provided a twelve-month package of free training for providers (which extends beyond pilot timelines) and Blackpool Council facilitated training for newly approved providers. While it was not formal training, Birmingham’s commissioned partners ran best practice workshops around the Quality Standards and Charter of Rights initiatives (i.e. on residents’ rights within supported housing and what providers’ obligations are to meet these rights). As expected, COVID-19 required training to be delivered remotely, but this still proved successful.

According to the monitoring data, through the pilots, 396 training sessions were delivered to landlords/providers and 96 to agencies by Hull and Blackpool; Hull have delivered the majority of these. These local authorities discussed how they were able to start training providers (having previously not offered this option) or expand the types of training they provide due to the resources available through the pilot. While local authorities were still collating feedback on the impact of the training at the time of the interviews, they were confident that it was of a good standard because organisations returned for additional training.

Figure 10: Graphic showing number of landlord/provider training sessions completed (i.e. a pre-prepared training session)



Figure 11: Graphic showing number of agencies trained



Many stakeholders reported that the funding provided was crucial for undertaking pilot activities, enabling teams to ring-fence staff resource into multi-disciplinary teams to conduct inspections and Housing Benefit scrutiny. Without this funding, it was established that increased inspections, scrutiny and enforcement simply would not have been possible.

*“It’s given us resource to tackle some of the systemic issues the city’s been dealing with over a number of years and its allowed us to target some of that critical work in terms of work that needed to be done in communities”*

- External pilot partner

Figure 12: Funding provided to each local authority for pilot activities

Local Authority	Round 1 funding	Round 2 funding	Total funding received
Birmingham	£ 1,048,244	£756,000	£1,804,244
Blackburn	£ 356,616	£69,622	£426,238
Blackpool	£686,648	£729,648	£1,416,296
Bristol	£249,099	N/A	£249,099
Hull	£798,485	£841,053	£1,639,538
<b>Total</b>	<b>£ 3,139,092</b>	<b>£2,396,323</b>	<b>£5,535,415</b>

The extension of the pilot timeframe was also universally considered a positive development, allowing authorities a longer length of time to establish efficient and effective processes and partnerships. Many reported that, given the ongoing COVID-19 pandemic, it would have been very difficult to observe the impacts of the pilot within a shorter timeframe.

Incorporating ‘lived experience’ into the pilots was commonly seen as an essential element for ensuring positive outcomes. Hearing the voices of residents via co-production, inspections and care and support assessments has been crucial for determining what kind of support is needed

and being provided. It has also improved understanding of, and strengthened referral pathways that are provided by external agencies. In some cases, this has successfully resulted in the movement of a few residents into general needs housing, even at this early stage.

Establishing multi-disciplinary teams and partnerships which are open to changes to processes (both internally and externally) was often considered essential for successfully conducting the pilot. Having strong pre-existing relationships set a positive precursor for both efficiently improving processes and communication and for forging new ones.

*"We are doing a lot more closer working together, talking a lot more and issues get raised straight away... it's been a really worthwhile exercise from that point of view"*

- Local authority staff, Housing Benefit team

## **5.10 Barriers and challenges**

### **5.10.1 COVID-19**

COVID-19 was identified across pilot areas as a key barrier to conducting property inspections, care and support assessments and other pilot activities. In most cases, proactive inspections had to stop completely, and while some elements of inspections could be carried out remotely, this did not enable a holistic picture of each accommodation to be formed.

While 'lockdowns' were in place, scheme visits could only be conducted if there was an emergency with maintenance (e.g. hazard that would cause a threat to life), safeguarding, or anti-social behaviour. Inspectors had to ensure that they were 'covid compliant' (e.g. wearing PPE, not having too many people visit at one time) and complete risk assessments to mitigate COVID-19 infection. COVID-19 infection and isolation orders resulted in repeated inspection delays and/or cancellations. Some stakeholders reported that landlords may have been deliberately postponing inspections by claiming residents had tested positive for COVID-19, or making sure that inspections took place when residents were absent. Many local authorities experimented with conducting care and support assessments over the phone. It proved difficult to get in touch with residents, who may not have phones or who share phones with others. As pilots progressed however, local authorities reported that they were able to complete the in-person inspections that COVID-19 had delayed.

Beyond this, COVID-19 has resulted in a difficult environment for hiring appropriately specialist resource (for example, environmental health officers), meaning that some local authorities have had to alter their plans with regards to resourcing pilot activities. Local authorities also received guidance during the pandemic to limit enforcement activity unless it was necessary to conduct.

### **5.10.2 Limited staff resource**

Despite planning, limited staff resource was also flagged as a barrier to conducting pilot activities. This was a greater issue for those utilising existing staff resource, and those relying on the willingness of staff to work above and beyond their usual roles.

*"I think it's worth saying that it has been far more challenging than any of the pilot authorities anticipated. Not just with COVID and the pandemic, but probably an underestimation of the resources required for some of these activities, whether it be report reviews or inspections, we probably underestimated what it takes to get the deliverables accomplished."*

- Local authority staff, Housing Benefit team

Those who hired in new resources were more likely to experience 'learnings' over the course of the pilots where expertise is particularly important, such as in adapting the design of questionnaires used for care and support assessments or Housing Benefit scrutiny. All local authorities reported that processes for recording and sharing information between teams significantly improved through the use of new templates or regular meeting times. There were also important reflections from local authorities about the particular skills and expertise required to

undertake some aspects of the pilot's activities, such as technical knowledge of the Housing Benefit regulations or someone who is suitably skilled to assess support needs and provision of a wide range of client groups.

### **5.10.3 Partnerships**

While most partnerships work well, they are not without their shortcomings. Some teams expressed a desire for better communication with other local authority teams who were quite insular or had differing priorities, believing that information sharing would be mutually beneficial. At times, bureaucracy within local authorities has hindered cross-directorate working, with data sharing authorisations requiring several levels of approval. Teams within local authorities have often worked in isolation, so it is sometimes difficult to get different departments to talk to one another in a timely manner.

### **5.10.4 Cooperation with providers**

A few local authorities expressed concern about the effect of the pilot on the cooperation of landlords and providers in various pilot activities (such as Blackburn's difficulty in setting up a triage system due to lack of cooperation from providers). This was particularly of concern given that scrutiny of their activities and functioning have increased, and in some cases been widely reported by the media. Greater awareness of the pilots and increased scrutiny may result in a deterioration in relationships between local authorities and some landlords or providers, and therefore act as a barrier to the pilots.

### **5.10.5 Regulation and difficulties challenging poor standards**

To avoid jeopardising provider or landlord engagement, many authorities followed government COVID-19 guidance on enforcement and started with informal approaches to scrutiny, inspections and enforcement. These authorities only moved to formal action when it was considered absolutely necessary, or where they were dealing with a provider with a history of poor performance. However, local authorities reported struggling with enforcement activity when escalation was needed. Several factors were mentioned around this difficulty:

Enforcing Housing Benefit regulations can be time-consuming, particularly if a claimant appeals the decision and the case goes to tribunal. Appeals must be made within one month of the decision, but this can be extended for a further 12 months if compelling reasons are given for lateness. Waiting times for a case to reach tribunal may add to this. Local authorities reported feeling reluctant to reassess, reduce or reject Housing Benefit claims for fear of the resources involved in having to defend their decision at tribunal and the risk of the claimant's appeal being successful. Legal representation at first-tier tribunal is not required and it is for the local authority to decide on their approach. Local authorities described the legal costs of the tribunal, and the time it takes them (or consultants or legal experts acting on their behalf) to collate evidence and information. There is a value for money consideration here – if a tribunal does not rule in the local authority's favour, then there is or could be a perception that a significant amount of money will have been "wasted". The local authority is then mandated to pay ongoing and retrospective Housing Benefit at the rate they originally challenged (and usually under the specified exempt category, which – if the landlord is a Registered Provider – means that it can be more difficult for the local authority to challenge unreasonably high rents, see S8.1.4 for further discussion).

There has also been a strong perception that cases which are appealed at tribunal are frequently decided in favour of the appellant; local authorities reported this is most commonly due the low threshold and lack of definition of 'more than minimal' care, support and supervision within the Housing Benefit Regulations and case law. It is easier for the provider to make the case that they *are* providing 'more than minimal' care, support and supervision than it is for the local authority to

make the case they are *not*, especially where residents provide testimony. Officers were concerned that residents were being pressured into testifying that they are receiving support that is needed and valued, perhaps on fear of eviction, and were also concerned that low resident expectations about the standard of support that should be provided may reduce the reliability of these statements. Providers also often pay for professional barrister representation for the resident.

Since Housing Benefit is claimed by the individual, local authorities expressed concerns about the impact on the individual of reassessing, reducing or rejecting their claim; this can cause additional stress to vulnerable individuals and rent arrears to build up. Even if the landlord allows the resident to remain in situ whilst the decision is appealed, in short-term supported housing, a resident may have moved on before the case is resolved, leaving uncertainty around arrears for individuals who already face substantial barriers to accessing housing. Changes to decisions on claims may trigger eviction or abandonment, and whilst tribunal panels are trained and experienced in dealing with a wide range of appellants with individual needs, local authorities were also concerned about the emotional impact on residents who are called to provide testimony at tribunal.

Despite these challenges in relation to the regulatory framework surrounding Housing Benefit and specified accommodation, the pilots have had some impact on local authorities' confidence to take action in relation to Housing Benefit claims:

*“As part of the pilot, we have made decisions based on evidence and law, and if that results in appeal then we need to follow through with these, because that is what the pilot is asking us to do. One of the impacts has been that we have been more willing – because of the pilot – to act on the evidence in front of us..... the evidence gathered by the [multi-agency team] will hopefully counterbalance the impact of having the tenants standing there in court.”*

- Local authority staff, pilot team member

However, given the timescales of the appeals process in comparison to those of the pilot, local authorities were not yet certain how many of their Housing Benefit decisions are upheld and how many might yet be overturned by tribunal.



## 6. Enforcement activity and improving quality of accommodation

*This chapter focuses on the intended early outcomes and impacts of the pilot related to the quality of accommodation (as set out in the pilot Theory of Change) which are:*

- *Challenging poor accommodation standards;*
- *Improving the quality and standards of supported housing;*
- *Ensuring that supported housing is safe, accessible, appropriate and hazard-free.*

*Key findings:*

- *Local authorities effectively used informal enforcement activities to improve quality and standards of housing, including the removal of hazards and other activities that improved accommodation safety.*

### 6.1 Challenging poor accommodation standards

**Overall, few formal enforcement activities were conducted over the course of the pilots, with local authorities instead utilising informal enforcement activities to challenge poor accommodation standards.** This approach was largely due to:

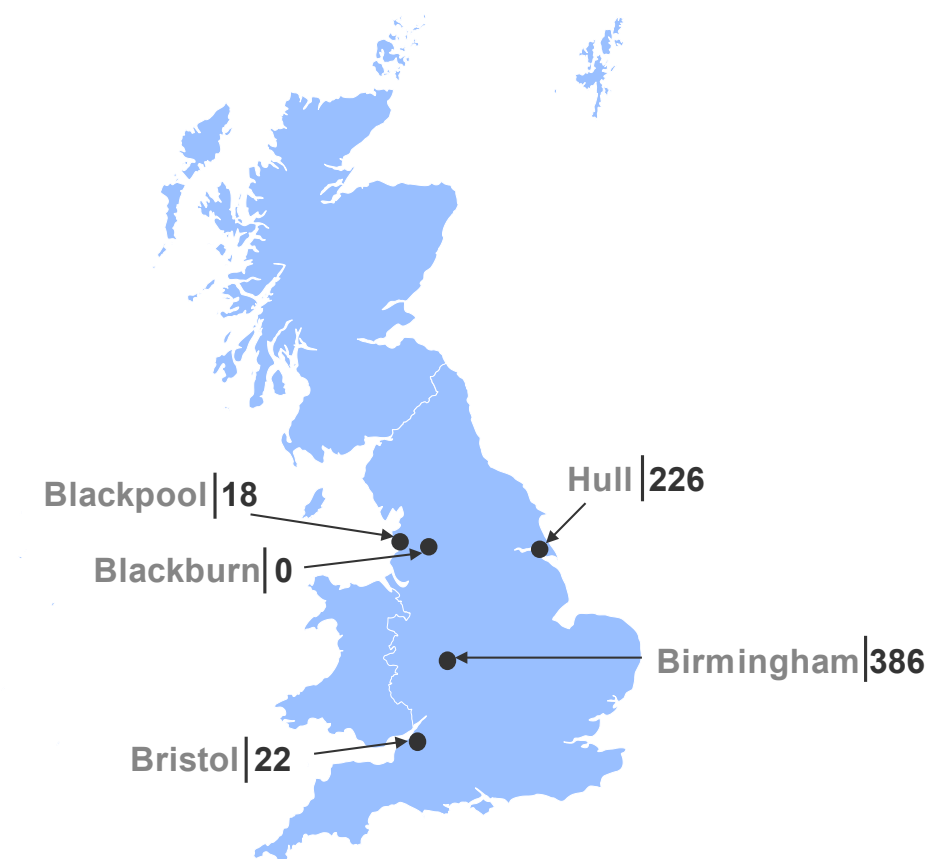
- Low thresholds for accommodation standards in the Housing Act;
- An impetus to retain positive relationships with providers;
- The fact that the enforcement process takes a long period of time and is cost-intensive (and may also mean that enforcement fell outside of evaluation timelines and scope);
- The presence of COVID-19, government guidance discouraging formal enforcement during the pandemic where appropriate, and a national shortage of enforcement housing officers.

'Formal' action for local authorities referred to legal action, whereas informal action often referred to actions that fell outside of these parameters including offering advice or recommendations (via emails, writing or face-to-face engagement) or requesting timescales for the start and completion of any works. All of the actions taken by Birmingham were informal as they did not have a housing officer who could take legal action, but they also preferred to deal with these issues informally to maintain a good relationship with providers. This sentiment was shared by Blackburn have also prioritised maintaining a good relationship with providers. They noted they were frequently in touch with their providers, which included having a housing officer visit properties once a week as an informal visit to help to ensure accommodation was of a high standard. Hull too, have not taken as many formal actions as they would have expected to, as they had been restricted by COVID-19 and related government guidance discouraging formal action unless absolutely necessary during the pandemic. Hull reported that formal action would be taken when pandemic conditions allowed and circumstances required it.

“We didn’t really find the need to use any formal action because the property standards when we inspected were not seriously poor. We prefer to use informal notices because that helps us retain a good relationship with the provider... we need to have a conducive relationship work to improve things as much as we can... formal enforcement also uses a lot of resource.”

- Local authority staff, pilot team member

Figure 13: Graphic showing number of formal and informal actions taken to improve accommodation standards



Local authorities undertook 652 formal and informal actions to challenge accommodation standards. These types of actions included informal letters to providers, hazard awareness notices, improvement notices and an emergency remedial action.

### Case Study – Taking action against a poor-quality provider (Birmingham)

Stakeholders in Birmingham shared an example of taking action against a large provider over the course of the pilot.

The provider was a private company that had been established at least a few years before the pilot, with a head office based in London, and around 1000 units in Birmingham. Residents included a mix of those with complex support needs including mental health, drug use and alcohol dependency. Areas around this residence were often subject to a number of complaints and violent crime.

Birmingham City Council had been concerned that the support provided was insufficient for residents’ needs, but technically met the ‘more than minimal’ criteria. Local residents played a key role in identifying the problems and providing evidence to the local authority. Multiple attempts had been made to engage with this provider before formal enforcement was pursued.

Birmingham City Council took the following enforcement actions:

- Planning team issued a notice in June telling the provider that they could not use the property for a supported exempt accommodation supported exempt accommodation purpose;
- Police acquired a closure order from the court for six weeks on the grounds of crime and anti-social behaviour. The council would have liked to take them to court over significant hazards but did not have the staff resource to see through that process.

The below were the results of the formal action taken:

- Residents of the area were appreciative and grateful for the temporary closure;
- The provider is now not able to use building for same purpose;
- Residents were moved on to other properties, with movements to new residencies not tracked;
- The RSH have reviewed the provider and concluded that they are non-compliant with the governance elements of the Governance and Financial Viability Standard. The provider is working with the regulator to address the issues identified by the regulator.

Birmingham City Council expects the wider or longer-term positive impacts to be limited, due to the limitations in regulation that prevent the provider from being shut down or banned from setting up again. To close the whole provider down has negative implications for residents, particularly those who would be otherwise homeless.

Birmingham have continued to recommend engagement first but stands by enforcement decisions made in this case.

## 6.2 Improving the quality and standards of supported housing

Despite the lack of formal action, **local authorities broadly agreed that the pilots will have a positive impact on quality and standards.** This is primarily as a result of further identification and resolution of hazards via informal actions from an increase in property inspections.

According to the monitoring data, local authorities identified 3000 (hazards (category 1 and 2 hazards). Local authorities believed that the majority of these hazards would not have been identified without the funding of the pilots.

A total of 1,675 Category 1 hazards were identified during the pilots. Category 1 hazards pose a serious and immediate risk to a person's health and safety. Examples identified by local authorities during the pilots included significant fire hazards and falls from height. The number of identified hazards varied across local authorities; Birmingham have identified 1,532 of the 1,675 Category 1 hazards and Blackpool, Blackburn and Bristol have identified few or none. Of these Category 1 hazards identified, 899 were removed - Birmingham have removed 801, Hull have removed 81 and Blackpool have removed all 5 they identified. Bristol did not expect to identify a large number of hazards as they have previously undertaken work to improve the quality of accommodation in their area and ultimately removed 2 from RSLs (which typically self-inspect); Blackburn have reported that more work needs to be undertaken to change policies to strengthen the framework to identify hazards, which is likely to result in more being identified.

Furthermore, a total of 1,325 Category 2 hazards were identified throughout the pilots. With the exception of Birmingham, all other local authorities identified more Category 2 than Category 1 hazards. Some local authorities identified fewer hazards generally as quality of accommodation was already of a high standard. Of these 1,325 hazards identified, 560 were removed within the pilot timelines, with Birmingham removing 313, Hull 234, Bristol 7 and Blackpool 6. Similarly to the Category 1 hazards, Blackburn have not removed any hazards.

Pilot funding also enabled innovative practices and joined-up working which improved resident safety. For example, Hull's 'Love Your Streets' initiative used educational visits about waste management to also flag any housing quality concerns to the council's Supported Accommodation Review Team. This enabled them to pick up on problems which may not have been identified in the absence of an inspection, and some referrals resulted in a full property inspection. Blackpool's relationship with Lancashire Fire and Rescue Service as part of the pilot has meant that hazards are identified quickly (which may not have been identified by a council employee who is not a specialist in fire hazards), thus ensuring that residents are safe in their accommodation.

*"I think it's made people much safer...We've picked up [fire safety] issues in every single building - every resident we've seen is safer now."*

- External pilot partner

Some local authorities received a reduction in the number of resident complaints (from any source, including residents themselves and via third parties) about accommodation over the course of the pilots. They attributed this to the fact that residents now had face-to-face contact with officers who were able to deal with concerns before a complaint is submitted. According to the monitoring data, 148 resident complaints relating to poor accommodation were received across the local authorities, as shown in the figure below.

*Figure 14: Graphic showing number of resident complaints (from residents and third-party organisations) received in regard to accommodation*



Other local authorities reported an increase in the number of resident complaints received, which they attributed to increased opportunities for residents to complain as engagement increased, or rising expectations among residents regarding their rights in terms of the quality of their accommodation (such as in the case of Birmingham following the establishment of the Charter of Rights). Engagement activity was considered necessary to encourage residents to provide honest feedback on their accommodation given that residents have historically been reluctant to complain due to fear of eviction.

Local authorities also reported that the extent to which improvements can be made is highly dependent on the relationships that they have with providers. Some criticised the Housing Health & Safety Rating System (HHSRS) for failing to provide clear, enforceable standards: a point recognised by the government’s recent scoping review<sup>8</sup>. Where property standards are poor, but within the standards set out under regulations, local authorities have been dependent on their ability to persuade landlords through informal engagement. Often, providers with the lowest quality property standards are the ones with which they have the poorest relationships or engagement. Local authorities therefore have found it harder to gather accurate information about the quality of accommodation being provided, and have been less likely to achieve an improvement in quality resulting from informal action.

*“A lot of providers are really willing and happy to work with us to improve property standards, but this isn’t true for all of them...”*

- Local authority staff, pilot team member

### 6.3 Improving the quality of accommodation standards – summary of quantitative data

Figure 15: Summary of quantitative data round improving the quality of accommodation standards

	Birmingham	Blackburn*	Blackpool	Bristol	Hull
Number of formal and informal actions taken to improve accommodation conditions	386	0	18	22	229
Category 1 hazards Identified	1532	0	5	5	133
Category 1 hazards Removed	801	0	5	2	81
Category 2 hazards Identified	874	0	41	18	392
Category 2 hazards Removed	313	0	6	7	234
Number of resident complaints received in regard to accommodation	61	0	1	0	86

\* Blackburn focused more on other pilot activities, hence their figures are 0

<sup>8</sup> <https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-outcomes-of-the-scoping-review>

# 7. Resident support reviews and improving the quality of support

*This chapter focuses on the intended early outcomes and impacts of the pilot related to the quality of support provided (as set out in the pilot Theory of Change), which are:*

- *Improving the quality and standards of support;*
- *Ensuring that support provided is tailored and sufficient;*
- *Improving resident outcomes.*

*Key findings:*

*Local authorities reported that the pilots have had a positive impact on the quality, standard and appropriateness of support, which has in turn led to the improvement of resident outcomes. However, impacts in this area are highly dependent on relationships with the provider in question, resident engagement with the support provided, the partnerships instituted and the complexity of support needs. Weaknesses in regulation also make it difficult to challenge poor standards formally.*

## 7.1 Improving the quality and standards of support in supported housing

Local authorities reported that the pilots **have resulted in an improvement in the quality of support received by residents**. This can be linked to authorities assigning greater resources to respond to safeguarding concerns, multi-disciplinary teams improving internal understanding of effective safeguarding responses, or greater communication between internal and external partners resulting in signposting residents to additional sources of local support.

Local authorities said that having an increased workforce (enabled by pilot funds), being able to conduct more in-depth inspections and reviews, and establishing relationships internally and externally have all helped to build a holistic view of the kind of support that a person needs, and how support might be tailored to meet that need. Blackburn reported that increased capacity meant they were able to check on residents more frequently over time (instead of checking once and hoping that the provider improved support), and could conduct follow-ups to verify that their advice or recommendations had been listened to, which also included broader questions concerning individual health and welfare.

*"So the support reviews aren't just about 'oh you're getting the support that was claimed in the Housing Benefit claim all those months ago,' it gives us that holistic view of vulnerable persons in need of wider support".*

*- Local authority staff, pilot team member*

*"One of the things that has been really good is a rolling programme of inspections and reviews so that once someone is in there, we don't just leave it. We will go back and revisit at specific times to make sure that support is ongoing, and that it's effective support."*

-Local authority staff, Housing Benefit team

Blackburn also highlighted that creating an avenue for residents to communicate with them and complain (via an HMO officer) ensured that people living in HMOs were engaged through general activities which could in turn help to prevent anti-social behaviour in the community. This has led to an increased recognition of the role that good support can play in helping residents integrate into the community, and a greater sense of trust between residents and the council.

*"We found out via the role created for the pilot that activities that are available within schemes that prevent boredom are really important to preventing [Anti-social behaviour] He's built up relationships with tenants, providers and activity suppliers (including training and activities) that we just didn't do or know about before the pilot."*

- Local authority staff, Housing Benefit team

*"I think we've made some really positive outcomes for some residents, and we've made more of a communication path between us all now that just wasn't there before to get advice and raise issues."*

- Local authority staff, Housing Benefit team

While not up and running yet, Hull are hopeful that their 'Scores on the Doors' initiative (which will track support given from a provider over time, accommodation standards and the quality of management), will hold providers accountable for the level of service they provide, and lead to better quality support for residents in the long-term.

*"You would hope that from a point of view of quality of life, it will improve their [the resident's] quality of life."*

- Local authority staff, pilot team

In Bristol, a provider has taken positive actions as a result of engaging with the council's pilot, such as keeping a better record of interactions with residents to make sure that all support is appropriate and building on previous activities heeding a recommendation to update noticeboards in the accommodation with signposts to relevant support and (they are already a high-performing provider in terms of support given).

*"I think it [Bristol's pilot] impressed upon us the importance and the need to record what we're doing, and we've got better at that since."*

- Housing provider

Care and support assessments funded through the pilot allowed local authorities to signpost supported housing residents to additional sources of support from services or organisations with whom they are partnering. Blackburn, for example, worked closely to refer residents, where appropriate, to Shelter, the homelessness charity, and Transforming Lives, a local multi-agency initiative which aims to coordinate the response to people with multiple and complex needs. This was reported to have helped to improve the amount and quality of support on offer to residents.

*"We've been working closely with Shelter and Transforming Lives to refer tenants to extra support services when we conduct the reviews, including for things like debt advice... this has definitely made a difference to some of the tenants."*

- Local authority staff, Housing Benefit team

This picture is reflected in the data provided by local authorities on the number of resident complaints received with regards to support, and the number of actions taken with providers to improve support provided to residents. Throughout the pilots, 220 resident complaints were received about support provided. The reviews resulted in over 452 actions taken with providers to improve the support, which included revisits to assess improvements, engagement with providers, and organisational reviews. Bristol reported no resident complaints, which was attributed by the local authority to high standards in the non-commissioned sector.

Figure 16: Graphic showing number of resident complaints received (from residents and third-party organisations) in regard to support

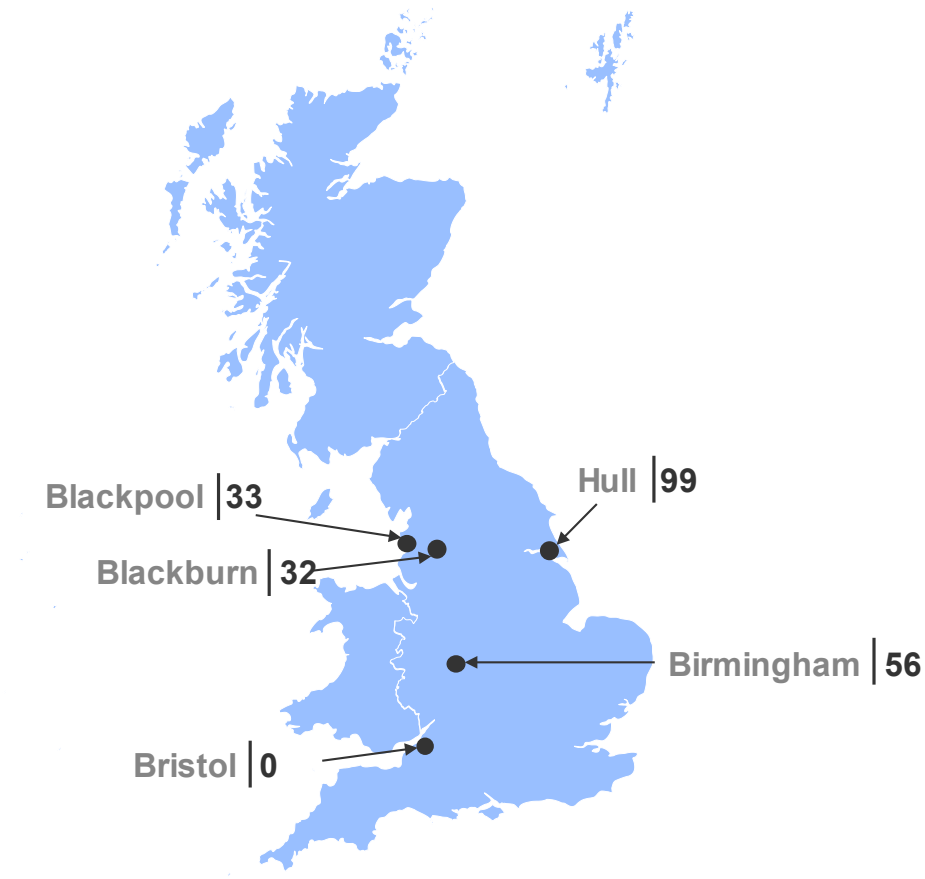
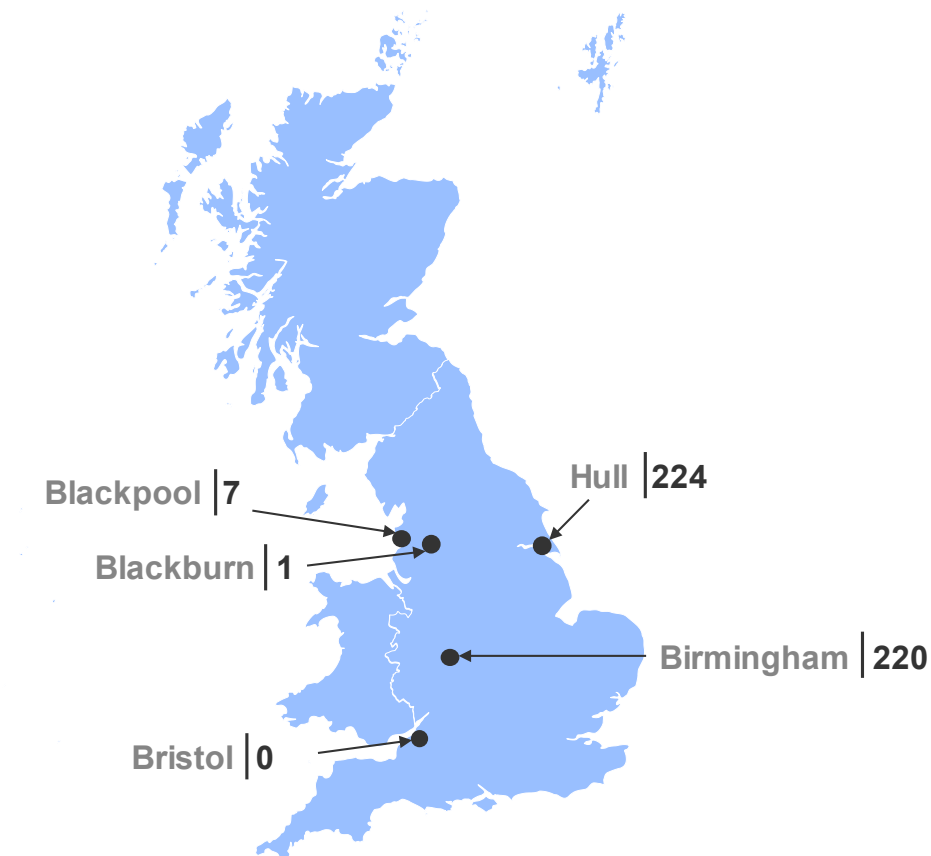


Figure 17: Graphic showing number of actions taken against providers requiring improvements in resident support





Some local authorities found it difficult to provide a true estimate of the extent to which the pilots had influenced the number of complaints received. Some local authorities discussed too, how their resident engagement activities had likely encouraged residents to provide more feedback about the support received, which was often captured in the support reviews. Bristol believed that the pilot had little influence on the number of complaints or safeguarding concerns received as they had previously undertaken work to improve the quality of support within their area. Local authorities discussed how they had been able to create systems to measure this data and are hopeful that in the future they will be able ascertain any change.

Local authorities also reported that their ability to formally challenge pre-existing poor support standards is very difficult given regulatory gaps and subjectivity (particularly with regards to what constitutes 'more than minimal' support – see Section 8.1). In response, local authorities emphasised the need to make sure that referrals into supported housing are appropriate in the first place. This was facilitated by gateway approach activities with the aim of preventing poor providers from entering the market, plans to recommission services (or relying more on 'housing first' models), establishing innovative activities designed to manage and encourage engagement with 'providers of concern', and putting in place better referral processes.

### **Case Study – Implementing innovative activities - Scores on the Doors (Hull)**

Hull City Council's 'Scores on the Doors' initiative, similar in principle to the Food Standard Agency's food hygiene rating, is a comprehensive rating system for supported housing providers in Hull. It is seeking to streamline how supported housing providers are assessed through the use of a comprehensive range of checks on: the quality of the support being delivered, the overall governance of the organisation, and the standard of the property.

The development of 'Scores on the Doors' stemmed from several difficulties with existing supported housing review mechanisms and regulation in the sector:

- Existing council mechanisms often focused on the resident *or* the property, and did not look at the relationship between the two. A lack of regulatory guidance meant that a mechanism needed to be developed to measure the quality of support;
- Visiting a property on one day gave a snapshot of the quality of provision in time, but did not necessarily reflect how well or poorly a provider is acting over a longer period of time;
- How well a provider was performing was based on the subjective view of the visiting inspector, and there was no joined up, objective approach of rating providers across the board.

The system will look at three categories: support, how the organisation is governed and managed, and the quality of the property, thus giving a holistic view of how a provider is doing.

Various activities which indicate any sort of action by the provider will be logged into an excel-based support tracker; for example, this could include reviewing progress with a resident, making renovations to accommodation, or a council inspection. From reviewing the support notes sent to them, Hull City Council staff will be able to log the quality of support that a resident is receiving over time by giving the interactions between support worker and resident a score from 1 – 8. For example: an interaction that simply involves knocking on the resident's door and saying "Are you okay?" and leaving again will receive a low mark, whereas if the support worker is providing high quality support visits such as conducting support reviews with the resident or making referrals to specialist agencies this will score highly. There will also be a traffic light system which ensures that frequent but low-quality visits do not score equally (or better than)

less frequent but better quality resident support. These scores are plotted on a graph over time, with an average line in the middle representing a 'more than minimal' level of provision.

*"Every time we interact with a person or an organisation or a property, we will be able to rate the quality of what we're seeing. Over time, a picture will emerge of the average quality of that provider."*

- Local authority staff, pilot team member

*"Just knocking on the door and saying 'Hi are you alright' every other week, that's going to score pretty low if that's all you're doing. But if you're sitting down and asking somebody what they're good at, what they struggle with, what they need help with and then working out a plan to support them over the next month and then actually following up on those actions then you're going to be scoring in the excellent category."*

- Local authority staff, pilot team member

Both Hull City Council and providers will be able to log activity onto the system (though Providers won't be able to rate their own support or log support visits).

While the 'Scores on the Doors' tracker is still a work in progress, the pilot funding has enabled Hull to employ a software company to develop the system into an online tool that incorporates existing council database that they can draw data from, and create a dashboard that visualises data into easy-to-read charts.

It is envisaged that 'Scores on the Doors' will have several beneficial impacts:

- A solid evidence base for challenging providers that are performing poorly and incentivising them to improve standards and thus improve residents' quality of life.

*"You can look over a two-month period where the support is hitting. Is it bumbling down the bottom not even being adequate, or is it half the time really good and half the time ok?"*

- Local authority staff, pilot team member

*"It will provide the local authority with an evidence base that is sound; hopefully one that providers can't argue with."*

- Local authority staff, pilot team member

*"You would hope that from a point of view of quality of life, it will improve [the resident's] quality of life."*

- Local authority staff, pilot team member

- Fast sharing of information between both different council teams and providers, therefore making the scrutiny process more transparent and more efficient, with decisions on recommendations, punitive action etc. happening much quicker.

*"[Scores on the Doors] helps us to make decisions about what to recommend and how to advise providers."*

- Local authority staff, pilot team member

*"It will make us more efficient, it will be easier for providers to engage with us, and it will allow much easier sharing of information."*

- Local authority staff, pilot team member

The process for "Scores on the Doors" will be fully transparent and the scoring criteria will be shared with providers so that they can understand where they are performing well and where there may be room for improvement.

*"It doesn't only require compliance with regulation, it also encourages best practice."*

- Local authority staff, pilot team member

## 7.2 Improving resident support outcomes

Improvement in the provision of support was considered to **have had a positive impact on resident outcomes** and has been facilitated by the incorporation of resident voices throughout the process of assessing the level of support. However, local authorities also reported that **improvements in this regard are likely to be long term**, and so further improvements may be seen beyond the immediate post-pilot period.

The direct collaboration with residents and incorporation of resident voice is also expected to have a positive impact on the quality of accommodation and support received, as well as resident outcomes. Birmingham's Charter of Rights, for example, was designed with the input of past and present supported housing residents, and the Charter's principles were shaped by their experiences and opinions on best practice that providers should follow. Through the promotion of the Charter, Birmingham City Council believes that its citizens are now more empowered by understanding that support and quality of housing they should be receiving. It can also be said that the resident voice has been amplified through the enhancement of reviews and inspections due to the pilot. These uncovered many relevant findings that have been or can be built upon, whether that be anecdotal evidence of what support residents are receiving, learning from current and past residents about their experiences of supported housing, or understanding as a cohort what standards providers should be held to. Resident co-production was particularly important in Blackburn, Blackpool and Birmingham, with residents involved in the creation of services to support them, enabling the local authority to learn as much as possible from their current and past experiences.

*"Being able to talk to people, talk to tenants directly and not via the provider, you get a really good understanding... and once you can get a hold of these people, they're very willing to talk to you and explain their history, why they're there, what support they're getting, and you can get some really good feedback from people."*

- Local authority staff, Housing Benefit team

Pilots also encouraged changes in provider practices to ensure that residents are receiving the correct support. For example, an outcome of Birmingham's Charter of Rights is that providers are now more willing to work alongside Birmingham's Adult Social Care team to improve the quality of their service delivery and achieve the standards that the Charter lays out. Blackpool reported that providers are now more open to making sure that residents have a positive experience and are willing to adapt to support their needs. For example, one provider has allowed a resident to keep a cat in recognition of the impact this has on their wellbeing, which has been appreciated by the resident.

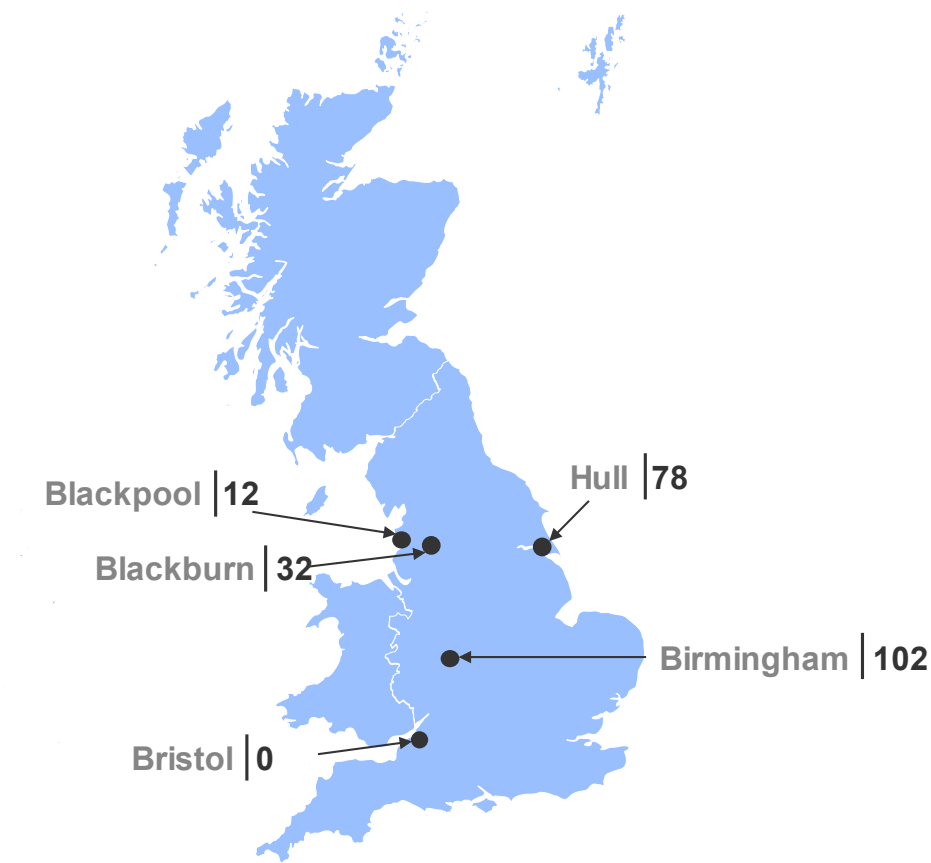
*"Support reviews are essential to understand what is going on in the property... the best approach is to try and engage with the provider and to keep reminding them and working with them to improve, because there's not much we can do legislation-wise on the properties as a whole"*

- Local authority staff, Housing Benefit team

Local authorities also learned throughout the course of the pilots to better identify when people are no longer benefitting from being in supported accommodation. For example, Blackpool found that people who stay in supported accommodation for more than 12 months become institutionalised and lose the drive to be able to live independently. The council is now working with providers to make sure that placements do not last too long (ideally not longer than 3-6 months).

This picture is reflected in the data provided by local authorities; some reported that they saw a reduction in the number of safeguarding concerns received, due to residents having fewer concerns as support offered by providers has improved through the pilots. However, other local authorities identified more concerns than before, attributing this to greater engagement with, and feedback from residents. Bristol reported no safeguarding concerns, and attributed this to a high standard of care in the local authorities non-commissioned sector.

Figure 18: Graphic showing number of safeguarding concerns for individuals received



### Case Study – Improvement to support outcomes (Hull)

In Hull, the pilot team recorded an improvement to one resident's outcomes – Helen\*.

Helen had been subjected to domestic abuse over a long period of time and was known to various organisations including public health and the police. Helen and the perpetrator of violence both had needs relating to substance misuse, which had affected their engagement with the support services. Helen had not been seen by the provider for 8 months.

Care and support reviews conducted revealed that the provider of supported housing to Helen was unable to give concrete answers as to the support provided to her over the time they had been absent. As a result, efforts were made to find more information and measure precisely how much support Helen had received in the last 8 months.

*“We asked for notes, and recorded exactly where, when, what was said, who did what, who the support worker was. I simplified it into the days of the month and devised an 8-point scale where not seeing someone was 0, mid-range was making contact and something had taken place, 8 was escalation into other services and interactions with other agencies. Once all of that was done, we got a really clear picture of what happened to this person...they were really not supported over an 8-month period of time.”*

- Local authority staff, pilot team member

This exercise revealed that the individual had essentially been receiving no support in this time, even where support provision had been recorded in writing. For example, there was an occasion where a support service staff member had knocked on this individual's door, this individual had not answered, but it was recorded to make out that support had been provided when it hadn't.

The provider was given 'make every adult matter or 'MEAM' training to instil best practices and asked for regular support updates. As a result, the staff assigned to this individual was changed

which enabled the individual to access domestic abuse services, food banks, benefits and therapists. The perpetrator was also moved away. Helen's outcomes were significantly improved as a result.

Hull City Council was pleased with the outcome of this activity and saw the benefit of scrutinising provider support activities (or lack thereof) to have good grounds on which to challenge them, obligate them to improve support and thereby improve resident outcomes. This led to the creation and development of the 'Scores on the Doors' tracker, mentioned above, with the aim of consistently tracking provider actions over time.

\*Name has been changed to protect anonymity of the resident

### **Case Study – Impact of resident voice - Charter or Rights (Birmingham)<sup>9</sup>**

Previous research<sup>10</sup> on supported housing in Birmingham, and engagement with residents, identified a number of problems regarding provision in the city:

- There was a lack of agreed standards that providers should work to and no oversight of what level of service providers were giving day-to-day;
- Linked to the above, there was a lack of transparency and understanding of what level of service providers were giving;
- Residents felt that they had no choice or control over what sort of accommodation they were put in nor the type of level of support they would like to receive;
- Residents often felt isolated and unsafe in their accommodation, and their privacy was often violated. This led to poor mental health and wellbeing;
- Residents did not know what their rights were regarding the level of support they should be receiving.

In response to this, Birmingham's Charter of Rights was produced before the pilot, and has been rolled out as part of Birmingham's pilot, alongside a related but separate Quality Standards Accreditation scheme. This Charter outlines guidance for providers about good practice based on the experience of supported housing residents. Initiated and developed by Spring Housing (a provider within the city), it aims to link management practice to positive resident experience.

*"It's about improving the standards around the provision of vulnerable adults [in supported housing] and also the lobbying in respect of some better regulations around supported accommodation because there aren't any"*

- Local authority staff, housing inspections team

It stipulates that residents have a right to:

- Decent living conditions;
- Feel safe and protected;
- Security of property;
- Clear information on support entitlement;
- Seek advice and assistance, and be able to challenge poor standards.

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<sup>9</sup> Spring Housing, 2020. *Charter of Rights for Residents of Supported 'Exempt' Accommodation: Guidance for Providers and Landlords.* <https://springhousing.org.uk/wp-content/uploads/2020/12/Charter-Of-Rights-Provider-Guidance.pdf>

<sup>10</sup> Spring Housing, 2019. *Exempt from Responsibility? Ending Social Injustice in Exempt Accommodation – Research and Feasibility Report for Commonweal Housing.* <https://springhousing.org.uk/wp-content/uploads/2019/11/Spring-Housing-Final-Report-A4.pdf>

The Charter of Rights was developed by working with 50 people who live or have lived in supported housing to make sure it encompassed what they thought was important. Ideas were gathered by holding workshops with residents and former residents where general experiences were shared, what they found good and bad about their experience, and what could be improved in terms of best practice going forward. Two drop-in sessions were also run with stakeholders after the workshops so that anyone interested in improving supported housing had a chance to give feedback on initial Charter ideas.

*“Tenant-participants were consulted at every step of the process, to ensure the final product was meaningful, useful, and accessible.”*

- External pilot partner

Two consultants who specialise in community and participatory approaches were employed to engage with residents, and make sure that all voices were heard throughout the process.

Charter contents have been disseminated through:

- ‘Introduction to the Charter of Rights’ sessions for adoptees;
- ‘Good practice’ workshops and engagement with managing agents and registered providers;
- Presenting the Charter to Birmingham’s Homeless Forum and the Housing and Communities Research Group;
- Producing a guide to the Charter for landlords and providers to help them to understand how to use the document to enhance what they are already doing.

*“It aims to help organisations consolidate, clarify, and build upon their existing practices. This will ensure that they are able to respond to their residents safely, effectively, and consistently, and identify clear linkages between management practices and resident experience.”*

- External pilot partner

The Charter has now had 40 adopters (i.e., providers who have pledged to abide by the Charter), equating to 6,000-7,000 units of accommodation; this figure includes large providers and ones that have been hard to engage with in the past. Birmingham City Council report that the Charter has sent a positive message to providers and that in the main they are very receptive to implementing the best practice it contains. Birmingham stakeholders report that outcomes that can be seen from providers who have signed up to the Charter include:

- Improved staff engagement with residents;
- Better engagement around disputes;
- Enhanced resident satisfaction.

Now that the Charter is established, Spring Housing would like to hand over ownership of it to Birmingham City Council, however a lack of capacity at the council means that this has not happened yet.

However, local authorities reported limits to the improvements that can be made to resident outcomes, given both residents’ needs and challenges accessing support from health and social care services. Care and support assessments revealed that residents often have complex and intersectional support needs, typically across mental health, homelessness, drug or alcohol misuse and others. There is increasing evidence, from programmes such as ‘Make Every Adult Matter’ and Fulfilling Lives, of the challenges which those with multiple and complex needs face in accessing timely and effective support from overstretched mental health, substance misuse and other services.

In examining referral pathways, for example, resident engagement was a significant determinate factor in their effectiveness on outcomes. In the case of Blackburn's partnership with Shelter, it was reported that broadly one-third of those referred to Shelter's support services engaged and directly benefitted from referral, one-third engaged initially but did not retain engagement, and one-third did not engage.

*"It does depend on whether the residents take up the support offered... Of the 15 we referred, [partner] couldn't get in touch with 5 of them, and another 5 they could get in touch with but they dropped out. The remaining 5 who engaged with the support really benefitted though."*

- Local authority staff, Housing Benefit team

Hull also noted that, as a lot of local authority pilot work is targeted towards providers rather than the residents themselves (e.g. getting providers to make sure paperwork is up to date, and gateway approaches), the positive outcomes for residents from the pilot are indirect and may not be immediately picked up. However, all of this work in the background should ensure that residents are receiving good accommodation and support.

*"From a resident's perspective it's probably a hidden impact that they don't recognise, but hopefully improving the standard of support they're receiving [means] they're getting value for money...there has been more emphasis on the residents' views."*

- Local authority staff, pilot team member

### 7.3 Risks to residents

So far, there has been no anecdotal or recorded evidence of any negative impacts of pilot activities on resident outcomes so far. For example, DLUHC had at the outset been mindful that there might be a risk of increased homelessness and/or rough sleeping if the pilots were to result in the closure of non-commissioned supported housing schemes which are supplying much-needed accommodation, even if they are not providing sufficient quality of support and hence value for money. Local authorities recognised this tension in relation to enforcement, for example:

*"It's a bit of a double-edged sword really, because people have said it's better than being on the streets even if it's a total dog's dinner of a house and there's no support provision."*

- Local authority staff, pilot team member

However, authorities also reported that their needs assessments and strategic planning had enabled them to build a much clearer understanding of what supported housing was needed and where. They felt this mitigated any risks to future supply resulting from gateway approaches.

With enhanced care and support reviews, residents may be wary of divulging too much information to their local authority about what level of care and support their landlord is providing (or not) in case the landlord or provider takes this negatively and evicts them, as mentioned in Section 5.10.5. They may also have low expectations of the quality of support and accommodation they are entitled to.

*"The majority of residents were quite happy with the level of support they [the providers] were providing but that was a lack of expectation and it's down to, they get nothing normally."*

- Local authority staff, pilot team member

The potential risks to residents from increased enforcement through Housing Benefit decisions are discussed in more detail in section 5.10.5 – one concern expressed was that more residents may be subjected to legal processes that may put them under significant stress and pressure. So far, there has been no evidence of this happening as part of the pilots; in fact, local authorities were hopeful that, by using evidence drawn from residents'

care and support interviews, they could reduce the need for them to appear in front of the tribunal.



## 8. Enhanced Housing Benefit scrutiny and improving value for money

*This chapter focuses on the intended early outcomes and impacts of the pilot related to Housing Benefit scrutiny and improving value for money (as set out in the pilot Theory of Change), which are:*

- *Making accommodation costs more reasonable*
- *Improving value for money in supported housing*

*Key findings:*

- *In the long term, the pilots may improve value for money of supported housing, but ascertaining whether this will be the case in the immediate post-pilot period is challenging. This is because improvement in value for money is unlikely to arise directly from cost-reduction, but instead depends largely on the extent to which gateway and scrutiny activities going forwards are able to prevent and challenge poor provision, and the extent to which quality and standards in accommodation and support improve in the long term.*
- *By their own calculations, local authorities have stated £6.2 million that has been prevented from being paid in error, but this is only a small part of the picture.*

### 8.1 Making accommodation costs more reasonable

Housing Benefit scrutiny aims to ensure that specified accommodation claims are legitimate and that the amount of rent and service charge being charged is reasonable. For local authorities, 'reasonable' costs were those that were appropriate to the standard of support and accommodation.

Over the course of the pilots, local authorities have improved the process of Housing Benefit scrutiny, increasing the number of reviews carried out, some of which led to reassessments or supersessions on the grounds that the criteria for specified accommodation were not met. As discussed further in the following section (9), the additional resources of the pilot enabled most local authorities to strengthen their gateway approaches, which all felt was critical to ensuring that providers who proposed unreasonably high costs did not establish new schemes in their areas, or reduced their costs.

**This indicates that the pilots may help ensure accommodation costs are more reasonable in the long-term, but this has been challenging to measure robustly in the immediate post-pilot period.**

The first part of this section considers the impact of enhanced scrutiny on identifying and rejecting illegitimate claims for specified accommodation (S.8.1.1) and, within that, for specified *exempt* accommodation (S.8.1.2). Sections 8.1.3 and 8.2.4 consider the impact of enhanced scrutiny of the *amount* of Housing Benefit being claimed, in relation both to service charge and rent.

### 8.1.1 Rejecting illegitimate claims for specified accommodation.

For housing costs in supported housing to be paid through Housing Benefit the criteria set out in the Housing Benefit Regulations<sup>11</sup> must be met, i.e.:

- The housing provider is not-for-profit (Registered Provider, charity, social enterprise or local authority);
- The claimant has been admitted in order to meet a need for care, support or supervision; and
- The claimant receives care, support or supervision;
- Also, for a specified exempt claim, the housing provider, or a person acting on their behalf, provides the claimant with care, support or supervision.

If a claim is disallowed on one or more of these grounds, it is likely that accommodation costs would be reduced. In the case of a working age applicant, this would mean that accommodation costs would instead be covered by Universal Credit, limited either to reasonable social rent or by the Local Housing Allowance subject to the benefit cap and/or removal of the spare room subsidy as appropriate. However, cost savings cannot be guaranteed in this scenario: the claimant may appeal the decision, or end up - through eviction, rent arrears or choice – moving elsewhere.

Pilot funding provided additional resources to carry out investigations into organisational and group structures, and to better understand the respective roles of and relationships between landlords, providers and commissioners<sup>12</sup>. Local authorities have been able to take informed action as a result where the evidence collected shows that the criterion for specified or specified exempt accommodation have not been met. For example, Blackburn have had the resources to inspect properties when a rent increase was submitted, resulting in a large charity provider being reassessed as not specified. Conversations with the Regulator of Social Housing also resulted in Blackburn referring two Registered Providers about which they had concerns. One provider was downgraded as a result, and the other was still being reviewed at the time of the interview<sup>13</sup>.

Nevertheless, local authorities were acutely aware that even significant gains like this may prove to be short-lived, given the capacity of well-resourced, profit-motivated providers to evolve new structures or partnerships within the current legal framework. For example, Blackpool explained that one property in their area had been exchanged between a number of different organisations, with the sale price increasing each time; it was their view that there was too much at stake for the provider to simply walk away at this stage. Local authorities were aware of the increasing involvement of Real Estate Investment Trusts in the short-term, as well as the longer-term supported housing sector, and reported challenges unpicking complex lease agreements which inflated rental costs because they include lease charges designed to generate profits for investors.

Local authorities were able to gather more evidence through increased and/or enhanced care and support reviews during the pilots (as described in Section 7); however, they were cautious about the pilot's impact on successfully rejecting specified claims on the basis of insufficient support provision. The additional evidence they collected, e.g. through the multi-disciplinary teams, made local authorities feel more confident to take action (see S5.10.5 for more discussion of this); and there were instances in which landlords, when informally challenged with this evidence, willingly

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<sup>11</sup> S3A, The Housing Benefit and Universal Credit (Supported Accommodation) (Amendment) Regulations 2014

<sup>12</sup> For example, understanding which schemes are commissioned and how much care and support is going into these schemes had enabled HB teams to challenge costs for 'Intensive Housing Management' from the landlord.

<sup>13</sup> Where Registered Provider status is removed, the local authority can then reject specified accommodation claims on the grounds that the provider is not a legitimate, 'not-for-profit' provider.

agreed they were not providing supported housing and the residents instead claimed Universal Credit for their housing costs.

However, where cordial negotiations had not been possible, local authorities expressed concerns that their decisions might yet be appealed and overturned at tribunal at a later stage, given the lack of clarity regarding 'more than minimal' support in case law, and the expertise and resources available to providers from specialist consultants operating in the sector.

### **Case Study – Approaches to establishing and interpreting 'more than minimal'**

Local authorities assess whether or not the care, support or supervision being provided to an individual is 'more than minimal.' This is a key part of their decision about whether or not the individual's claim meets the requirements of specified accommodation and should be paid under Housing Benefit or (for a person of working age) under Universal Credit.

In practice, Housing Benefit officers typically assess whether 'more than minimal' care, support, and supervision is being provided when scrutinising new benefit claims, and particularly where individuals are living in newly established, non-commissioned provision, or when reviewing existing claims, for example in response to concerns or complaints.

Across pilot local authorities, there have been several different approaches to defining standards within the provision of care, support and supervision and generating evidence to inform Housing Benefit decision-making in relation to individual claims.

#### **Birmingham**

Spring Housing in Birmingham have created and promoted a resident-led 'Charter of Rights' which outlines, among other things, that residents should feel safe and protected, and should have knowledge of the level of support they're entitled to. Whilst not directly informing individual Housing Benefit assessments, the local authority felt that the development of the charter had created a benchmark and a set of standards against which the care, support and supervision a claimant receives can be measured. While stakeholders are clear that they think it is good that these guidelines have been laid out, the fact that they were developed by one supported housing provider from Birmingham (albeit then endorsed by the Council) could cause a conflict of interest.

#### **Hull**

Hull's Supported Accommodation Review Team gather information during support reviews. These ask about the person's circumstances and needs and what support they want the landlord to offer them (whether it be emotional, physical and/or financial). This information is then checked against the needs assessment carried out by the landlord (which is collected as part of Hull's 'document suite' scrutiny). If they do not align, then the provider is told to improve or is referred to the Housing Benefit team. In this case, 'more than minimal' is defined by what the resident wants and needs and not what the local authority and provider *think* they should provide. Through this method, as part of the pilot, Hull has overturned a number of individual claims for specified accommodation because providers have not been able to prove that they are providing sufficient support. They have also refused one scheme and partially refused another (more on this in the section on managing new supply).

Hull also plan to incorporate 'more than minimal' into their 'Scores on the Doors' system, in the form of a line on a tracking graph to compare to the support provided for a single individual

against poor, minimal or good support. Where this 'more than minimal' line sits has been designed to reflect existing case law and draft Housing Benefit guidance.

## **Blackburn**

Blackburn have also taken a resident-centric approach to establishing 'more than minimal' and have been focusing on using resident interviews to establish exactly what support is being provided to them, instead of looking at provider paperwork which may exaggerate the support given. Stakeholders have fed back that taking a resident-centric view to inspections and scrutiny has been useful.

*"More than minimal is a very sticky concept that local authorities don't like because it's not clear enough. It's very easy for a provider to make it look like they are doing more than minimal, this is why getting honest answers from resident interviews is so important."*

- Local authority staff, Housing Benefit team

*"For us it's about looking at support more, working out which providers we need to work with more, and reviewing Housing Benefit to ensure it's justified rather than inflated."*

- Local authority staff, Housing Benefit team

Despite the above efforts to establish 'more than minimal', all local authorities expressed various frustrations around trying to define and impose it:

The pilots are acutely aware that where they decide a provider is offering 'less than minimal' support and reject a Housing Benefit claim on these grounds, the provider may well appeal this decision. In the absence of a clearer definition of 'more than minimal' in case law, local authorities reported varying interpretations by judges at tribunal. Moreover, local authorities reported that it is much easier for a provider to supply information to demonstrate that they are delivering 'more than minimal' support than it is for the authority to prove they are not, especially where residents are brought in – and potentially coerced – to testify.

*"Care and support is defined as, as long as it's above a minimal standard, but then that minimal standard isn't really defined in Housing Benefit legislation, which is one of the big problems we have."*

- Local authority staff, pilot team member

Stakeholders mentioned that it is fairly straightforward for local authorities to control what is 'more than minimal' in their own commissioned supported housing, as they fund the support, regulate its quality and control referrals into it. However, with non-commissioned specified accommodation, they have no control over the quality of provision and may not even know a scheme has been established prior to a Housing Benefit claim coming in. With no regulation of support provision outside of commissioned contracts, local authorities have very little power to obligate an improvement in support, aside from their Housing Benefit decision-making which, given the limitations highlighted above, is a rather blunt instrument.

*"The fact that there's no regulation around this type of housing, care homes have lots of regulation, but there's a whole group outside of that with no regulation or review, meaning that providers can just do what they like."*

- Local authority staff, Housing Benefit team

The process of trying to assess whether or not 'more than minimal' care, support or supervision is being provided is often frustrated by residents having low expectations of support providers and being reluctant to speak out against them for fear of being made homeless. COVID-19, at least at the beginning of the pilot, made assessing 'more than minimal' even more difficult as

local authorities have not been able to do in-person inspections and had to rely on paperwork or phone conversations.

As Housing Benefit claims are made by individual residents, the question of whether or not 'more than minimal' support is being provided, and whether or not the resident *needs* the support, has to be reviewed at an individual level rather than at a scheme level. This means that a scheme may contain a mix of residents who need and are receiving 'more than minimal' support and those who are not. This makes it extremely resource-intensive and complex for a local authority to take action at a whole provider/scheme level on these grounds as they would have to contest and evidence each individual claim. This makes the expansions of schemes difficult to regulate.

To tackle these difficulties, there was a consensus amongst local authorities that there needs to be a clear definition of 'care, support or supervision' and the required threshold for a legitimate specified accommodation claim within the Housing Benefit regulations. Local authorities felt this would enable them to challenge claims more confidently for specified accommodation where the standard has not been reached.

*"There should be defined, set quality standards to say this equals this."*

- Local authority staff, pilot team member

### **8.1.2 (Re-)categorising a claim for specified accommodation as 'managed' rather than 'exempt'**

When conducting gateway processes or reviewing an existing claim, a local authority might accept that the criteria for specified accommodation have been met, but not be satisfied that the specified exempt (as opposed to 'managed') category is appropriate. Housing Benefit officers explained that scrutiny sometimes identifies that the support is being separately commissioned from a third-party provider and that there is insufficient evidence to support the landlord's claim that they are providing 'intensive housing management' (i.e., over and above what a landlord would typically provide to a general needs resident), within this arrangement. This is highly significant to the question of accommodation costs since exempt accommodation is exempt from the Removal of the Spare Room Subsidy and the Local Housing Allowance; specified managed accommodation is not. Furthermore, local authorities reported difficulties in successfully challenging 'unreasonably' high rents in 'exempt' accommodation – a point which is discussed in more detail in section 8.1.4.

The improved cross-departmental working seen in most participating authorities during the pilots has led to more systematic intelligence sharing between Housing Benefit teams and commissioners of care and support, based in Adult Social Care and/or homelessness teams. For example, one Housing Benefit officer explained:

*"For the first time I've seen now just how much commissioned support is being provided on a weekly basis, and I have a list of commissioned providers and this has enabled us to seriously question the level or type of support that's being provided by the landlord".*

-Local authority staff, pilot team member

Although Housing Benefit teams were automatically reassured about the amount and appropriateness of support going into commissioned arrangements (and hence that the 'more than minimal' requirement was being met), having access to this intelligence meant they could begin to interrogate intensive housing management claims by landlords in these arrangements. Knowing which claims relate to commissioned schemes, and which individuals are receiving a care package or personal budget from the local authority also enabled Housing Benefit teams to identify *non*-commissioned supported housing schemes where it was possible that the 'more than minimal' criterion was not being met.

### **8.1.3 Identifying ineligible or inaccurate accommodation costs**

Where local authorities are able to identify discrepancies between the costs cited by the provider within their service charge calculations and the services which are actually provided, they can restrict the amount of service charge.

Local authorities were able to give examples of how they had challenged spurious service charges as a result of additional property inspections and partnership intelligence enabled by the pilot; for example, by identifying that a property for which gardening services were included in the service charge did not have a garden. As highlighted in the previous section, they have also been able to undertake more targeted and evidence-based scrutiny of the 'intensive housing management' charges claimed by landlords, given increased understanding of the commissioned support going into managed schemes, and hence whether some activities are effectively being double-funded. Hull reported how more in-depth scrutiny and inter-departmental intelligence sharing has allowed them to identify proposed rent increases which are not permissible, for example because there is no term to allow such an uplift within the lease agreement between the provider and the property owner. Birmingham was also able to carry out more reviews which led to earlier identification of claims being made on units vacated by residents but not yet cancelled, meaning that they could cancel these claims.

Scrutinising providers' cost spreadsheets is not only resource intensive, but also involves a number of challenges which cannot be quickly addressed. For example, local authorities explained that providers sometimes present their costs averaged out across their whole portfolio (which may stretch well beyond the local authority's boundaries). Often further evidence and clarification then needs to be requested from providers, who may take a long time to supply this, whether due to lack of capacity, understanding, differences in accounting systems or wilful resistance. The additional funds made available through the pilot have enabled most local authorities to increase the amount of resource dedicated to this activity; however, the sheer numbers of specified claims in some areas, combined with the forensic analysis required and the time it takes some providers to respond to local authority requests means that the impact to date on accuracy of spend is likely to be fairly limited.

### **8.1.4 Challenging 'unreasonably high' accommodation costs, and annual increases**

Local authorities consider the reasonableness of rents within their gatekeeping gateway approach, or (where that has not been possible) when a claim is received and in subsequent proposed increases, which tend to be received in March/April at the beginning and end of the financial year. Pilot authorities stressed that it is very difficult to tackle high rents within the current legal and regulatory system, and that there are particular challenges with lease-based schemes where there may be several layers of costs and charges, and a high risk that profits are disguised within these. Restricting service charges is more straightforward, especially where a benchmark of similar costs across the local authority has been established.

Local authorities described how the additional resources from the pilot had enabled them to benchmark rents and service charges across different types of provision both locally and with comparator authorities. This evidence had increased their confidence to challenge high-cost providers, for example by arguing that the benchmark rates be used where a new scheme has been set up, until the provider is in a position to prove actual spend. For a local authority to successfully challenge the rents set by a Registered Provider as being 'unreasonably high' they must make a referral to the Rent Officer, who will ask for evidence of the costs and availability of 'suitable alternative accommodation'. Having clear evidence of benchmark costs may strengthen local authority confidence to take action and the likelihood of their success in such cases.

The rules which describe the process by which a local authority can legally restrict a rent which they deem to be ‘unreasonably high’ are complex<sup>14</sup>; and depend on whether or not a property is classified as ‘exempt’<sup>15</sup> (as opposed to the other specified categories) and on whether or not the landlord is a Registered Provider. All claims from people living in non-registered provision should be referred to a rent officer and if the landlord is registered and the local authority believe the rent to be ‘unreasonably high’, they must refer the case to the Rent Officer to make a determination. Local authorities explained that in the case of registered landlords they will always try to negotiate where rents are high, rather than refer to the Rent Officer to enforce a restriction, partly because they consider there is a risk that the outcome will be to their detriment.

*“We steer away from referring to the Rent Officer, because we’ve done it once and the experience was painful. We don’t refer Registered Providers because the point is that the regulator is supposed to be able to control what rents are being set. Once we’ve got that Rent Officer decision in, we are bound to pay that level, and if its exempt and the decision is higher, we lose that in subsidy”.*

- Local authority staff, pilot team member

There is a further layer of complexity in that the level of subsidy which local authorities receive back from DWP for Housing Benefit claims they have paid out varies depending on whether the claimant’s landlord is a Registered Provider (in which case the local authority is fully rebated) or not (in which case they are only partially subsidised). If a case is referred to a rent officer (as explained in the paragraph above) subsidy is restricted to the level of the rent officer determination. In order for a local authority to restrict rent in an ‘exempt’ property, it must be confident it can demonstrate (i.e., to a judge, at appeal) that the rent is ‘unreasonably high’ compared to ‘suitable alternative accommodation’. This explains why local authorities reported that ‘gatekeeping’ claims for specified exempt accommodation is so important, and why some of the gains made by the pilot may assist in this process. The pilots have highlighted the complexities and challenges within this system, but it has clearly not changed the system itself.

*“If it’s exempt accommodation and you are arguing that the rent is unreasonably high and that the claimant should either live in alternative accommodation or that the rent should be restricted - you literally have to have alternative rooms available and they have to be significantly cheaper than the amount you are challenging”.*

- Local authority staff, pilot team member

### **8.1.5 Quantitative evidence of the pilot’s impact on costs**

Overall, of the 3,276 Housing Benefit reassessments undertaken within the pilots, Housing Benefits payments were reduced in 1,991 cases, and 1,285 claims were re-assessed and found not to meet the specified accommodation definition. Local authorities believed they were able to increase the number of reassessments carried out as a result of pilot funding, which resulted in an increase in Housing Benefit claims reduced or reassessed as not specified.

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<sup>14</sup> For a more detailed explanation, see

<https://www.housingsystems.co.uk/Portals/0/Documents/Briefings/2020/Exempt%20Accommodation%20Briefing%20Feb%202020.pdf?ver=2020-02-11-122258-877>

<sup>15</sup> Reg 12, 13 and 13Z which are found in the HB Consequential Provisions Regulations.

Figure 19: Number of Housing Benefit claims reduced or reassessed

Local authority	Number of claims where Housing Benefits payments were reduced	Number of claims reassessed as not specified accommodation due to insufficient support following inspection or support review
Blackpool	0	0
Bristol	0	0
Blackburn	83	2
Hull	1071	49
Birmingham	837	1234
Total	1991	1285

In addition to the number of reassessments undertaken, a number of Housing Benefit claims have been rejected over the course of the pilots: of 32,681 new claims received, 226 of these were rejected. Local authorities pointed out that the pilot funding had allowed them more time to dedicate to investigating providers and the ability to liaise with other teams and authorities to gather information and make accurate and informed decisions. In other cases, rejections were made on the basis that sufficient information had not been shared by the provider in question. For example, through the pilot, Hull were able to visit new or expanding providers and reject claims if they were not satisfied that the necessary support was provided. In Blackpool, there were 40 new Housing Benefit claims rejected, which Blackpool attributed to being able to make more informed decisions on claims as they had better data collection through the pilot. Blackburn have been able to scrutinise every rent increase, which has led to an increase in the number rejected.

Figure 20: Number of new Housing Benefit Claims received - accepted and rejected

(Q12) Number of new Housing Benefit claims assessed during this period	Rejected	Accepted
Blackpool	40	1,225
Bristol*	0	0
Blackburn	4	595
Hull	41	1,608
Birmingham	132	29,077
Total	217	32,505

\* Bristol did not receive any applications relating to new schemes, properties or providers over the course of the pilot

However, local authorities have found it challenging to determine the impact of this activity on the average amount of Housing Benefit awarded for specified accommodation claims. This is because the claims rejected or reduced represent a small proportion of the total number of claims and the churn of claimants within this sector is high. This means that the total amount of Housing Benefit spent by each authority on specified accommodation fluctuates every month for reasons that are beyond the control of the pilots. At a national level the evaluation confirmed that SHBE data returns to DWP cannot accurately distinguish the different categories of Housing Benefit claims. Future data collection that is able to reflect the nuance of different types of claims, which are also contextualised among other factors such as rent increases due to inflation, may help to provide greater accuracy in relation to the average amount claimed.



Local authorities were also asked to estimate money that the pilot prevented being paid in error, with both Blackpool and Birmingham estimating this to be in the region of £2.5 million each. This was thought to be due to:

- Application of gateway approaches to new providers;
- Increased scrutiny of new and existing claims;
- Enhancements to the process of conducting scrutiny;
- Increased benchmarking of provider costs;
- An improved confidence in dealing with new providers and scrutinising rent increase.

Local authorities estimated that pilot activities prevented £6,207,862.73 being paid in error. Some local authorities suggested there have been additional savings from the impact that improved quality of support and accommodation has in terms of reducing the demand for other local services including police, mental health and the criminal justice system, and to the NHS. However, these savings have been challenging to quantify and produce as this data is not collected by LAs, and if it is collected, it is by other bodies and difficult to access or isolate. Additionally, local authorities have all used different approaches to estimate their savings and Kantar Public has not done an assessment of these methods. As a result, the data collected by the evaluation suggests that activities undertaken within the pilot may have had the impact of making accommodation costs more reasonable, but this has been challenging to measure robustly in the immediate post-pilot period.

*“It is difficult to tell if we’ve saved on costs - Rent increases have been robustly challenged in the last year, but understanding outcome of value for money is much more subtle.”*

- Local authority staff, Housing Benefit team

Figure 21: Estimated amounts estimated to have been prevented being paid in error and rationale

Local authority	Estimated amount*	Rationale
Blackpool	£2,516,800	Estimated annual prevented spend through a combination of preventing new schemes and amending costs of existing and new schemes (using the benchmarking data).
Blackburn	£473,365	Estimated annual prevented spend through restricting rent increases (through better scrutiny) and comparable data.
Hull	£717,697.73	Estimated from the yearly reduction in spend for the NHS from removal of Category 1 Hazards in year 1 of the project £17,697.73. Also from 49 claims reassessed as not specified accommodation following inspection or support review additional potential reduction of £700,000.
Birmingham	£2,500,000	Large sums of Housing Benefit overpayments have been identified and recuperated from landlords due to fraudulent claims or landlords not

Bristol	£0	meeting legal responsibility to advise of changes. Bristol did not make any changes to its caseload given the work that pre-dates the pilot
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\*Estimates calculated by individual local authorities. It should be noted these calculations have not been netted off against housing support payments that are made for these individuals in either general needs housing or alternative Supported Housing.

### Case Study – Challenging Housing Benefit Claims - (Blackburn)

Blackburn reported that the resources provided by the pilot have improved the depth and increased the incidence of their Housing Benefit scrutiny, largely via establishing standardised processes for conducting effective scrutiny in collaboration with the necessary teams.

*"The pilot has been a positive, we've enhanced what we know and how we do it, which means we will be able to provide advice and guidance to other local authorities with less resources."*

- Local authority staff, Housing Benefit team

For example, over the course of the pilot Blackburn have instituted templated and standardised questions as a part of the scrutiny process that are sent out to providers at the point of a claim. These were developed in conjunction with other teams involved in the pilot such as Housing Needs and Housing Options. This has improved their ability to make informed decisions on whether or not a claimant's landlord is satisfying the specified definition, the levels of rent/service charges are appropriate, and support provided is 'more than minimal'. Support reviews are now conducted at the point of admission, which are used as a reference point later in the scrutiny process.

*"We now have an established set of templated questions around seven pages long that asks about all the details of the scheme that we need. It asks specific questions about the provider and support provided. We often are able to get them to reduce the rent if they can't or don't provide the evidence we need."*

- Local authority staff, pilot team member

*"Through the pilot we've been able to build links with planning and housing needs which we didn't have before. We better understand paths into supported housing, and we can see that in many cases no needs review was done at all. Now, when we get claims in, we are able to compare with their original needs assessments."*

- Local authority staff, Housing Benefit team

*"One thing that's changed is greater data collection, which will probably continue after the pilots. We've added more questions to better understand the environment and changed questions on the original claim form. Now we need to make sure a support review is done on admission and put in a three-month review to check support is still happening."*

- Local authority staff, Housing Benefit team

*"It is very frustrating to determine what [more than minimal] is. We ask for more information now than we did before and what they are expecting to be received. We look at staffing structure and staff-resident ratio to see if plans are reasonable and make a common-sense decision. We rely a lot on comparing with case law, and it comes down to each individual case."*

- Local authority staff, Housing Benefit team

Furthermore, the council have worked to establish guidance for Housing Benefit assessors conducting background checks to determine whether a claimant's landlord satisfies the specified definition.

*"The best thing that's come out of the pilot is the guidance document which covers what kind of things to watch out for and what to do when scrutinising a claim, for example checking with the charities commission."*

- Local authority staff, Housing Benefit team

The establishment of multi-disciplinary teams for inspections at more regular intervals, and an avenue for information-sharing between teams has provided the council with much more information about their current caseload and providers. For example, if it is discovered at an inspection that the support outlined is not actually present, then the case is flagged for further scrutiny. In some cases, this has dispelled myths about the quality of providers currently operating in the area.

*"This approach means that we now have a much better understanding of our caseload and how we need to engage with providers to ensure we have the information we need to determine an appropriate level of rent and service charges."*

- Local authority staff, pilot team member

However, the council reported that expanding the teams involved in establishing Housing Benefit scrutiny documents and increasing the resource used for conducting scrutiny would have been more impactful.

*"If you want to make more meaningful impacts going forwards it definitely needs more resource. You definitely need the wide range of staff to scrutinise properly and to review processes regularly going forwards."*

- Local authority staff, pilot team member

*"You need resource from skilled benefit assessors who know the group and challenges, plus training for new benefit assessors. Supported housing is almost a specialised area in and of itself, you need to be able to understand rent breakdowns, review Companies House and Companies Accounts. It's a time-consuming exercise, and [needs] people who aren't afraid to challenge."*

- Local authority staff, Housing Benefit team

# 9. Managing new provision and strategic planning

*This chapter explores the desired outcomes and impacts of the pilot with regards to improving the management of supply, deterrence of poor providers, and improving systems of provider management (as set out in the pilot Theory of Change). These are:*

- *Local authorities have been able to better manage supply, based on local need;*
- *Accommodation costs become more reasonable;*
- *Improved value for money in supported housing;*
- *Supported housing teams feel more confident and capable to challenge poor standards;*
- *Standards of providers are improved, and poor providers are deterred.*

*Key findings:*

- *Local authorities have reported that they are now able to better manage supply through gathering information on the supported housing sector and considering other housing models to accommodate people.*
- *Value for money and a reduction in poor standards have been achieved by managing new supply through gateway approaches, to make sure that poor providers are deterred or prevented from entering the market.*

The management of new provision by local authorities as part of the pilots can be split into two general activities. Firstly, there is strategic planning, where local authorities have sought to understand the supported housing market in their area in more depth, and what improvements or other changes (such as size and / or shape) to the market need to be implemented and prioritised. Following this, knowing the sort of accommodation that is needed, several local authorities have been exercising gateway approaches as part of their pilot to manage the amount and type of supported housing providers that are setting up in their local area.

## 9.1 Strategic planning<sup>16</sup>

Local authorities have undertaken needs and supply assessments and strategic planning activities<sup>17</sup> as part of the pilots to better understand the supported housing sector in their areas, and plan to meet future need with appropriate supply. This is with the aim of establishing processes for better managing supply and ensuring good quality going forward.

*“We were keen to try and get a handle on exactly what is happening in the sector.”*  
- Local authority staff, pilot team member

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<sup>16</sup> N.B. Blackpool’s strategic planning work was delayed, so they are not a part of these findings

<sup>17</sup> Only three of the five pilot areas conducted strategic planning activities

Notwithstanding the methodological challenges highlighted in section 5.5, the strategic planning activities have themselves been relatively straightforward, although there have been some difficulties when stakeholders (both internal and external to the local authority) have been slow to pass on data, due to issues with information sharing or capacity. This would have caused concern with the original project timelines, but was mitigated somewhat after the pilots were extended. Attempting to collate data from a number of different datasets has highlighted a number of structural challenges relating to the way data is collected by and shared between different agencies. These have included DWP or the Probation Service not being able to share individual data without consent; and police, NHS and local authorities collecting on differently defined geographical localities.

All authorities felt that it would be useful to share and further develop best practice between authorities and nationally in relation to needs assessment methodology, especially when looking beyond commissioned provision.

Some interesting insights came from local authorities' strategic planning activities. Most local authorities reported that, for the first time, they were able to understand which types of support are being provided in supported housing schemes in their area. Some local authorities were able to find out what the average charge is for supported housing in their area, which can be used as a benchmark when new providers set up.

Perhaps the most important finding from strategic planning activities is that supported housing interventions are often not being targeted most effectively. For example, some local authorities found that not all of those being referred by Housing Options teams to supported housing had support needs in addition to their housing need; single homeless people tended to be placed in supported accommodation by default, due to a lack of affordable mainstream accommodation and limited opportunity for in-depth and professional assessment of people's support needs. This also resulted in an apparent undersupply of supported housing, and long waiting times for people with additional support needs who really need this type of accommodation with support. One stakeholder pointed out that while a person is waiting for supported housing, their condition may deteriorate, risking a need for more intense support later, with long-term implications for cost.

Compounding the overuse of supported accommodation, analysis also found that the types of supported housing into which people were placed, especially larger facilities, were sometimes inappropriate for their needs and could in fact be detrimental to them, or place others around them at risk. Findings from research conducted by pilot authorities suggest that larger, congregate supported housing provision does not have good outcomes, especially where many residents have multiple and complex needs, past experiences of trauma or a range of other vulnerabilities<sup>18</sup>:

*“Those people make life much more difficult for the people that could tolerate the environment...people go into this hostel without a drug problem, without a drink problem, but they meet this hard core in there and get drawn in.”*

- Local authority staff, pilot team member

On the other hand, smaller facilities are reported to have much better outcomes. This may be because they are able to be more selective around which residents they accept, because support is more specialised and can be better tailored to individual needs; and/or because smaller schemes tend to offer a calmer environment, which is key to the recovery of those with histories of trauma.

Local authorities are planning to carry out various actions arising from the findings of their strategic planning in the future. For example, to reduce demand for supported housing, Hull are planning to increase their focus on homelessness prevention activity. There is a desire in several local authorities to 'triage' people who are referred to supported housing to make sure they are placed in accommodation that is appropriate to their needs and where they will have the best chance of

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<sup>18</sup> This finding has come from Mark Goldup's strategic planning work for Hull City Council

positive outcomes. This may be facilitated, for example, through enhanced care and support assessments at the point of referral. Both Hull and Bristol suggested that there needs to be a significant change in supported housing provision in their areas to focus more on smaller and/or self-contained accommodation where vulnerable individuals are protected from potential harm from other residents. This may be best delivered through housing-led models (which may include Housing First), in which residents are offered mainstream social or private rented tenancies with intensive, non-time limited and person-centred support. Housing First is seen to be advantageous for several reasons:

- Residents have more choice in relation to where they live, and the potential to become more integrated within an 'ordinary' community;
- Support is not tied to the accommodation, so if a resident moves the support moves with them; if they no longer need the support, they do not automatically lose the housing. This reduces some of the challenges around move-on from traditional supported housing models;
- There is no time-limit on the service as in many traditional supported housing models; instead, support stays with the individual as long as it is needed.

Evidence has shown that this housing model results in much better outcomes than other models for those with the most complex, multiple needs compared with being placed in supported housing, and local authorities reported their intentions to introduce or increase housing-led models in their future commissioning and gateway approaches, and to work with existing supported housing providers to transition to this type of provision wherever possible<sup>19</sup>. However, it was stressed that this will likely be a gradual change over years, and the impacts of shifting to a new model will not be identifiable or measurable for a significant amount of time. Pilot authorities with diverse housing markets highlighted the barrier of a lack of affordable housing to the development of their housing-led strategies. Where private and social landlords can access higher rates of rental income by providing specified accommodation, there may be little incentive to offer a general needs or private rented tenancy within Local Housing Allowance rates.

Given that strategic planning was carried out as part of the pilots to inform the local authorities' roles in shaping future supported housing provision, many longer-term impacts are yet to be seen. However, local authorities found the exercise very useful in understanding the supported housing sector in their area, and now have a clearer idea of how to improve it going forward.

*"From a strategic point of view, [the pilot] has really focused in on the scale of the problem that needs to be addressed, and raised the question of how we address that at the national, regional and local levels."*

- Local authority staff, pilot team member

Depending on their local contexts, however, some local authorities highlighted real obstacles to implementing their strategies. For example, Birmingham, which continues to experience growth in its non-commissioned supported housing, highlighted the challenges of writing a strategy where the current funding and regulatory system offers them so little strategic control: they pointed out that they cannot de-commission provision which they did not commission in the first place. They also highlighted the importance of aligning commissioning strategies across health, criminal justice and local authorities.

### **Case Study – Strategic planning (Bristol)**

Bristol undertook a lot of their strategic planning several years ago and are confident that they have a good system in place to make sure that new provision is of a good standard. However,

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<sup>19</sup> See: <https://www.crisis.org.uk/ending-homelessness/the-plan-to-end-homelessness-full-version/solutions/chapter-9-the-role-of-housing-first-in-ending-homelessness/> for a summary of UK and international evidence

they have noticed that while some residents in Bristol progress through their supported housing pathway staircase model (where support gradually decreases until a person is ready to live in mainstream rented accommodation) very successfully, others do not. Bristol used the pilot as an opportunity to understand the reasons behind this.

Bristol's main activity was to interview both those who had successfully moved through supported housing pathways and those who had not, in order to understand these journeys and any factors that contributed to their outcomes. The type of questions asked focused on:

- Residents' situations before moving into supported accommodation and how they were referred;
- How long they had to wait for a place in supported accommodation;
- Expectations of the accommodation before they moved in;
- Experience of supported accommodation – what was good/bad, what made them stay/leave.

Their findings suggested that those who were successful at progressing through the supported housing pathway staircase model were usually placed in smaller facilities that specialised in support for a particular demographic (e.g., people with an alcohol/drug dependence) and where support was highly tailored to their needs. Residents said that they found it encouraging to live with other residents who shared similar goals (e.g., to overcome their alcohol/drug dependence), and support received was highly focused on this.

Interviews with those who had not achieved positive outcomes from the pathway did not yield many useful findings, since they were harder to reach and engage with meaningfully in the research. These difficulties stemmed from their physical and/or mental health, which meant they were not able to contribute significantly, as well as being unwilling to be interviewed without a monetary incentive. However, Bristol City Council do know that many of this group tend to be placed in larger units of supported accommodation where support is less tailored, and where a mix of residents who are currently using substances or are still actively involved in a range of other street-based activities can make these environments very stressful for anyone with mental health issues, experiences of past trauma or a desire to reduce their substance use. Data analysis undertaken as part of this research indicates that clients presenting multiple and complex needs are more likely to have been evicted from, or do not meet the criteria for, smaller shared houses or hostels where they may receive more tailored support in a calmer environment.

*“We’ve identified there is a small cohort of people who don’t benefit from this method of homelessness prevention at all and not only are they not benefitting, but their inclusion is making it difficult for other people that would benefit.”*

- Local authority staff, pilot team member

Bristol is proposing to overcome this problem by exploring other models of housing with support which includes a range of options such as a Housing First approach, High Stability Housing and High Support Clusters. Alternative housing models could mean that clients are placed into a more suitable accommodation setting with an intensive and specialist support package that enables that individual to maintain their tenancy, progress in their support, and develop skills around independence.

*“If you’ve got somebody who’s...chaotic, you put them into the hostel and you know that they’re almost certainly going to fail; you might as well not put them in in the first place. Then you create a more calm environment for the other 75 people who stand a better chance of succeeding in that environment.”*

- Local authority staff, pilot team member

As a result of the pilot, Bristol is now working with providers to explore alternative housing models and other approaches to make sure that placements suit each individual. Within 6-12

months, they would like to see a reduction in unplanned departure rates as a result of different approaches taken to accommodating clients with multiple and complex needs.

### **Case Study – Strategic Planning (Hull)**

Hull City Council used pilot funding to commission an independent expert consultant<sup>20</sup> to conduct their strategic needs assessment.

A first step was to better understand the point in the statutory homelessness system at which single households are presenting and with what outcomes. Through this analysis of 'homeless flows', the project has been able to model what impact improved homelessness prevention performance and better access to mainstream housing options might have on the overall amount of supported housing required for this client group.

Hull City Council were aware that it had, in the past, tended to use supported housing as the default response to single homelessness. The council wanted to collect evidence to estimate actual need for different types of supported housing, in the hope that this evidence could inform better oversight; for example, targeting supported housing places more effectively at those most likely to benefit from them. Alongside this, the council wanted to understand the level of need for alternative pathways and models to better meet the needs of those who do not need the support element, those who need higher levels of support, and those who may be at risk from others and/or pose a risk to others in congregate, hostel or HMO settings.

Through the consultancy and the opportunity for 'focused thinking' created by this and other pilot activities, Hull were able to agree what is meant by 'supported housing' and the different types of models covered by this umbrella term. For the purposes of modelling demand, the consultant developed and tested a set of around twenty indicators designed to help match a person's support needs and any relevant risk factors to different types of housing and/or support interventions.

Over the course of the pilot, the consultant collected primary data on the support needs of an anonymous snapshot of homelessness service users in Hull through two separate surveys. The design of these questionnaires was informed by the agreed indicators matching user profile to intervention type. One survey was completed by Housing Options staff on each single household presenting as homeless or threatened with homelessness over a two-week period. The other was sent out to the non-commissioned supported housing providers in the city, who were asked to supply anonymous data about their current residents' referral sources and support needs.

The survey was focused on generic supported housing; other more specialist forms of accommodation, such as those for younger people, were not included. The exercise found that around 40% of those currently in generic supported housing did not meet the criteria agreed; but that a significant minority of current residents had high and/or complex needs. Around three-quarters of those currently in congregate settings would benefit from dispersed rather than congregate models, due to their vulnerabilities.

The council is now considering whether and how it might work in partnership with providers to explore options for re-purposing and better targeting existing supported provision. It also recognises that improving homelessness prevention and access to mainstream affordable housing will be key to reducing the demand for supported housing moving forwards.

## **9.2 Gateway Approaches**

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<sup>20</sup> Work was conducted by Mark Goldup from Homeless Link, and all findings within this case study may be attributed to him.



As part of the pilots, local authorities<sup>21</sup> worked to establish and/or improve their gateway approaches. These are structures, processes or strategies intended to prevent providers whose proposals do not represent value for money or respond to local needs from setting up in the first place or from expanding their offer.

Local authorities reported that one of the main reasons for the proliferation of non-commissioned supported housing is the lack of effective gateway approaches thus far. Local authorities have typically struggled to monitor and control the establishment of new supported housing providers to ensure quality, value for money and supply which aligns with local demand and strategies. This is due to both a lack of resource and the way in which the current funding and legislative system is designed.

There was a consensus from local authorities that it is much more difficult to tackle poor quality or unscrupulous providers once they have set up supported housing provision.

*“The biggest thing to work on at the moment in the absence of being able to change the law is about new providers...if you do the hard work at the front you'll benefit yourself in the long run in that you'll have good providers coming through, you'll improve the not so good ones and the bad ones you'll have dealt with.”*

- Local authority staff, pilot team member

Therefore, gateway approaches are seen as a key pilot activity that should continue into the future.

Overall, the effects of gateway approaches as part of the pilots have been good; local authorities have reported positive impacts:

Blackburn have reported that the process of dealing with new providers coming into the area has evolved for the better. Where they used to deal with new providers predominantly through sending emails back and forth, which was a lengthy process, the pilot has helped them to identify the importance of going beyond this and visiting properties where necessary, as they can learn much more about a provider this way. The pilot has also given them the confidence to push back where they think providers are potentially trying to exploit residents and/or the local authority.

Blackpool now have only one entry point for new supported housing enquiries which is facilitating the gatekeeper role. A financial assessment into preventing some providers from opening revealed that they saved £2.5 million from this over the pilot period.

Hull have also seen positive impacts, with pilot funding being key to having the capacity to thoroughly challenge new applications. This has resulted in the rejection of one new scheme and part rejection of a further scheme where claims are assessed on a claim-by-claim basis. They are also hopeful that going forward, the gateway approach will filter poor providers out of the supported housing market.

*“The gatekeeper scheme will improve the standard of providers entering the market. Hopefully it will get to the point where providers say we can't meet the requirements so we're not even going to try.”*

- Local authority staff, pilot team member

Despite the overall positive impacts of gateway approaches, there were also some ongoing concerns. For example, Birmingham have still seen growth in the supported housing market in the city even with the gateway activities that have been possible during the pilot. Keeping on top of this will be difficult given that there is no legal ground to withhold payment of claims if they meet all the requirements of the Housing Benefit regulations. Blackpool also flagged that while local authorities may have seen their own gateway approaches as a success, it does not stop providers

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<sup>21</sup> Bristol have had a gatekeeping process in place for several years, so do not appear in these findings

from going to set up in another local authority where there is no or less gatekeeping. Therefore, the problem of managing supply may be shifted rather than resolved.

### **Case Study – Managing New Provision (Blackburn)**

As part of their pilot, Blackburn have produced a robust process to follow when a new provider wants to move into, or extend within, the local area. At each stage, actions and outcomes are clearly identified:

#### **1. A new provider is identified**

- Different members of the multi-disciplinary team are contacted for information:
  - Housing Needs – whether provider has been commissioned, e.g., for severe weather or emergency provision
  - Adult Social Care – whether provider has been commissioned
  - Housing Standards – whether a new scheme is an HMO, whether it needs a license and whether this license has been applied for, whether a site visit has been completed
  - Planning – whether the new scheme is in a permitted development area, whether a site visit has been completed
- Once all information has been collected, they can move onto the next step

#### **2. Resident of new provider applies for Housing Benefit**

- Send provider new provider questionnaire to fill out and advise no further action until Housing Benefit claim received and questionnaire completed
- Provider sends back completed questionnaire

#### **3. New claim for Housing Benefit is started**

- Check that all criteria are satisfied for Housing Benefit form
  - Whether the arrangement meets the criteria for ‘exempt’ or for ‘managed’ categories of specified accommodation, i.e., whether support or supervision is provided by the landlord or on the landlord’s behalf and what type of support is provided;
  - Whether core rent and service charges are reasonable;
  - What the liability structure is.

#### **4. Site visit carried out before Housing Benefit awarded**

- Check that everything in the claim reflects reality

#### **5. Housing Benefit awarded**

**Outcomes:** Blackburn are hopeful that the implementation of this process has deterred landlords who may be more motivated by making a financial gain from supported housing from setting up in the town, and thus the local authority is able to better manage their supported housing supply. However, there is also concern that these providers will try to establish themselves in another local authority area where the gatekeeping process is not as stringent, and/or that they may try to set up again in Blackburn further down the line, highlighting the importance of cross-authority collaboration. Setting up this system was very time-consuming for the local authority, but now that the process is running it has made the system more efficient.

## **Case Study – Managing New Provision (Birmingham)**

Birmingham have devised an ‘Assessment Process Walkthrough’ for new landlords as part of their pilot:

### **1. Check landlord**

- If they are a registered provider, check registration on Regulator of Social Housing website and ensure they are not-for-profit;
- If they are a charity, check charitable status on charity commission’s website;
- If they are a not-for-profit organisation, check details of business and not-for-profit status on Companies House website.

### **2. Check ownership**

- A land register check is done to check if the landlord owns the property;
- If the landlord leases the property, they are asked to provide leases to Birmingham City Council for scrutiny, who will in turn check that the organisation on the lease matches the organisation which will be named as landlord in Housing Benefit claims for specified accommodation;
- Monthly/annual lease charge is checked against core rent to make sure that core rent relates back to property costs;
- Lease document is checked to make sure that landlord can sublet. If they cannot then application will be refused.

### **3. Check for more than minimal care support or supervision**

If the landlord provides the support, they are asked to provide evidence on:

- What support is being given, in the form of support plans and/or needs assessments;
- Staffing, including structure and nature of the role of each person, salaries and the percentage of time spent on support;
- How support is funded;
- Funds to cover the costs of employing support workers, which the council analyse. Housing Benefit should not be used to fund support, so rent levels may be reduced if Birmingham City Council thinks it is being used to pay support workers.

If support is provided by someone else on behalf of the landlord, they are asked to provide evidence on:

- What support is being given, in the form of support plans and/or needs assessments;
- Service level agreements and contracts.

### **4. Checks on rent/eligible/service charges**

The sector manager makes sure that all ineligible service charges (i.e. ones that relate to support) are removed, and that the lease charge corresponds with the rent that residents are being charged.

### **5. Other checks**

As well as the above, Birmingham City Council checks:

- Whether the housing is set up to cater for a specific group of people (e.g. those with issues relating to mental health or substance use);

- How people are referred to the service;
- Whether any information gathered from the resident confirms or contradicts information that the landlord has provided. If there are discrepancies, then Housing Benefit will be refused.

## **6. Housing Benefit authorisation**

Once all the above checks have been completed, the application is passed on to Birmingham City Council's Operations Manager to be authorised.

Over the course of the pilot, Birmingham City Council have received 390 applications from new providers. While 62 of these were granted Housing Benefit, 211 were refused and another 117 had their rents restricted. This means that the gateway approach has likely resulted in savings to the public purse, and residents have benefitted from not being placed in poor provision. However, it should be noted that the number of supported housing units still increased overall during the pilot, indicating that gateway activities will not necessarily stop the problem of oversupply in the city.

# 10. Partnerships, joined up working and provider relationships

*This chapter summarises the intended outcomes and impacts of establishing internal and external partnerships, joined up working processes, and the impact of the pilot on relationships with providers (as set out in the pilot Theory of Change). These are:*

- *Improving processes and systems for provider management, Housing Benefit scrutiny and inspections;*
- *Outcomes are improved for residents and learnings shared between teams.*

## 10.1 Partnerships and joined-up working

The establishment of partnerships, multidisciplinary teams and 'joined up working' have been frequently reported by local authorities as a critical aspect of the pilot activities that were **central to conducting pilot activities effectively, particularly those relating to processes for provider managements and resident outcomes.**

One notable benefit of 'joined-up' working has been 'joining the dots' between different incidents and issues relating to the same property and/or provider that have occurred across different teams (such as adult social care, housing options, planning, the police and fire service), which in turn informs the conduct of Housing Benefit scrutiny and any potential enforcement activities to be carried out on the provider in question. Hull, for example, worked with Neighbourhood Nuisance, Love Your Streets, Making Every Adult Matter and the Hull Domestic Abuse Partnership.

*"I think we've made some really positive outcomes for some residents, and we've made more of a communication path between us all now that just wasn't there before to get advice and raise issues."*

- Local authority staff, Housing Benefit Team

*"What the pilot has enabled us to do is to do that education where there have been gaps, and to bring people together to create a multi-disciplinary team - which we didn't have before, it was quite siloed - it has also given us the capacity to have time to deal with the enquiries... that extra capacity of the pilot has enabled us to be more robust."*

- Local authority staff, pilot team member

Local authorities reported that the pilots had bettered their understanding of the priorities and purposes of other teams to improve the way that they work with each other. For example, local authorities and external partners commonly reported that they now know 'who to go to' when an issue arises and know how to better identify issues traditionally outside of their remit. This in turn prevents issues regarding accommodation or support from falling through the cracks and going unaddressed. This has been reported across various pilot activities including property inspections, care and support reviews, management of new provision and the conduct of Housing Benefit scrutiny. In turn, local authorities reported that **joined up working is likely to improve the quality of accommodation and support, improve resident outcomes, and value for money.**

*“Everyone works together now...an email will be sent across everyone working in [the?] pilot to ensure all the proper measures are taken.”*

- Local authority staff, Housing Benefit team

*“Through the pilot we've been able to build links with planning and housing needs which we didn't have before. We better understand paths into supported housing, and we can see that in many cases no needs review is done at all. Now, when we get claims in we are able to compare with the original needs assessments.”*

- Local authority staff, Housing Benefit team

The use of multi-disciplinary teams to carry out property inspections and reviews of care and support helped ensure that these activities were thorough and accurate. Involving people with lived experience and experts in the field of support provision has enabled local authorities to improve the processes that they use to conduct these reviews (such as amending questionnaires and interview processes). This also has resulted in a much better understanding of resident needs, and what is actually being provided to them than pre-pilot, when Housing Benefit decision-makers typically relied on provider-produced documents and assessments and were concerned that they lacked the care and support expertise to provide effective scrutiny.

*“Is it [Housing Benefit Specialist's] role to monitor the quality of support? Maybe that should be someone who is better qualified.”*

- Local authority staff, Housing Benefit team

The involvement of multi-agency teams has important implications for making judgements about whether the amount of care, support and supervision provided satisfies the criteria for specified accommodation, and in the establishment of better referral pathways between support providers.

### **Case Study – Implementing innovative partnerships – Fire Service (Blackpool)**

In the process of establishing multi-disciplinary teams, Blackpool instituted a partnership with the Lancashire fire service.

The Lancashire fire service attended all pilot inspections, attended weekly pilot meetings, and established a process for reporting into pilot teams when they came across issues of concern as a part of their standard activities.

*“We went to a property where someone had maliciously smashed a fire alarm and set it off. When we arrived, there was no management for resetting it so it was highlighted to us that the management team weren't present. Our internal system is called 'PILE' where we highlight if a revisit from the fire service is necessary. When this was filled out I recognised the address from conversations from the pilot, and so it was raised with the pilot teams. So now, we are doing further inspections with the council on these properties. The pilot team would not have been aware of this without our involvement.”*

- External pilot partner

The multi-disciplinary team also worked together to establish a colour-coded rating system of providers across several categories, of which fire safety was one (alongside cost, quality of support and others). The rating system allocated each provider a 'colour' on a scale from green to red. Inspections attended by the fire service revealed that most properties were yellow or orange, indicating that significant issues were found but that providers were working with them for a resolution. Only a few providers received the most serious rating.

A number of challenges also arose over the course of the pilot, including providers cancelling inspections due to active COVID-19 cases. Another was the fact that the fire service was involved voluntarily at their own cost, and so sometimes found allocating resource and retaining work-life balance difficult. However, it was also mentioned that fire safety resources are often easy to prioritise, given that many of their day-to-day responsibilities have explicit degrees of urgency and prioritisation.

*“It’s ultimately a work-work balance. We have other things to do on top of this, but actually for us it’s quite easy to prioritise because we have a pre-established understanding of urgency of work. For example, if there’s an active fire or fire risk we know this is a greater priority. We just needed to learn how to fit it in alongside everything else.”*

- External pilot partner

Ultimately, the fire service believed that their involvement in the pilot was beneficial both for resident outcomes, and other pilot teams (in terms of conducting accurate scrutiny and managing new provision) and providers. Communication throughout was considered to be both effective and valuable.

*“It’s been an eye opener. For the past few months it’s worked really well. I think we’ve made properties safer.”*

- External pilot partner

*“Whenever we find something concerning we now know who to raise this with, and we know that they’ve sent out adult social care (or the relevant people) to look at the risk they’re in. They’ve then referred those on to crisis needs or other help which has made them safer. Before we would have to put in a safeguarding referral but now it’s streamlined the whole process. We’ve picked up issues in every single building - every resident we’ve seen is safer now.”*

- External pilot partner

*“We can identify when providers have set up and moved residents in against council advice before they receive a Housing Benefit claim.”*

- External pilot partner

*“I also think providers have learned a lot from us about fire safety over the course of the process.”*

- External pilot partner

As a result, they recommended that other local authorities should also be working in a joined-up fashion with fire services, the police, planning and social care, with a recommendation that this should be instituted from the start. It was felt as though their involvement had been incidental or ‘through the back door’ – and that involvement of their teams had notable value at very little cost.

*“It’s important to have all the right people in the room at the beginning - we had come in through the back door. Supported housing is a huge thing for the fire service because they are the more challenging properties where there are fires, especially if they have vulnerable people in them.”*

- External pilot partner

*“The pilot service [by the fire service] hasn’t been a cost to the government at all, because we’ve come in voluntarily for this. They should all be involved in the scheme - and so should the police. They are regulars at this kind of premises.”*

- External pilot partner

Furthermore, they recommended that the fire service should be involved in training for providers so that they understand, and can meet, fire safety requirements, alongside other holistic guidance for setting up.

*“We think there should be a holistic guidance document for providers (that includes fire safety requirements) so that they know before they set up what they need to do.”*

- External pilot partner

Local authorities reported that the pilots are likely to have facilitated structural and cultural change internally, pointing out that the relationships and partnerships built, and processes established of sharing information or data, are likely to be retained post-pilot. However, there were concerns that, without ongoing additional funding post-pilot, this partnership working would be less targeted, with fewer meetings or more sporadic involvement from partners.

*“I think the relationships that we’ve built from the pilot will continue – at least I really hope that they will. In some cases we really need extra resource to make sure that happens.”*

- Local authority staff, pilot team member

## 10.2 Provider relationships

Local authorities broadly reported that **their relationships with providers had either remained the same or improved** (with the latter occurring particularly among the ‘misinformed’ group). Blackburn, for example, reported that ‘relationship building’ with providers has been a key focus of their pilot activity and that, through this, they had been able to dispel negative myths about a number of providers over the course of the pilot and reduce potential resistance from providers to the pilot activities. This sentiment was also shared by Bristol, who pre-pilot had built good relationships with their six providers in the scope of the pilot which helped to ensure good quality of support. Hull has provided free Outcome Star<sup>22</sup> licences for three years and a full 12-month package of free training to providers and free mobile phones to residents in non-council commissioned supported accommodation where they struggle to get in touch. The Council is also designing standardised documents to help providers meet the requirements.

*We had gone into this with a very negative [outlook] of ‘providers are fleeing the market’... and there absolutely are those people but there are also really good providers that struggle to make ends meet .... Providers have been open to working with us which makes it easier, everyone has been very responsive and a positive exercise...we understand [supported housing] now a lot more now than we did which has been really helpful putting things forward for tribunal or refusing a claim.”*

- Local authority staff, pilot team member

However, local authorities also expressed that pilot activities did little to improve engagement with providers of concern. While gateway processes and awareness of the pilot may have deterred the establishment of these schemes to some extent (please see further discussion in section 8), local authorities reported that some providers continued to be unwilling or hesitant to provide the information required to conduct thorough scrutiny of their eligibility or rent charges, a process that often takes time.

Reflecting local authority insights, the providers interviewed were largely positive about the results of the pilots. They pointed out that it helped local authorities and providers to communicate with each other, for example in helping local authorities understand why providers work in the ways

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<sup>22</sup> A popular monitoring and evaluation tool for measuring change over time and impact.



that they do, and helping providers understand the importance of thorough record-keeping and information sharing. Providers interviewed also reported that they welcomed a degree of accountability for improving and retaining standards as facilitated by the pilots, which has provided them the opportunity to receive and act on feedback to improve their provision.

*“I was really happy to hear that the council were doing a review of supported housing, we would like to have feedback on how we can better support our [residents] and have some standards that we can strive for... We’ve been unaccountable for standards for a long time.”*

- Housing provider

*“I think it impressed upon us the importance and the need to record what we’re doing, and we’ve got better at that since.”*

- Housing provider

*“[The council] made a real effort to try and get to understand what we were all about and it wasn’t just a box-ticking exercise, they were actually trying to understand our particular project, to understand how it differs from other ones.”*

- Housing provider

Despite this, providers did mention some challenges or difficulties experienced across the course of the pilots. These included:

- Feeling that communication, at least initially, came across as forceful or threatening;
- Handling cases where residents did not want to be visited or interviewed by council teams on the basis that they didn’t trust council officials;
- The time-cost in responding to information and data requests;
- Council officials making recommendations or actions with regards to support provision without consulting the provider.

*“The emails that were coming from [council employee], felt quite threatening. It was supposed to be voluntary, but it was very much worded like ‘you’ve got to do this or else’. When we were actually doing the inspections it was stressed that this is not the case, that you won’t lose your funding because of anything you say, but however much you say that it can always feel a bit like that...I think because it probably came out of the blue and it had to be done by email, maybe a phone call might have been better to explain it. Sometimes when you see things written down it can seem a bit stark. [I] would have liked an opportunity to meet with [council] and ask questions but appreciate that COVID[-19] made this nigh on impossible.”*

- Housing provider

The providers interviewed for these insights had pre-existing positive or amicable relationships with councils, so there may be further insights that could be gathered via interviews with providers who were ‘misinformed’ or ‘of concern’ in order to understand how they have experienced pilot activities. This is significant given that some intended pilot activities have been prevented or hampered by a lack of provider engagement: Blackburn for example intended to set up a centralised triaging system for assigning individuals to appropriate and tailored housing, but did not progress on this front due to a lack of buy-in from providers.

# 11. Dissemination of learning across local authorities

*This chapter summarises the key areas of learning shared across local authorities, and where there are opportunities for further dissemination.*

Local authorities reported that **being able to communicate and share experiences with other local authorities in the pilot via meetings and the development of ‘good practice’ resources has been a useful exercise in self-reflection, which allowed them to improve and adapt their own processes and activities.** In particular the opportunity to discuss the benefits and drawbacks of different approaches to the below activities were mentioned:

- Property inspections (for example, identifying which teams should be involved and how hazards should be defined and recorded);
- Care and support reviews (for example in designing appropriate interview guides and tips for getting in touch with residents);
- Housing Benefit scrutiny (understanding other approaches to mitigating the effects of regulatory and legislative gaps);
- Methods and tone of communication with providers.

*“We’ve shared our experiences with the other local authorities, it’s almost been like a therapy group at times.”*

- Local authority staff, pilot team member

*“We have also shared learnings, where something has worked in one area or another. We mixed ideas with each other too in a collaborative way.”*

- Local authority staff, pilot team member

Local authorities and their pilot partners have also shared their wider learnings with other authorities or practitioners not directly involved in the pilots, for example by giving advice on particular providers to neighbouring authorities, sharing gateway and Housing Benefit scrutiny processes and template resources, and advising other practitioners on how to determine and encourage higher provider standards and a better resident experience. Blackburn, too, reported that information gleaned from the pilots has fed into the procurement of the local authority’s welfare and debt housing advice service.

However, authorities also mentioned that learning over the course of the pilots could have been improved in particular areas, and highlighted that these may be useful for further discussion, most notably in approaches to managing new supply and making needs projections. It was established that greater sharing and receiving of documents that outline approaches or processes, and having more opportunity to meet or discuss in-person have been helpful in this regard.

*"The sharing could have been significantly better. There were times we asked to see documents or processes from others but we didn't get them."*

- Local authority staff, Housing Benefit team

*"I think that there is not enough information sharing between the authorities, there is a lot more that they could learn from each other and that we could share."*

-Local authority staff, pilot team member

# 12. Conclusions and recommendations

## 12.1 Summary of pilot outcomes

Across pilot areas, there have been varied approaches to pilot activities, given the very different contexts and starting points, but all with the overall aim of trying to improve the local supported housing sector. It is hoped that DLUHC and DWP can build on these to support local authorities to improve national standards in future, and to inform policies to address systemic issues which impact at a national level.

Overall, the pilots have achieved the following key outcomes over 11 months, all pre-requisites to achieving the pilot's longer-term outcomes and impacts as set out in the pilot Theory of Change:

- **Local authorities have been able to understand the need for supported accommodation in their area and plan to meet it.** This has been achieved by carrying out an increased number of more in-depth care and support needs assessments of supported housing residents, mapping supply and developing strategic plans for supported housing going forward. Supported housing has been scrutinised more than ever before due to improving joined up working practices through multidisciplinary teams and conducting support reviews.
- **Residents have provided more feedback on their accommodation and support** through increased engagement, and this has also improved their awareness of standards and processes. This has started to lead to an improvement in the quality of accommodation and support.
- **Local authorities and providers have developed stronger relationships and a better mutual understanding** through liaison around pilot activities such as organising inspections or requesting further information about properties and quality issues. **There is already emerging evidence of improved value for money**, through the scrutiny of new and existing housing benefit claims.
- **Local authorities have improved their processes for responding to safeguarding concerns** and complaints.

This evaluation measured the short-term outcomes from the 11 months of the pilot authorities' work. The initial results are promising, and local authorities were positive about the impact of their work so far. They have also made some progress towards, and laid the groundwork for achieving other longer-term outcomes and impacts set out in the pilot Theory of Change, if they can continue their pilot activities in the same way (see Section 4.3).

As the pilots have only recently come to an end, we are unable to accurately measure longer-term outcomes at this stage. Overall, local authorities expect that the supported housing oversight pilots will lead to a structural and cultural change within their local supported housing sector.

Long-term outcomes will also be strongly dependent on ongoing funding and resourcing for some or all the activities that local authorities have implemented during the pilots. Local authorities emphasised the importance of central government in providing or enabling funding so they can achieve long-term impact, alongside urgent changes to the regulatory framework that will enable them to more effectively address the challenges they have identified throughout the pilot.

## 12.2 Recommendations

The pilots have highlighted the progress that local authorities are able to make with increased resourcing and capacity, but also how the current regulatory system and legislation prohibit effective oversight of supported housing. Pilot authorities' experience suggests that the whole system for funding and regulating supported housing urgently needs wholesale review. Only through this can the provision of supported housing meet residents' needs safely and effectively, and local supply align with local authorities' and their statutory partners' strategies.

**A. Make short-medium term funding available to local authorities to oversee supported housing in their area while longer term reforms (e.g., regulatory and legislative measures) are agreed and implemented.**

Prior to the pilots, with the exception of Bristol, local authorities said that a lack of funding and resource had prevented them from addressing challenges related to supported housing in their areas. The pilot funding enabled them to try new approaches, and expand existing ones, to resource intensive activities such as property inspections or care and support reviews. With the end of the pilot, there is a risk that the progress pilot local authorities have made will stall or lose ground.

- If DLUHC wishes pilot and other local authorities to take an active approach to understanding and better managing supported housing provision in their areas, then they should consider extending funding for work in this area.

Local authorities also commonly reported that completing pilot activities in the timeline of a year was challenging, even without barriers such as the outbreak of COVID-19.

- Based on Bristol's pre-pilot experience, it may be more realistic for DLUHC to fund and see impacts from new activities in the space of approximately 5 years.

**B. DWP should aim to define care, support and supervision, and review regulations around rent levels and subsidy, to strengthen the impact of Housing Benefit scrutiny activities open to local authorities.**

As a result of the pilots, local authorities have been able to dedicate additional time and resource to reviewing and rejecting inappropriate Housing Benefit claims, indicating that pilots have made accommodation costs more reasonable in this time period. However, several regulatory and legal barriers have prevented local authorities from making greater progress.

- The Housing Benefit regulations do not define what is meant by care, support and supervision (CSS). This makes it difficult for local authorities to challenge poor support during the scrutiny process. Even though this may be a difficult task, we recommend that DLUHC and DWP coordinate a working group to develop a definition of CSS so it can be practically applied.
- Local authorities reported that existing Housing Benefit regulations around the calculation of eligible rent, referral to the Rent Officer to challenge rents deemed 'unreasonable', and the rules on subsidy payments were not working as intended. These provisions and their mechanisms require further investigation and review by DLUHC and DWP if local authorities are to apply them.

**C. Strengthen local authority powers to support them to intervene in new supply where it is unnecessary or poor quality.**

Gateway approaches emerged as an important activity during the pilot for local authorities to gain control of supported housing supply.

The evaluation found that it was harder for local authorities to challenge existing Housing Benefit claims than it was to prevent new ones through gateway approaches, which included a standardised cross-Council process that could involve property visits, new assessment processes

and routing enquiries through a single point of contact. Subsequently, throughout the pilot, managing new supply gained ground as a valuable activity even though it was not commissioned as one of the core pilot activities. There would be a value in:

- DLUHC working with pilot local authorities to disseminate their learnings about gateway approaches with other local authorities; and
- Legislative and regulatory change strengthening local authorities' powers to intervene in new supply, for example, by requiring a provider to seek the approval of local authorities before establishing a new scheme.

**D. To improve the quality of support residents receive in supported housing, DLUHC and DWP should review funding and regulation for the support element of supported housing**

The care, support and supervision reviews conducted during the pilots proactively gave residents a voice to their experience, as well as leading improvements in safeguarding and new signposting through partnership working. However, local authorities have expressed concerns about the limited oversight of the quality of support which is possible under the current framework for regulation and funding. Outside of services commissioned by local authorities, the current onus for funding and designing support falls on providers, some of whom lack the motivation, expertise or capacity to supply it. Meanwhile, the most vulnerable residents would not be able to pay for the level of support they require.

- DLUHC should review available options for funding the support element of supported housing so that it meets the standards of support that residents need.
- DLUHC and DWP should consider options for the regulation of support, whilst also assessing the potential burden on providers and the risks associated with this. They should ensure relevant bodies (the Regulator of Social Housing, the Charity Commission and the Office of the Regulator of Community Interest Companies) have sufficient power, resource and expertise to scrutinise the status and governance of specified accommodation providers.

**E. DLUHC could support local authorities to maintain property quality and standards through dissemination of learning and clarifying the Housing Health and Safety Rating System (HHSRS) standards.**

Overall, pilot inspection programmes led to a reduction in hazards and made most properties inspected safer to live in, with approximately half of identified hazards resolved during the pilot period. However, local authorities encountered barriers to addressing hazards in supported housing including weak legislation, cost, time and a shortage of specialist skills.

- Local authorities benefitted from joined up working between different teams and partners when prioritising and undertaking property inspections. We recommend that DLUHC works with pilot local authorities to disseminate their learnings about what worked best so other local authorities can apply them.
- When undertaking property inspections and addressing hazards, local authorities relied heavily on positive provider relationships. DLUHC should act on the findings of the recent HHSRS Review to make the standards it sets out clearer and more easily enforceable for local authorities' use.

**F. Local authorities should be encouraged to conduct their own data collection and modelling to improve their future strategies for their local supported housing market,**

## **and DLUHC's own understanding of how to improve the wider supported housing sector.**

The pilots gave local authorities the opportunity and resource to test and develop data collection and methodologies for strategic planning that they otherwise would not have done. Successful approaches local authorities might wish to trial include:

- collecting primary data through surveys and resident interviews to better match individuals to different models and interventions;
- using existing secondary data about benefits, homelessness and housing, crime and unemployment;
- using modelling to predict future demand for supported housing, based on the success of other activity, such as homelessness prevention.

Local authorities encountered problems with data sharing (from both internal and external stakeholders) as well as problems with accessing the right level of data for their planning. For example, the police, NHS and local authorities may collect data on the same topic but at different geographical levels, making it hard to use in combination. Some of these would need addressing in partnership with DLUHC and DWP before other authorities can widely adopt secondary data use.

In the immediate term, the strategic planning exercises have prompted local authorities to consider alternative models for effective, high-quality supported housing that would meet their areas' needs. Local authorities incorporated the learnings from the strategic planning exercises into their own strategies, which means that the longer-term impacts of the strategic planning activities will only become clear once these have been implemented. Some felt that their ability to implement their own plans was seriously limited by the funding and regulatory context highlighted above.

- When considering wider reforms to the funding and regulation of supported housing, it is important that DLUHC and DWP consider whether these will work for housing-led models such as Housing First as well as for traditional models.
- More affordable one-bed accommodation is also required for local authorities to use when applying housing-led models in their areas. Furthermore, greater availability of this sort of accommodation would help prevent the need for some residents to move into supported housing in the first place and provide timely and sustainable move-on options for those who need a time-limited stay in supported housing.

## **G. Government should revisit pilot value for money calculations to understand whether advantages gained from pilot activity remain over time.**

Local authorities estimated that they had prevented £6.2 m worth of benefits payments being made in error over the course of the pilots through their own calculations, but these come with caveats that claims they are based on were rejected or prevented only temporarily.

- DLUHC and DWP should return to pilot local authorities in September 2022 to request a repeat of the same calculations, to understand whether the advantages estimated by local authorities still stand following any claimant appeals, or adaption of their offer by providers.

## **H. Local authorities looking to adopt activities from the pilots should adopt multi-disciplinary and partnership approaches, plan resource carefully and actively share information and learning.**

Local authorities' activities benefitted greatly from working with external partners or in new joined-up ways with other departments. Local authorities reported that it was important to consider from the outset of the pilot who should be involved in activities, so that the right people were in the right places from the beginning and activities could achieve the best results. Related to this, some pilot

local authorities found resourcing activities a challenge, particularly for roles requiring specialist knowledge, especially since COVID-19 interrupted plans to recruit new staff.

- Rather than relying solely on internal secondments, local authorities delivering similar activities should focus on accurate resource and recruitment planning, and setting up partnerships, before implementing new activities and be ready to adapt timelines.

Local authorities found it helpful to meet regularly as a group with DLUHC and DWP to provide progress updates and share any successes and challenges during the pilot period. Project leads reported that greater information sharing (e.g. of specific process details or pro-forma templates) between areas, or opportunities to meet in person, would have been valuable for conduct and impact of activities, especially relating to managing new provision.

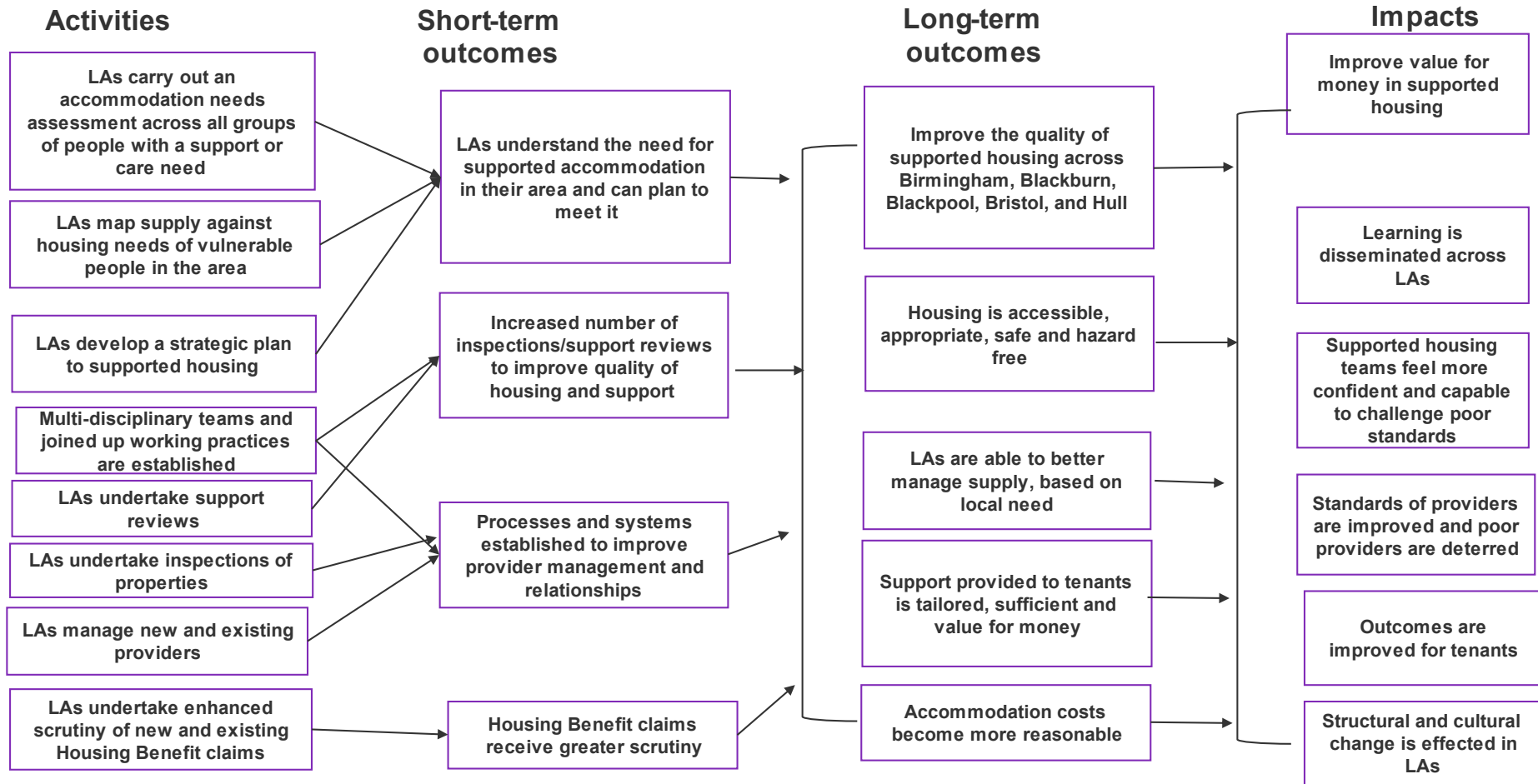
- DLUHC should lead on coordinating and sharing pilot learnings between pilot local authorities. They should consider how to build on the National Statement of Expectations to capture and disseminate learning and best practice from the pilot in an accessible format and in partnership with local authority representative bodies such as the LGA.



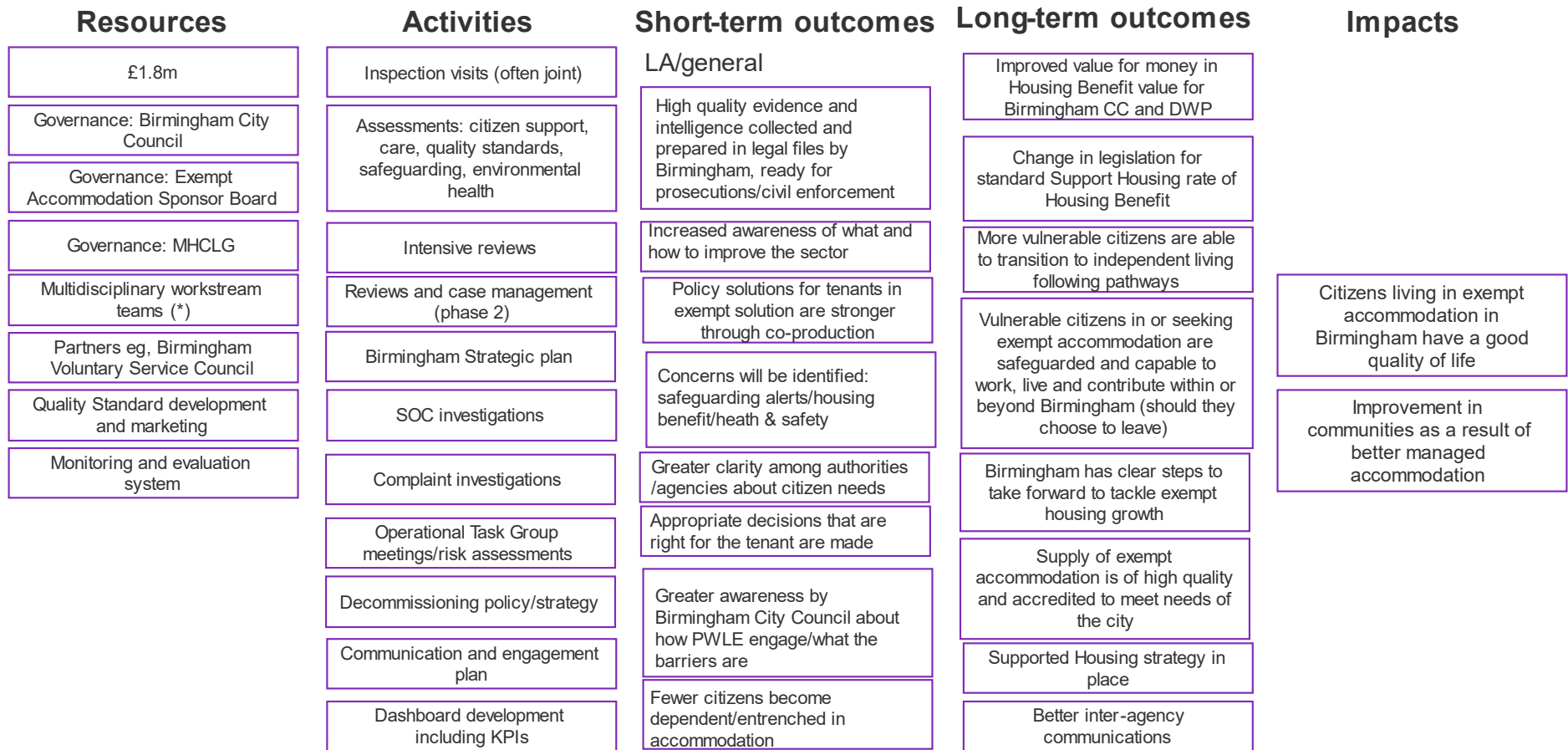
# 13. Appendices

### 13.1 Pilot Theory of Change and logic models

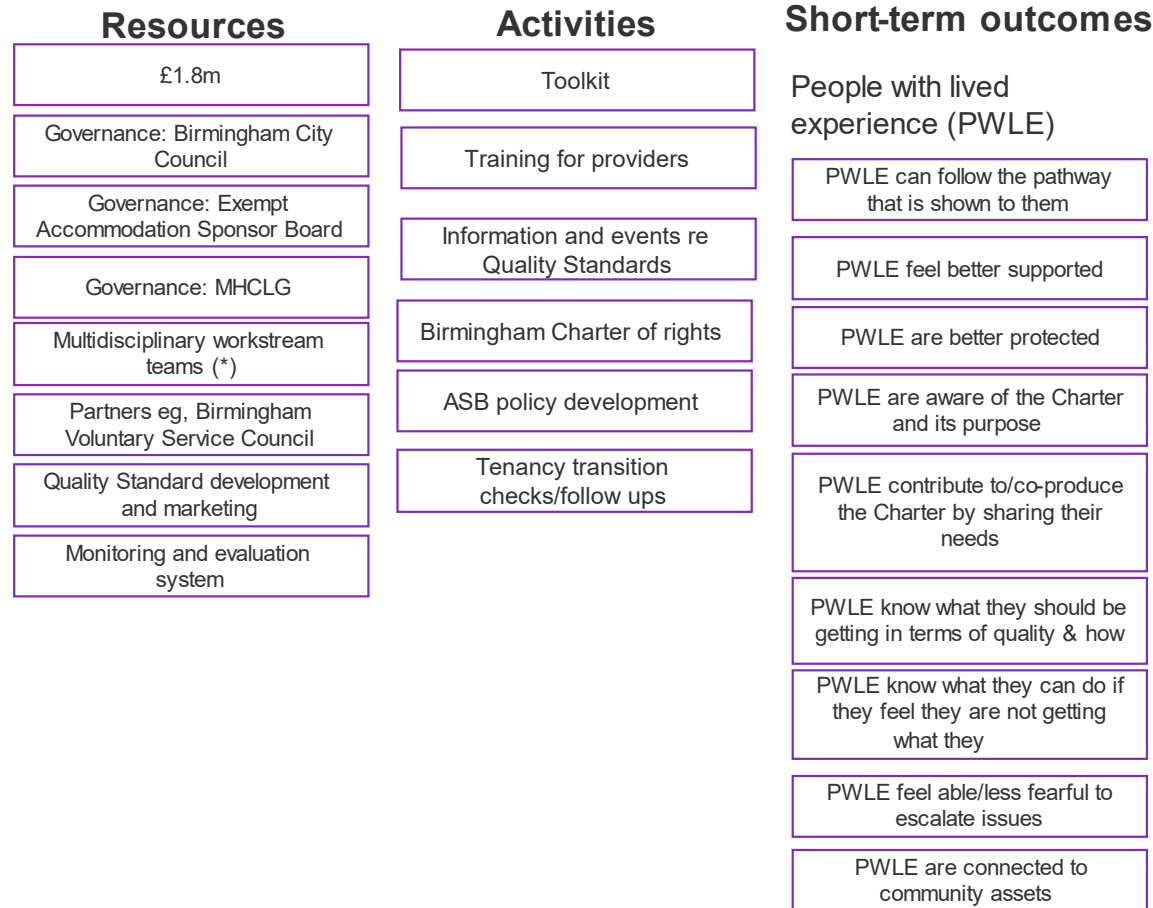
#### Pilot Theory of Change



## Logic model – Birmingham (1/3)



## Logic model – Birmingham (2/3)



## Logic model – Birmingham (3/3)

### Short-term outcomes

Providers/  
Managing agencies

Poor performing providers/  
managing agencies are identified  
and have an improvement plan in  
place

Providers (especially larger ones)  
and management agencies are  
more engaged/willing to improve

Providers/management  
agencies have increased  
awareness of quality standards

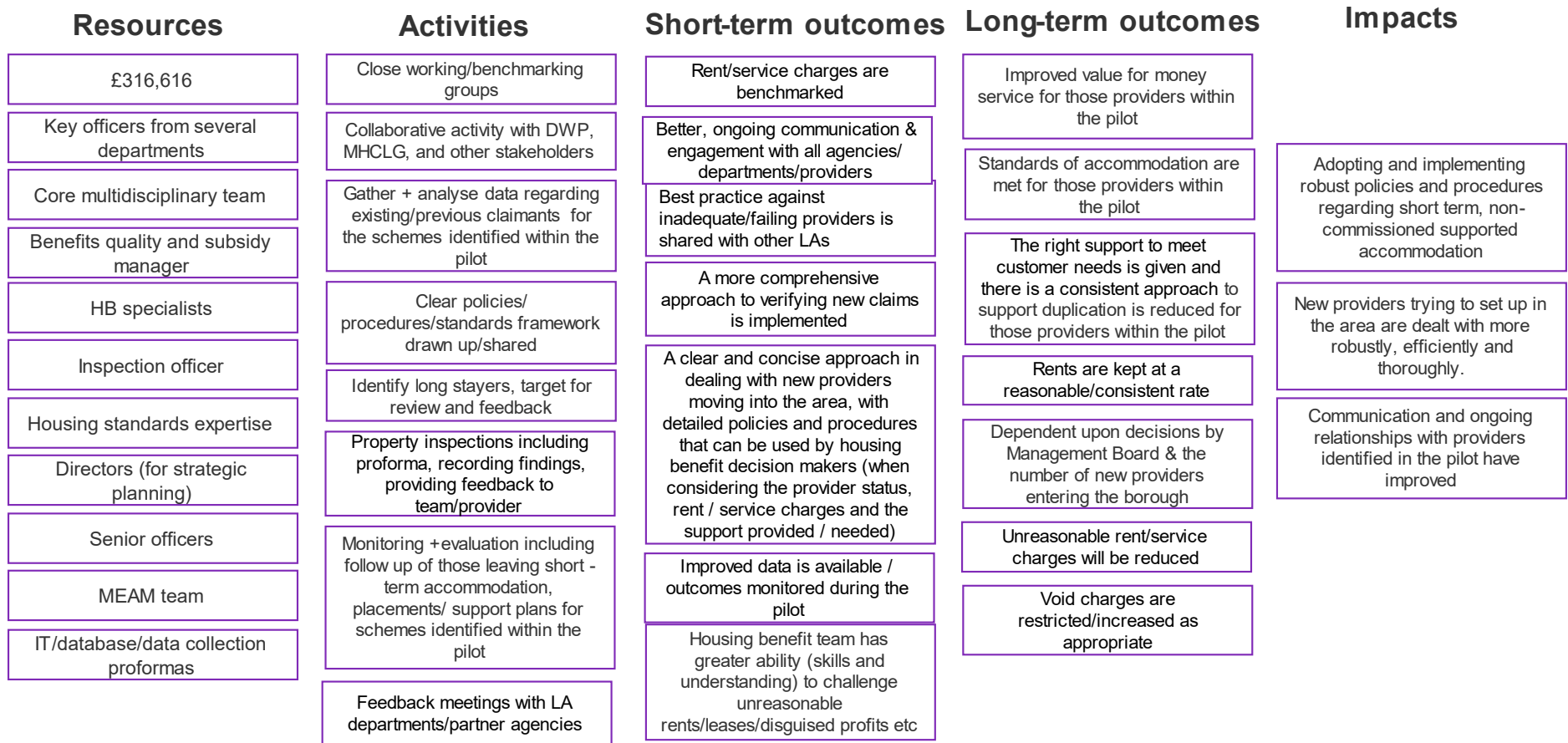
Providers/management agencies  
subscribe to and do quality  
standards self-assessment

Providers/management  
agencies put policies in place re:  
the Charter, eg, ASB policy

Providers/management agencies  
know where to go for help to  
improve

Providers/management agencies  
have the skills to implement the  
Quality Standard

## Logic model 2 – Blackburn (1/3)



## Logic model 2 – Blackburn (2/3)

### Activities

- Discussions with landlords for the schemes identified within the pilot
- Review non-/commissioned care placements identified in the pilot (not all)
- Identification of referral routes
- Work closely with referral parties for the schemes identified within the pilot
- Undertake care & support reviews as permitted given C-19
- Challenge providers identified in the pilot regarding issues from Support plans
- Collection of local data
- Housing benefit scrutiny
- Undertake initial needs/supply planning
- Tenant liaison through support reviews/discussions where possible due to COVID 19 restrictions

### Short-term outcomes

#### Providers

- Providers (reviewed within the pilot) are aware of the standards required in all types of supported housing for the providers
- Providers (reviewed within the pilot) are aware of the issues they need to work on/poor standards and how they can improve
- Providers (within the pilot) confirm that they meet the required standards of support and accommodation in the Borough
- Providers (within the pilot) ensure databases are in place to monitor units, needs, outcomes
- Better understanding of residents' needs (especially of young people) and providers supply
- Better understanding of the customer experience/what needs improving
- Providers are more accountable

**Logic model 2 – Blackburn (3/3)**

**Short-term outcomes    Long-term outcomes**

**Residents**

Residents are more aware of available support

Sufficient support is given to all (vulnerable) customers for the providers reviewed within the pilot

Long stayers are better supported to move forward for the providers reviewed within the pilot

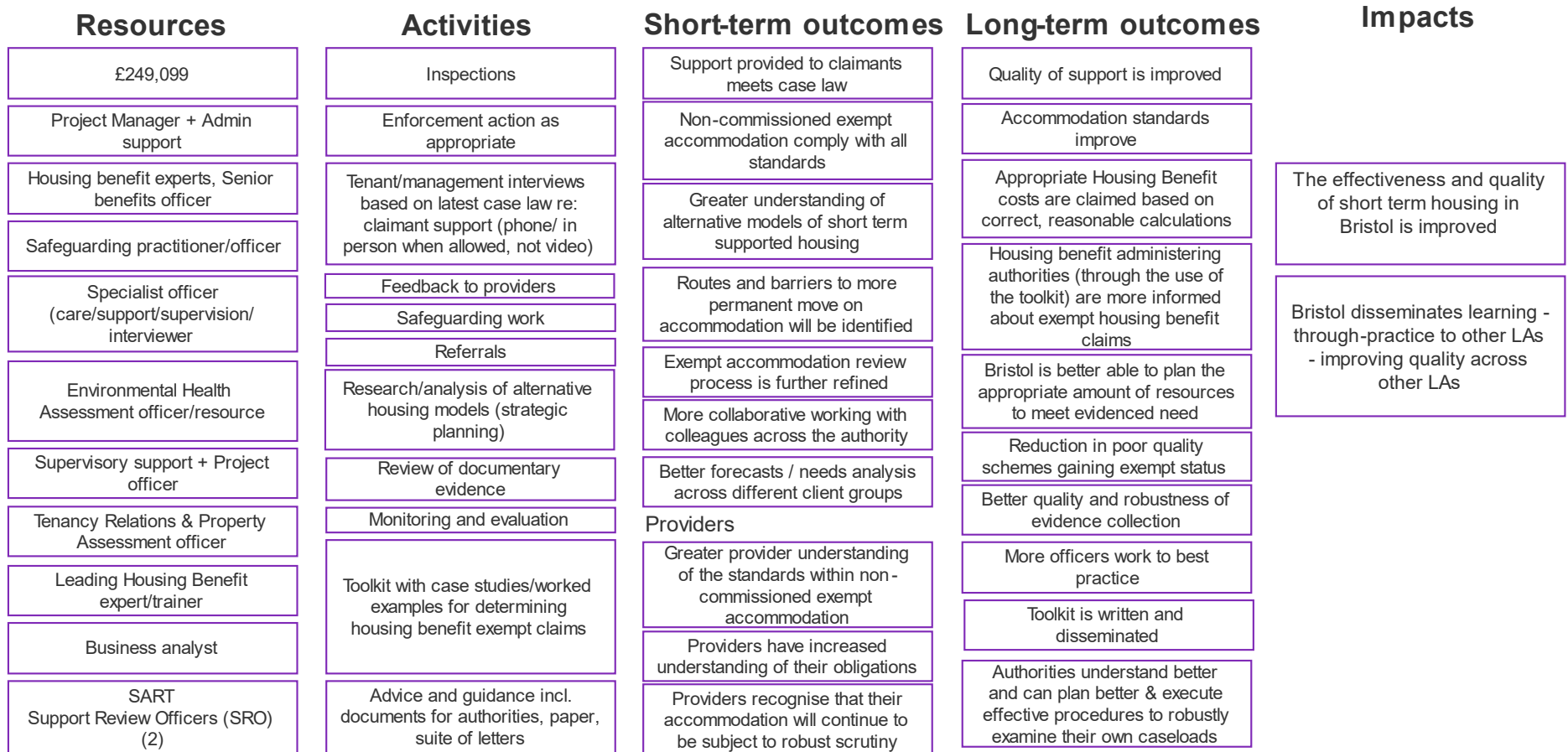
Customers feel confident that they have support from LAs in recognising/helping with issues with provider

Customers have the opportunity to feedback on support

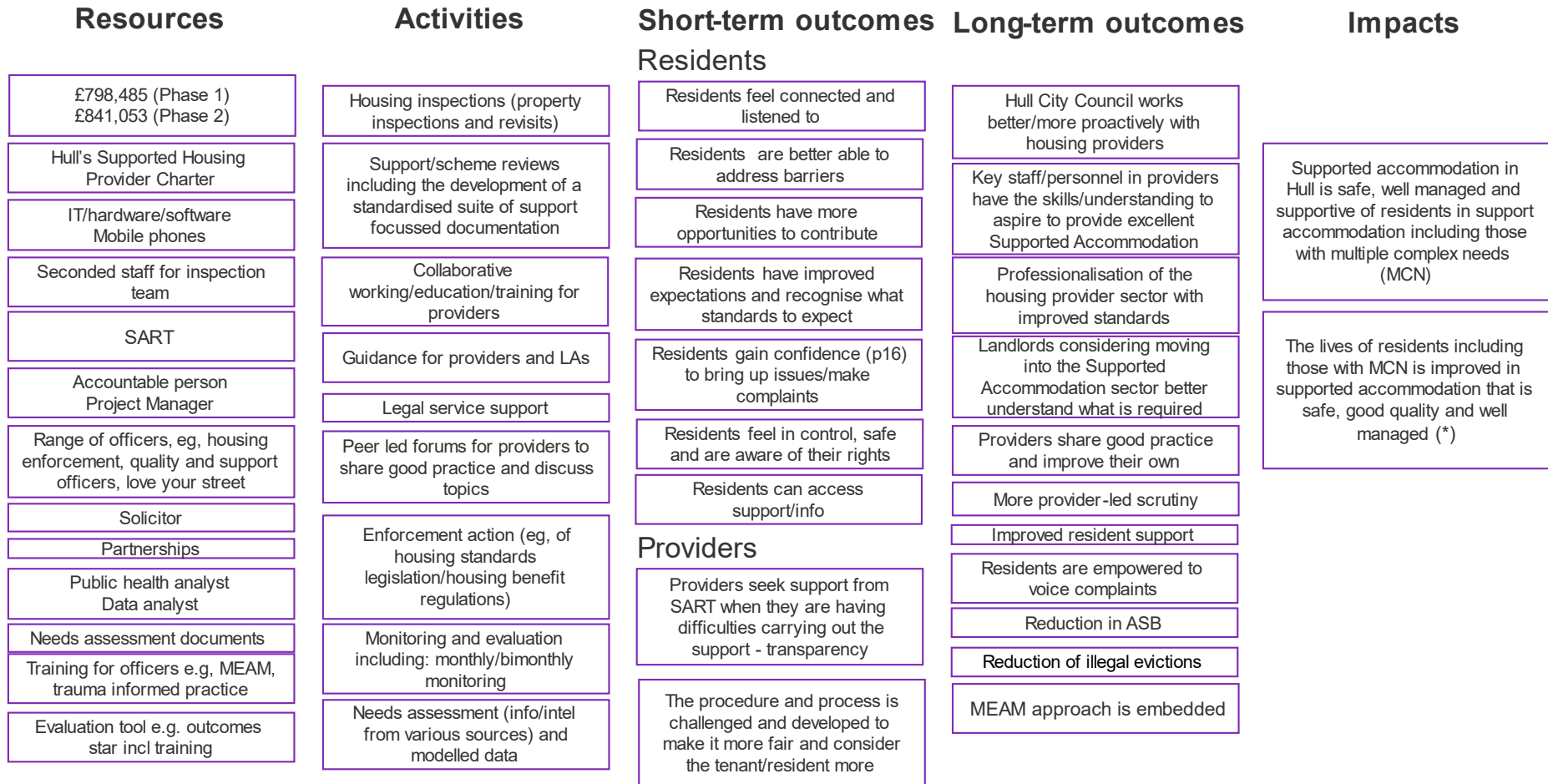
Young people make better life choices



### Logic model 3 – Bristol



## Logic model 4 – Hull (1/2)



## Logic model 4 – Hull (2/2)

### Activities

IT: data and reporting system to be developed
Scrutiny/submission of claims
Strategic planning
Consultation and robust qualitative research
Building/maintaining partnerships (internal & external) including consistent communications with other teams (MEAM, move on/housing options, ASB team, love your streets etc)

### Short-term outcomes

Better connection with Housing Options and Housing Team needed
Providers seek support from SART when they are having difficulties carrying out the support - transparency
Providers share and learn good practice from one another (through forums)
More systematic joined up working between providers
Reduction in hazards
Data capture/reporting system developed to report on projected demand for supported housing
Housing Benefit Department will receive detailed recs from Review Teams
Hull has a strategy outlining need and supply of supported housing
Reduction in nuisances
Safeguarding issues/risks are identified and action is instigated
Better liaison/pathways with C&YPS

### Long-term outcomes

Harm to residents is minimised
Increased independence of residents (p4) including more employment among vulnerable individuals
LA has better/more accurate data on housing needs and supply
Reduced housing benefit costs
Improved value for money

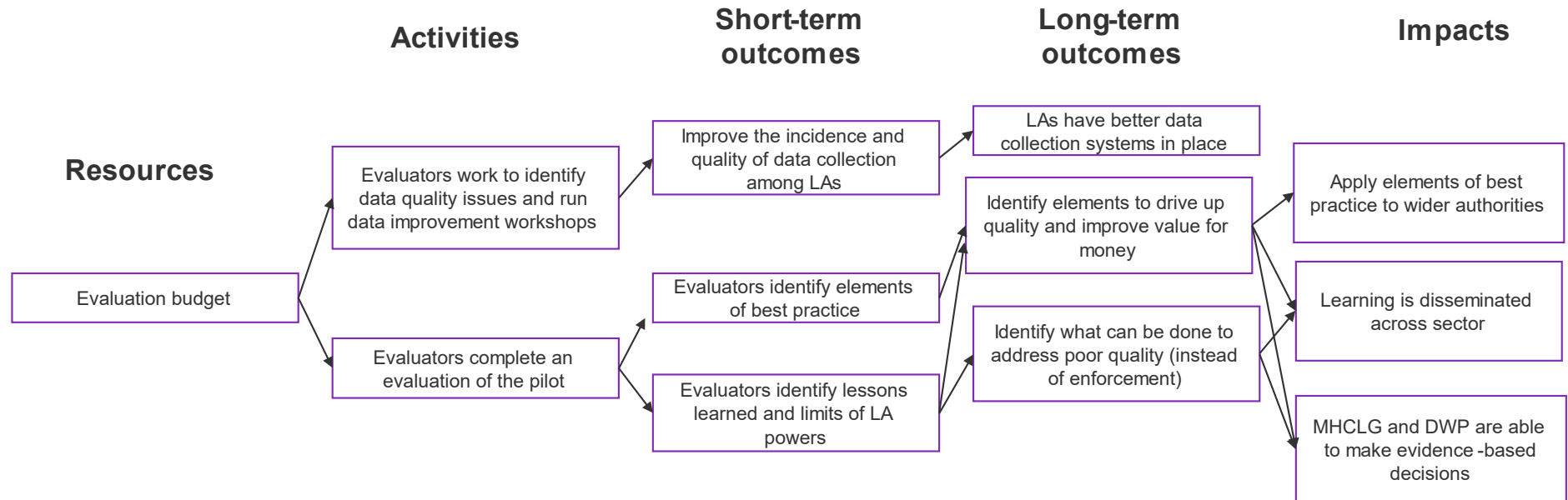
## Logic model 5 – Blackpool

*Please note that Blackpool did not provide feedback on Kantar’s logic model suggestions, hence the different format*

Activities	Outcomes (short-term)	Outcomes (long-term)
Develop a strategy	Council understands which providers we have particular concerns about, or have not been inspected recently in some way	Improved standard of provision of supported accommodation, across the town, which is good value for money
Mapping and information exercise	Council better understands how provision was made in the first place	Fewer opportunistic providers
Investigations re fraud/legal	Council better understands needs of community (through consultation with partners/community groups)	Appropriate allocation to residents with genuine need
Tabletop HB reviews	Implementation of evidence-based recommendations	Reduction in inadequate/unsuitable accommodation
Inspections & HB scrutiny mainly of short-term non-commissioned sector	Identifying and overcoming barriers to delivery	Young people are well looked after/supported to reach independence
Care and support review and assessment	Young people who have experienced care, work together with us to develop local standards	Reduction in costs (p9, though unlikely in this timescale)
Specialist HB advice	Most providers offer a reasonable standard of accommodation	Reduction in ASB
M&E to provide evidence to MHCLG and performance management	Providers better understand the needs of Blackpool residents	
Resident engagement	Support provision improves	
Work plan of inspections and engagement activity		
Direct engagement with community groups		

## 13.2 Research materials

### Evaluation Theory of Change



## 13.2.1 Template of data collection forms

Bimonthly Monitoring Form	
<b>Responsible Officer</b>	
<b>Local Authority</b>	
<b>Date Completed</b>	
<p><i>Notes for completion: To be completed with figures accurately reflecting activity undertaken during months [two month period]. All fields highlighted in yellow must be completed. All figures should represent activities for this period only unless stated otherwise (e.g. if cumulative figures are requested). ALL FIELDS REFER TO THE PILOT WORK ONLY UNLESS STATED OTHERWISE.</i></p>	

Section 1 - Quality of Accommodation				
Notes for completion: we are interested in capturing work that has been undertaken to assess the quality of accommodation as part of the pilot, as well as any actions taken to improve the quality				
Q no.	Question		LA Response	Comments
1	Number of inspections completed (Repeat visits to the same property in a month count as one visit)	Two month period -		
		Cumulative (from Nov to end of [two month period])		
2	Number of Category 1 hazards identified <i>(E.g. threats to physical and mental health from insects and damp)</i>	Total		
		Hazards removed		
		Actions ongoing		
3a	Number of significant Category 2 hazards identified <i>(E.g. threats to health from sub-optimal indoor temperatures)</i>	Total		
		Hazards removed		
		Actions ongoing		
3b	Most common hazards identified (open field)	Open field		
4	Number of tenant complaints received in regard to accommodation	Total Month 1 Month 2		
5	Number of formal and informal actions taken to improve accommodation conditions	Total Month 1 Month 2		
6	Type of actions taken to improve accommodation conditions  <i>Note: an informal notice includes actions such as an email or phone call. Repeat contacts about the same issue count as one action.</i>	Total		
		Informal notices to landlords		
		Hazard awareness notice		
		Improvement notice		
		Emergency remedial action		
		Prohibition order Other [please specify]		
7a	Number of landlord/provider training sessions completed over [two month period] (i.e. a pre-prepared training session)			
7b	Number of agencies trained (over [two month period])			

Section 2 - Quality of Support				
Notes for completion: we are interested in understanding indicators of the quality of support in supported housing, and actions taken to improve support. The following fields are based on [two month period] (separated where appropriate)				
Q no.	Question		LA Response	Comments
8	Number of tenant complaints received in regard to support being provided / on offer	Total		
		Month 1		
		Month 2		
9	Number of safeguarding concerns for individuals received	Total		
		Month 1		
		Month 2		
10	Number of actions taken to providers requiring improvements in tenant support type (e.g. letters to provider requiring improvement)	Total		
		[Enter type of action]		
		[Enter type of action]		
		[Enter type of action]		
		[Enter type of action]		

### Section 3 - Improved Value for Money

Note for completion: all these fields are BASED ON THE MONTHS OF [two month period]. If you do not have the exact figures requested, please provide as much detail as possible on your figures provided in the comments (including how you have calculated the figures provided). Please describe in the comments box the sub-sector of exempt accommodation that you are capturing. All figures should relate to the number of Housing Benefit claims targeted by the pilots (not units or properties).

Q no.	Question	LA Response	Comments
11	Total number of exempt accommodation claims being targeted in this pilot (including commissioned and non-commissioned schemes)		
12	Number of new Housing Benefit claims assessed during this period (two month period)	Accepted	
		Rejected	
13	Number of Housing Benefit re-assessments carried out (two month period)	Total (two month period)	
		Number of claims where Housing Benefits payments were reduced (e.g. where the council accepts the claim but deems the proposed costs unreasonable, challenges a rent increase or agrees a reduced rate directly with the provider)	
		Number of claims reassessed as not specified accommodation due to insufficient support following inspection or support review	
14a	Total amount of Housing Benefit awarded for exempt accommodation being targeted by the pilot	In total (£) (FROM NOV TO end of two month period)	
		In total (£)(two month period)	
14b	Rent and eligible service charges (in total and average) (if known)	On average (per claim)	
		Rent (in total two month period)	
		Average rent per claim (£)	
		Eligible service charges (in total over two month period)	
14c	Ineligible service charges (if feasible to calculate)	Average service charges (per claim)	
		In total (SINCE NOV 2020 to end of two month period)	
		In total (two month period)	
		On average (per claim)	

### Section 4 - delivery

Notes for completion: we are interested in the resources required to implement the work of the pilot. Please give averages (where indicated). We are also interested in any lessons learned from two month period - these can be included in the final box

Q	Question	LA Response	Comments
15	Average time and resource required per inspection <i>This includes all time/resource spent preparing, travelling and writing up any findings/administration</i>	Time taken to inspect (hours)	
		Number of individuals needed	
		Other (please specify)	
16	Number of tenant support reviews completed per household. A tenant support review is a review or check, undertaken by the LA, of the support received by an individual in exempt accommodation. This may happen at the first point a claim is submitted, or at any other time during the tenant's residency.		
17	Average time and resource required per tenant support review <i>This includes all time/resource preparing, conducting reviews and writing up any findings/administration</i>	Time taken to inspect (hours)	
		Number of individuals needed	
		Other (please specify)	
18	Lessons learned / challenges (open field)		

### 13.2.2 Familiarisation discussion guide

#### Introduction (3-5 minutes)

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- **Thanks & introduction:** Introduce yourself and Kantar – independent research agency
- **About the client:** research on behalf of MHCLG
- **Reason for participation:** Their role as local authority lead of a pilot area funded by MHCLG in the SHOP programme
- **How their info will be used:** Their views and experiences will be looked at together with views of others taking part in interviews.
- **Ethical considerations:** Anonymity, confidentiality, voluntary participation
- **Duration:** 45-60 minutes (or whatever time they can give)
- **Reassurances:** No right or wrong answers – we are simply asking about your experiences and opinions; comfort – let me know if you'd like a break at any time
- **Reminder about audio recording:** the discussion will be recorded so that we can accurately capture their views, and so researchers can listen back when analysing the data. The recorder is encrypted and only the research team will have access to the recordings
- **Any questions/concerns?**
- **Start recording:** acknowledge consent for being recorded

#### Participant background (3-5 minutes)

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- Their role / responsibilities at the local authority
- Length of time in role
- Involvement in design and delivery of pilot

#### Overview of the sector in their area (5 minutes)

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- Key issues in the sector in their LA area
  - Summarise demand for supported housing in area e.g. types of cases, sources of referrals
- Why decided to participate in the pilot
- Who are the key stakeholders for the pilot
  - Any feedback from stakeholders at this stage (inc. residents)
- Structures to engage with stakeholders
  - Active provider forums
  - Engagement with non-commissioned providers



## **Overview of the LA pilot (5 minutes)**

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- Need they are addressing with the pilot
  - Probe around need for enforcement powers required to address poor quality
- What would success look like
- Outcomes they expect to see from pilot
- Any barriers/enablers anticipated in achieving outcomes
- Added value of the pilot – what has it enabled the LA to do more of / do differently compared to previous activity in this area

## **Summary of pilot work (10 minutes)**

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*For each stream of work please build on the information available in the bid documents and capture information around inputs, activities, outputs, outcomes, long-term impacts (if known), and mechanisms for how one thing leads to another.*

- Inspections, Housing Benefit scrutiny and other proposed actions to improve quality
- Care and support review assessment
- Strategic planning

## **Pilot setup and delivery so far (10 minutes)**

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- Steps taken to set up the project
- Progress on project inputs, activities
  - Any barriers
  - Any enablers
  - Reason for changes to plan
  - Any other changes to staffing / process etc as a result of changes
- Any new additions to pilot activity since the bid
- Aspects of the brief they feel more / less able to implement
- Impact of COVID-19 on set-up and delivery

## **Data collection (10 minutes)**

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- Self-evaluation activity
  - Plans to collect own data to evaluate pilot
  - Have LAs started to collect self-evaluation data
  - Any initial findings from residents / residents
  - Support required from Kantar
- Data that LA reports back to MHCLG throughout pilot
  - Where / who do they collect it from
  - Ease / difficulty of collection
  - Accuracy of data
  - Any shortcomings of data

- Any shortcomings of collection process

## **Lessons learned so far (5 minutes)**

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- What interventions are working well / less well to date
- Improvements that could have been made to the set-up phase
- Reflections on the data collection process
- Key recommendations to MHCLG and DWP

## **Thank and close.**

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- Anybody else who they think might be useful for us to speak to – collect contact details
  - (This could be people in their department, members of cross-operational teams, or external stakeholders)

### 13.2.3 Phase 1 stakeholder discussion guide

## Participant Background (8 minutes)

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Objective: Understand participant's role in Supported Housing Oversight Pilot

*IMPORTANT MODERATOR NOTE: Interviewer to highlight all activities mentioned on Local Authority activity summary to inform later discussion.*

- **Participant information**
  - Job title
  - [IF EXTERNAL] Organisation
  - Responsibilities in role (brief)
  
- **Involvement in the Supported Housing Oversight Pilot**
  - Confirm involvement in [EVALUATION AREA / RESPONSIBILITIES IDENTIFIED IN SAMPLE FILE]
  - Probe for detail on involvement in specific activities within this strand
  - Involvement / cross-over with in any other strands of the Supported Housing Oversight Pilot
    - Strategic Planning
    - Housing Benefit / Inspections / Quality
    - Care and Support Review Assessments
    - Monitoring and Evaluation
    - Other
  - Other teams / actors / organisations worked with
  - Level of involvement
  - Frequency of involvement

## Understanding objectives and experiences (10 minutes)

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Objective: Investigate LAs' understanding of objectives and experiences

*IMPORTANT MODERATOR NOTE: Each individual pilot area has their own objectives, but they should tie in with overall MHCLG objectives. LAs objectives won't perfectly match and some areas might emphasise some objectives more than others. Overall MHCLG pilot objectives are:*

- a) *Improving the quality of accommodation and support in short-term supported housing;*
- b) *Improving value for money in supported housing and better oversight of Housing*

*Benefit claims;*

- c) *Testing the effectiveness of LA interventions to drive up quality and improve value for money that could be more widely adopted;*
- d) *Testing whether existing LA enforcement powers are sufficient to address poor quality, and understanding barriers to enforcement;*
- e) *Testing approaches to data collection and ensuring a better picture of local supply (what provision exists in each area) and local demand.*

- **Understanding of strategic objectives, outputs and outcomes**

- Desired outcomes from the activities / strands they have identified as being involved in
- Desired outcomes from / aims of the pilot as a whole

- **Summarise experience of setting up Pilot activities as a whole**

- Key challenges in achieving outcomes and why
  - Prompt COVID
- Key progress against outcomes – and why

## **Housing Inspections / Quality**

**(20-30 minutes)**

Objective: Investigate LAs' experiences of implementing Housing Inspections / Quality activities and views about early effectiveness

*IMPORTANT MODERATOR NOTE: Property Inspections activity and Enforcement activity may overlap, please be particularly wary of duplication*

- **Property Inspections activity**

- Describe approach to property inspections
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Specific activities completed so far
  - Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
- Systems for recording information
- Any barriers in conducting property inspections
- Overcoming barriers (incl. any innovation, partnership or enabling factors)

- Outcomes intended
- Effectiveness so far of Property Inspections in meeting outcomes (any cases of interest?)
- **Enforcement Activity**
  - Describe Enforcement activities
    - Resources used – were adequate resources sourced?
    - Actors / Partnerships Involved
    - Processes – process steps and who is responsible for each element
    - Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
  - Systems for recording information
  - What powers / grounds are used for enforcement?
  - What factors trigger enforcement activity – have these changed over the course of the pilot? Why?
  - What enforcement activity was being conducted before the pilot?
  - Barriers to conducting enforcement activity
    - Listen out for and probe for more detail if mentioned: gaps / loopholes / vagueness in laws & regulation
  - Overcoming barriers (incl. any innovation, partnership or enabling factors)
  - Intended outcomes of enforcement activity
  - Effectiveness so far of Enforcement Activity in meeting outcomes (any useful examples to be used for a case study, any unintended consequences?)
    - Any written / recorded evidence of effectiveness?
  - Plans for rest of pilot
    - Are current grounds / powers for enforcement sufficient? If no, what is needed?
- **Any other Housing Inspections / Quality improvement activities**
  - **Blackburn:** *Creating a localised HUB acting as a triage / referral system - facilitate a database of customer needs / feedback forum*
  - **Hull:** *Love Your Streets, Scores on the Doors*
  - **Birmingham:** *Quality standards and provider accreditation, Charter of Rights*
  - *Provider training*
  - Describe approach
    - Resources used – were adequate resources sourced?
    - Actors / Partnerships Involved
    - Processes – process steps and who is responsible for each element
    - Specific activities completed so far

- Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
- Systems for recording information
- Any barriers experienced
- Overcoming barriers (incl. any innovation, partnership or enabling factors)
- Outcomes intended
- Effectiveness so far of Housing Inspections / Quality activities
- Plans for rest of pilot

## **Housing Benefit Claim Scrutiny (10-20 minutes)**

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Objective: Investigate LAs' experiences of Housing Benefit Claim Scrutiny and views about early effectiveness

*IMPORTANT MODERATOR NOTE: Interviewees should be very familiar with understanding 4 categories of specified accommodation. More detail can be found at:*

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/572454/rr927-supported-accommodation-review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/572454/rr927-supported-accommodation-review.pdf).

*According to Housing Benefit regulations, 'Vulnerable residents' are those:*

- *Over the State Pension Age*
- *Incapable of work*
- *Responsible for children*

- **Housing Benefit Claim Scrutiny**

- Approach to Housing Benefit claim scrutiny
- What triggers Housing Benefit claim scrutiny? Why might a claim need scrutiny (i.e. change of circumstances / not new claims).
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
  - Any joining up with Care and Support Reviews / Inspection / Enforcement activity
- Applying policy and regulation to daily practice

- Understanding of 4 categories of specified accommodation (*Exempt accommodation, Managed properties, Refuges, LA Hostels*)
- Deciding what is 'more than minimal' care / support / supervision.
- Where necessary, process of identifying suitable alternative accommodation
- Interrogation of charges/funding
  - Process of identifying and determining eligible/ineligible charges
  - How care/support funding sources are identified
  - Process of assessing rent as 'reasonable' or unreasonable'
- Identifying landlord type
- Any barriers in scrutinising Housing Benefit claims
  - Listen out for / probe on: lack of clarity / guidance, issues with regulation, concerns with practicalities, resources, skills,
- Overcoming barriers (incl. any innovation, partnership or enabling factors)
- Intended Outcomes of Housing Benefit Claims scrutiny
- Value for Money (if not mentioned, please prompt)
  - How do you assess VfM in relation to specified accommodation claims?
    - How is 'poor provision' identified?
    - Requesting a breakdown of scheme costs – is this done, how is this done, when is it done (as standard or just when rents are high?). Who is making decisions about these actions?
    - Collecting evidence that support is provided – is this done, how is this done, when is it done (as standard or just when rents are high?). Who is making decisions about these actions?
  - Does this vary by type of claim/ category of specified accommodation?
  - (How and why) has this changed as a result of the pilot? (has it been more effective since pilot?)
- Effectiveness so far of HB Scrutiny in meeting intended outcomes
- Plans for rest of pilot

## **Care and Support Review Assessments (10-20 minutes)**

Objective: Investigate LAs' experiences of implementing Care and Support Assessment activities and views about early effectiveness

*IMPORTANT MODERATOR NOTE: A Care and Support Assessment would be counted as any work to check/review the support provided either within a property, or to an*

*individual. This could be part of an assessment of a new HB claim, a re-assessment of an existing HB claim, or a standalone review.*

- **Care and Support Assessments**

- Describe approach to Care and Support assessments/reviews (ensure definition used is as outlined above)
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Specific activities completed so far
  - Any changes over time in approach / process / resources and why – how was this change managed. Have they developed resulting from additional resources? What have you been able to add / develop as a result of the pilot compared to what was happening before?
- Any barriers in conducting Care and Support Assessments
- Overcoming barriers (incl. any innovation, partnership or enabling factors)
- Intended Care and Support Assessment outcomes
  - What happens if assessments reveal care / support is:
    - not ‘more than minimal’?
    - poor, but more than minimal?
- Effectiveness so far of Care and Support Assessments in meeting outcomes
- Plans for rest of pilot

- **Any other Care and Support Review Assessment activities**

- **Blackpool:** Co-production / evaluation with those of lived experience to ensure that the accommodation and support available to care-leavers supports them to achieve good outcomes
- Describe approach
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
- Any barriers experienced
- Overcoming barriers (incl. any innovation, partnership or enabling factors)
- Outcomes intended
- Effectiveness so far of Care and Support Review Assessments in meeting outcomes
- Plans for rest of pilot
-



## Strategic Planning (10-20 minutes)

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Objective: Investigate LAs' experiences of implementing Strategic Planning activities and views about early effectiveness

- **Local Needs and Supply Assessments**

- Describe approach and process to needs and supply assessments
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Specific activities completed so far
  - Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
- Data sources used / needed
- Systems for recording information
- Barriers in conducting needs and supply assessments
- Overcoming barriers (incl. any innovation, partnership or enabling factors)
- Outcomes intended
- Effectiveness so far of Local Needs and Supply Assessments in meeting outcomes
  - How will the assessments influence future supply of supported housing (commissioned & non-commissioned)

- **Any other Strategic Planning activity**

- **Hull:** Market Provider Development and Resident Improving Expectations documents
- Describe approach
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Specific activities completed so far
  - Any changes over time in approach / process / resources and why – how was this change managed
- Systems for recording information
- Any barriers experienced
- Overcoming barriers (incl. any innovation, partnership or enabling factors)

- Outcomes intended
- Effectiveness so far of in meeting outcomes

## Partners and Relationships (5-10 minutes)

Objective: Investigate LAs' experiences with partners / relationships and the value of these

- **Partnerships and Relationships**

- Describe approach to any partnerships and relationships (External & Internal)
  - Resources used – were adequate resources sourced? (incl. staff time).
  - Processes – process steps and who is responsible for each element (ensuring accountability)
  - Project / Partnership Management process (who reports to who? How do the teams communicate / meeting frequency?)
  - Specific activities completed so far
  - Any changes over time in approach and why – how was this change managed
- Length of time working relationships established
- Any areas of agreement / tension / improvement and why
- Overcoming any challenges – how

## Conclusion and lessons learned (5-8 minutes)

Objective: Gather key recommendations, summarise and close

- **Lessons learnt**

- Any key recommendations for achieving outcomes

- **Any areas for further exploration**

- **Thanks and Close, opportunity for final questions**

*Is there any documentation that you'd be willing to share with us on the topics we've been discussing?*

- *Will help us evidence the detail around your points e.g. aim to conduct X number of inspections*
- *Helps bring the topic to life for us when we don't work on it day to day*

why

- *Stored securely and protected in the same way as all the data we gather for this study*

### 13.2.4 Phase 2 stakeholder discussion guides

#### LA Leads

## Participant Background (8 minutes)

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Objective: Understand participant's role in Supported Housing Oversight Pilot

- **Participant information**
  - Job title
  - Responsibilities in role
  
- **Involvement in the Supported Housing Oversight Pilot**
  - What they do day to day, responsibility for any specific activities
    - Whether they have any responsibility for/knowledge of data collection
  - Other teams / actors / organisations worked with
  - Level of involvement
  - Frequency of involvement

## Progress review (10 minutes)

---

Objective: Confirm pilot objectives and explore any changes to pilot since phase 1

*IMPORTANT MODERATOR NOTE: Each individual pilot area has their own objectives, but they should tie in with overall MHCLG objectives. LAs objectives won't perfectly match and some areas might emphasise some objectives more than others. Overall MHCLG pilot objectives are:*

- f) Improving the quality of accommodation and support in short-term supported housing;*
- g) Improving value for money in supported housing and better oversight of Housing Benefit claims;*
- h) Testing the effectiveness of LA interventions to drive up quality and improve value for money that could be more widely adopted;*
- i) Testing whether existing LA enforcement powers are sufficient to address poor quality, and understanding barriers to enforcement;*
- j) Testing approaches to data collection and ensuring a better picture of local supply (what provision exists in each area) and local demand.*

- **Understanding of strategic objectives, outputs and outcomes**
  - Desired outcomes from / aims of the pilot as a whole
  - How outcomes are being measured/recorded
  - Have there been any changes/developments to your pilot since we last spoke?
    - If yes, what changed and why?
    - *Probe: structure of team, partnerships, activities, data collected*
  - Have there been any changes/developments to the objectives through the course of the project?
    - If yes, what changed and why?
  - Have there been any changes/developments to team structures or partnerships?
    - If yes, what changed and why?
  - Have there been any changes/developments to who is doing what?
    - If yes, what changed and why?
- **Overview of progress**
  - What activities have been undertaken and what have been the outcomes/impacts
  - Any activities that have not been completed and why
  - How does the actual implementation of the pilot differ from bid/original plan  
*Probe: items in original bid/LA ToC*

## **Experiences of delivery (10-20 minutes)**

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*IMPORTANT MODERATOR NOTE: It is envisaged that this section is most relevant to LA leads, but can touch on for other stakeholders if relevant*

- **Overall reflections and lessons learned**
  - Experience of delivery *Spontaneous first, then probe different pilot strands (inspections, HB, care and support, strategic planning, managing new providers)*
  - Where have activities been effective in achieving outcomes and why *Probe: quality of accommodation and support, improving VfM and oversight of HB claims*
    - What are you most proud of from pilot activities (if at all)?
    - Any areas of best practice where other LAs could learn from them
  - Where have activities not been effective in achieving outcomes so far and why *Probe: any unintended negative impacts (managing new supply)*
  - Whether outcomes are directly attributable to pilot (and its funding) or whether other factors have come into play
  - Would they do anything differently if they ran the pilot again and why
  - Key lessons learned *Spontaneous, then:*
    - Did they learn anything from other pilot areas
    - How will learnings be retained/built on after pilot ends

## Housing Inspections / Quality (5 minutes if needed)

---

Objective: Investigate LAs' experiences of implementing Housing Inspections / Quality activities and views about early effectiveness

*IMPORTANT MODERATOR NOTE: Property Inspections activity and Enforcement activity may overlap, please be particularly wary of duplication*

- **Property Inspections activity**
  - Recap approach *Probe on information we already have*
  - Any barriers in conducting property inspections and how overcome
- **Outcomes**
  - Outcomes intended
  - How outcomes are measured/quantified (*Probe which data above is most useful for measuring outcomes*)
  - Outcomes achieved/changes identified
    - *ToC: Supported housing teams feel more confident and capable to challenge poor standards*
    - *ToC: Standards of providers are improved and poor providers deterred*
    - *ToC: Outcomes are improved for residents*
  - Effectiveness of property inspections in meeting outcomes (*if ineffective, why?*)
    - Anything particularly proud of
    - Anything that could have gone better

## Housing Benefit Claim Scrutiny (5 minutes if needed)

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Objective: Investigate LAs' experiences of Housing Benefit Claim Scrutiny and views on effectiveness

*IMPORTANT MODERATOR NOTE: Interviewees should be very familiar with understanding 4 categories of specified accommodation. More detail can be found at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/572454/rr927-supported-accommodation-review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/572454/rr927-supported-accommodation-review.pdf).*

According to Housing Benefit regulations, 'Vulnerable residents' are those:  
- Over the State Pension Age

- Incapable of work
- Responsible for children

- **Housing Benefit Claim Scrutiny**

- Recap of approach *Probe on information we already have*
- Any barriers in conducting HB scrutiny and how overcome
- Probe on:*
  - Covid
  - Poor guidance on definitions – e.g. ‘more than minimal’

- **Outcomes**

- Outcomes intended
- How outcomes are measured/quantified
- Outcomes achieved/changes identified
  - *ToC: Improve value for money in supported housing*
  - *ToC: Supported housing teams feel more confident and capable to challenge poor standards*
  - How these changes are attributable to the pilot, how outcomes are evidenced
- Effectiveness of property inspections in meeting outcomes (*if ineffective, why?*)
- Anything particularly proud of
  - *Blackburn: benchmarking service charges*
- Anything that could have gone better
  - *Probe: Example of LA limitations/opportunities in challenging rent or rejecting SEA status, including whether they’re taken to tribunal and how that plays out, any best practice*

## **Care and Support Review Assessments (5 minutes if needed)**

*Objective: Investigate LAs’ experiences of implementing Care and Support Assessment activities and views about early effectiveness*

**IMPORTANT MODERATOR NOTE:** A Care and Support Assessment would be counted as any work to check/review the support provided either within a property, or to an individual. This could be part of an assessment of a new HB claim, a re-assessment of an existing HB claim, or a standalone review.

- **Care and Support Assessments**

- Recap of approach – *Probe on information we already have*
- Any barriers in conducting Care and Support Assessments and how overcome

Probe on:

- Covid
- Poor guidance on definitions – e.g. ‘more than minimal’

- **Outcomes**

- Outcomes intended
- How outcomes are measured/quantified – *for individuals and the activity itself*
- Outcomes achieved/changes identified
  - *From ToC: Supported housing teams feel more confident and capable to challenge poor standards*
  - *From ToC: Standards of providers are improved and poor providers are deterred*
  - How these changes are attributable to the pilot, how outcomes are evidenced
- Effectiveness of care and support reviews in meeting outcomes (*if ineffective, why?*)
  - Anything particularly proud of
  - Anything that could have gone better

## Perceived impacts

(10 minutes)

Objective: Gather information on the perceived impacts of each pilot

**IMPORTANT MODERATOR NOTE:** *It is envisaged that this section is most relevant to LA leads, but can touch on for other stakeholders if relevant*

- What impacts observed
  - Probe (if not mentioned already):
    - *Improved VfM in supported housing*
    - *Learning disseminated across LAs*
    - *Supported housing teams feel more confident and capable to challenge poor standards*
    - *Standards of providers are improved and poor providers are deterred*
    - *Outcomes improved for residents*
    - *Structural and cultural change effected in LAs*
- How impacts have been monitored/tracked
- Have any groups of people been positively/negatively affected more than others
- Any impacts they expected to see but have not, and why
- Any unexpected benefits or negative consequences
- Any data/resources to share with evaluation team



## Conclusion

(2 minutes)

---

Objective: Gather key recommendations, summarise and close

- **Any closing comments**
  - What's the most important thing we should take away from this discussion
  - How far can the progress in your LA be replicated / inform other areas? (Or is much of this local specific, e.g. partnerships / nature of local housing / provider markets)
  - Is there any other data that we aren't currently collecting that you think will demonstrate the impact of the pilot (or demonstrate why impact is limited?)
- **Ask to share documentation**
  - Will help us evidence the detail around your points e.g. aim to conduct X number of inspections
  - Helps bring the topic to life for us when we don't work on it day to day
  - Stored securely and protected in the same way as all the data we gather for this study
- **Any areas for further exploration**
- **Thanks and Close**

## Strategic Planning

### Participant Background (8 minutes)

---

Objective: Understand participant's role in Supported Housing Oversight Pilot

*IMPORTANT MODERATOR NOTE: Interviewer to highlight all activities mentioned on Local Authority activity summary to inform later discussion.*

- **Participant information**
  - Job title
  - [IF EXTERNAL] Organisation
  - Responsibilities in role (brief)
- **Involvement in the Supported Housing Oversight Pilot**
  - Confirm involvement in [EVALUATION AREA / RESPONSIBILITIES IDENTIFIED IN SAMPLE FILE]
  - Probe for detail on involvement in specific activities within this strand
    - Whether they have any responsibility for/knowledge of data collection
  - Involvement / cross-over with in any other strands of the Supported Housing Oversight Pilot
    - Housing Benefit / Inspections / Quality
    - Care and Support Review Assessments
    - Monitoring and Evaluation
    - Other
  - Other teams / actors / organisations worked with
  - Level of involvement
  - Frequency of involvement

### Progress review (10 minutes)

---

Objective: Confirm pilot objectives and explore any changes to pilot since phase 1

*IMPORTANT MODERATOR NOTE: Each individual pilot area has their own objectives, but they should tie in with overall MHCLG objectives. LAs objectives won't perfectly match and some areas might emphasise some objectives more than others. Overall MHCLG pilot objectives are:*

- k) *Improving the quality of accommodation and support in short-term supported*

*housing;*

- l) Improving value for money in supported housing and better oversight of Housing Benefit claims;*
- m) Testing the effectiveness of LA interventions to drive up quality and improve value for money that could be more widely adopted;*
- n) Testing whether existing LA enforcement powers are sufficient to address poor quality, and understanding barriers to enforcement;*
- o) Testing approaches to data collection and ensuring a better picture of local supply (what provision exists in each area) and local demand.*

- **Understanding of strategic objectives, outputs and outcomes**

- Desired outcomes from the activities / strands they have identified as being involved in
- Desired outcomes from / aims of the pilot as a whole
- How outcomes are being measured/recorded
- Have there been any changes/developments to the objectives through the course of the project?
  - If yes, what changed and why?
- Have there been any changes/developments to team structures or partnerships?
  - If yes, what changed and why?
- Have there been any changes/developments to who is doing what?
  - If yes, what changed and why?

- **Overview of progress**

- What activities have been undertaken and what have been the outcomes/impacts
- Any activities that have not been completed and why
- How does the actual implementation of the pilot differ from bid/original plan  
*Probe: items in original bid/LA ToC*

## **Strategic Planning (30 minutes)**

---

Objective: Investigate LAs' experiences of implementing Strategic Planning activities and views about early effectiveness

- **Local Needs and Supply Assessments**

- Describe approach and process to needs and supply assessments
  - Resources used – were adequate resources sourced?
  - Actors / Partnerships Involved
  - Processes – process steps and who is responsible for each element
  - Specific activities completed
  - Any changes over time in approach / process / resources and why – how was this change managed. What have you been able to add / develop as a result of the pilot compared to what was happening before?
- Data sources used / needed Has local data collection improved / changed as a result of the pilot? In what way?
- Systems for recording information
- Barriers in conducting needs and supply assessments
- Overcoming barriers (incl. any innovation, partnership or enabling factors)
- Outcomes intended
  - *From ToC: Structural and cultural change is effected in LAs*
  - How these changes are attributable to the pilot, how outcomes are evidenced
- Effectiveness of Strategic Planning in meeting outcomes (*if ineffective, why?*)
  - **How (if at all) greater knowledge of supply and demand has affected ability to:**
    - **Manage supply**
    - **Plan to meet future need with good quality supply**
    - **Have better oversight over VfM**
  - Anything particularly proud of
  - Anything that could have gone better
- **Any other Strategic Planning activity**
  - **Hull:** Market Provider Development and Resident Improving Expectations documents (already covered)
  - Describe approach
    - Resources used – were adequate resources sourced?
    - Actors / Partnerships Involved
    - Processes – process steps and who is responsible for each element
    - Specific activities completed
    - Any changes over time in approach / process / resources and why – how was this change managed
  - Systems for recording information
  - Data collected
  - How data is monitored and used
  - Any barriers experienced and how overcome
  - Outcomes achieved/changes identified
    - *ToC: Structural and cultural change is effected in LAs*

- How these changes are attributable to the pilot, how outcomes are evidenced
- Effectiveness of Strategic Planning in meeting outcomes (*if ineffective, why?*)
  - Anything particularly proud of
  - Anything that could have gone better

## **Experiences of delivery (5-10 minutes)**

---

*IMPORTANT MODERATOR NOTE: It is envisaged that this section is most relevant to LA leads, but can touch on for other stakeholders if relevant*

- **Overall reflections and lessons learned**
  - Where have activities been effective in achieving outcomes so far and why
    - What are you most proud of from pilot activities (if at all)?
    - Any areas of best practice where other LAs could learn from them
  - Where have activities not been effective in achieving outcomes so far and why  
*Probe: any unintended negative impacts*
  - Whether outcomes are directly attributable to pilot (and its funding) or whether other factors have come into play
  - Would they do anything differently if they ran the pilot again and why
  - Key lessons learned *Spontaneous, then:*
    - Did they learn anything from other pilot areas
    - How will learnings be retained/built on after pilot ends

## **Perceived impacts (5 minutes)**

---

Objective: Gather information on the perceived impacts of each pilot

*IMPORTANT MODERATOR NOTE: It is envisaged that this section is most relevant to LA leads, but can touch on for other stakeholders if relevant*

*This section is based on impacts as in the Theory of Change but these may be subject to change based on other ongoing strands of fieldwork*

- What impacts observed  
*Probe if relevant:*
  - *Improved VfM in supported housing*
  - *Learning disseminated across LAs*
  - *Supported housing teams feel more confident and capable to challenge poor standards*

- *Standards of providers are improved and poor providers are deterred*
- *Outcomes improved for residents*
- *Structural and cultural change effected in LAs*
- How impacts have been monitored/tracked
- Have any groups of people been positively/negatively affected more than others?
- Any impacts they expected to see but have not, and why
- Any unexpected benefits or negative consequences
- Any data/resources to share with evaluation team

## Conclusion (2 minutes)

---

Objective: Gather key recommendations, summarise and close

- How far can the progress in your LA be replicated / inform other areas? (Or is much of this local specific, e.g. partnerships / nature of local housing / provider markets)
- Is there any other data that we aren't currently collecting that you think will demonstrate the impact of the pilot (or demonstrate why impact is limited?)
- **Ask to share documentation**
  - Will help us evidence the detail around your points e.g. aim to conduct X number of inspections
  - Helps bring the topic to life for us when we don't work on it day to day
  - Stored securely and protected in the same way as all the data we gather for this study
- **Any areas for further exploration**
- **Thanks and Close**

## Providers

# Background (15 minutes)

---

Objective: Understand participant's role and information about provider

- **Participant information**
  - Job title
  - Organisation
  - How long worked there
  - Responsibilities in role
- **Provider information**
  - Type of organisation – *e.g. charity, housing association, etc.*
  - Remit of organisation
    - Do they specialise in supported housing or are they more general housing provider
    - Any other specialisms – *e.g. care leavers, prison leavers, drug addicts*
  - When established
  - Size – *employees, housing portfolio*
  - Location(s) – *local/regional/national*
- **Supported Housing**
  - Reasons for being/becoming a supported housing provider
    - *Probe sensitively for motivations – financial or social benefit? Has the proposed changes to the funding model in 2018 changed their ways of working?*
  - How long have been a provider
  - What sort of accommodation provided/in their portfolio – *e.g. self-contained houses, flats, hostels, etc.*
  - Referral process
    - Sources of referrals
    - Types of residents referred to them
    - How decide who to accept
    - What works well / less well
  - What sort of support is provided to residents
    - How is this tailored to each individual
    - Processes they have in place to provide support
    - Staffing for support
    - Whether they track outcomes
  - How much are residents charged e.g. means-tested contributions
    - *If they are able, provide a breakdown of costs*

- *Rent*
- *Service charges*
- How much Housing Benefit they receive from local authority / DWP
  - How is this spent

## **Perspectives on Supported Housing Market (10 minutes)**

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- **Perspectives on supported housing market in local area**
  - Number of providers in local area (if known)
  - Nature of providers in local area – *e.g. large organisations, charities, businesses, mixture*
  - Supported housing challenges in local area – *e.g. oversupply, poor quality, misuse*
    - *Blackpool – old B&Bs being converted, large numbers of care leavers*
    - *Hull – surplus of student accommodation*
    - *Birmingham – surplus of student accommodation; large family homes that can be converted*
  - Local opportunities for providers
    - How to take advantage of opportunities
  - Local challenges for providers
  - Opinions about LA activity in local area
- **Perspectives on supported housing market nationally**
  - Opinions on whether any national regulations/schemes have had a positive/negative effect on supported housing provision
    - *Probe: (lack of) regulations, poor social care options meaning wrong people end up in supported accommodation*
  - National opportunities for providers
  - National challenges for providers
  - How to overcome challenges/how to prevent scrupulous providers/landlords from exploiting the system
  - Opinions about MHCLG / DWP policy
    - *Probe: National Statement of Expectations, activities to improve standards in sector*

## **Engagement in the Supported Housing Oversight Pilot (15-30 minutes)**

---

- How/when became aware of pilot
- How much they know about pilot aims
- Who they've had interactions with at LA



- Probe for engagement with pilot for each activity: *Identify through asking 'how have you been involved in the pilot?' then prove further if necessary*
  - Strategic Planning [gathering data and information about exempt/specified accommodation sector and using it for future planning]
  - Housing Benefit scrutiny
  - Housing inspections/enforcement activities
  - Care and Support Review Assessments
  - Other
- For each activity:
  - How/when they were contacted by the LA
  - How/when were they involved, what asked to do
  - Who involved and how – *e.g. provider, landlord, residents*
  - What, if any, info/data they were asked to provide – *e.g. data on residents, rent charges, etc.*
  - Any challenges
  - Had they been asked to do any of this before (*i.e. had they been asked to be inspected before or is it normal,*)
  - Any outcomes of involvement
    - Whether they've changed any of their activities/approaches to supported housing because of involvement in pilot  
*Probe: rents, service charges, housing quality, provision of support*
    - Any benefits/challenges
    - Whether LA kept in touch with updates/outcomes of their involvement
  - Feedback on each pilot activity
    - What went well
    - What went less well/what could be improved
    - Value of activity to them and perceived value to the LA
    - Any difference made to them

## Conclusion

(5 minutes)

Objective: Gather key recommendations, summarise and close

- **Any closing comments**
  - What's the most important thing we should take away from this discussion
- **Ask to share documentation**

- Will help us evidence the detail around the points you've raised to MHCLG and DWP
- Helps bring the topic to life for us when we don't work on it day to day
- Stored securely and protected in the same way as all the data we gather for this study
- **Any areas for further exploration**
- **Thanks and close**

## Case studies

### Participant Background (8 minutes)

---

Objective: Understand participant's role in Supported Housing Oversight Pilot

*IMPORTANT MODERATOR NOTE: Interviewer to highlight all activities mentioned on Local Authority activity summary to inform later discussion.*

- **Participant information**
  - Job title
  - [IF EXTERNAL] Organisation
  - Responsibilities in role (brief)
- **Involvement in the Supported Housing Oversight Pilot**
  - Confirm involvement in [EVALUATION AREA / RESPONSIBILITIES IDENTIFIED IN SAMPLE FILE]
  - Probe for detail on involvement in specific activities within this strand
    - Whether they have any responsibility for/knowledge of data collection
  - Involvement / cross-over with in any other strands of the Supported Housing Oversight Pilot
    - Strategic Planning
    - Housing Benefit / Inspections / Quality
    - Care and Support Review Assessments
    - Monitoring and Evaluation
    - Other
  - Other teams / actors / organisations worked with
  - Level of involvement
  - Frequency of involvement

### Case Study: Taking successful strong action against a poor-quality provider (30 minutes)

---

Objective: Gather information for a case study about taking successful action against poor quality provider, preferably an example with both accommodation and support addressed

- Case study background
  - Length of time provider established as exempt, nature of provider (e.g. charity, housing association, etc.)

- How identified as poor provider – *through pilot initiatives or through existing work, routine inspection, proactive inspection or reactive inspection after concern flagged*
- Why provider poor
  - Housing
  - Care and support
  - How assessed – *e.g. questionnaires, resident/provider interviews, comparing against framework or HB scrutiny flagged potential issues?*
- Action taken. *Spontaneous then probe steps taken, e.g. verbal request, the written letter, penalty notice, court summons, etc. What happened at each of these stages*
  - Any barriers – *e.g. staff resourcing, time taken, covid, fear of failure at tribunal (more than minimal)*
  - Any enablers – *e.g. cross-team working, innovative ways of collating information*
- Outcome of action
  - On residents – *e.g. moved to different accommodation, existing accommodation improved, support improved*
  - On provider – *e.g. HB removed, improved quality of accommodation and/or support*
  - On LA – *e.g. money saved, welfare of residents ensured*
  - Whether outcomes can be directly attributable to pilot or do any other factors come into play
  - Any negative outcomes – *e.g. money spent on legal action, lots of resource required to bring a case against provider*
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing
  - Implications for MHCLG policy
  - Implications for legislation

## **Case Study: Improvements to support (30 minutes)**

Objective: Explore how an individual's support has been improved (e.g. through resident support review, action taken against provider) – tracking their journey through LA services and outcomes)

**IMPORTANT MODERATOR NOTE: ANONYMITY OF INDIVIDUAL MUST BE PROTECTED – DO NOT USE REAL/FULL NAME**

- Individual background – *rough age, why they are in supported housing, what their support needs are, how long have they been in supported housing system, how long in particular provider accommodation, how much they/LA pays in rent/HB (if known)*
- How individual assessed when entered supporting housing – *needs identified, what was written on support plan*
- How poor support was identified - *through pilot initiatives or through existing work, routine check-up, proactive inspection, or reactive inspection after concern flagged*
- Action taken to improve support e.g. *resident support review, formal action against provider*
  - Pilot initiative or continuation of existing activities?
  - Steps taken as part of action – *e.g. resident interview, comparing support plan when entered accommodation vs what they're receiving, provider interview vs resident interview*
  - Any barriers – *e.g. bullying of resident by provider, covid*
  - Any enablers – *e.g. cross-team working, innovative ways of collating information*
- Outcome of action
  - **On residents– e.g. moved to different accommodation, support improved**
  - On provider – *e.g. HB removed, support improved*
  - On LA – *e.g. money saved, welfare of residents ensured*
  - Whether outcomes can be directly attributable to pilot or do any other factors come into play
  - Any negative outcomes – *e.g. money spent on legal action, lots of resource required to bring a case against provider*
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing
  - Implications for MHCLG policy
  - Implications for legislation

## **Case Study: Housing Benefit scrutiny (30 minutes)**

---

Objective: Explore how innovative working has succeeded or failed in challenging HB claims to ensure the claimant's landlord is satisfying the specified definition and/or the levels of rent/service charges being charged to the claimant by the landlord.

- Case study background
  - New provider or existing claim scrutiny (*if existing, what triggered scrutiny*)

- Innovative working
  - Description of ‘innovative working’ (*e.g. new methods/new team/working with other teams or team members/other*)
  - Whether this way of working was established as part of pilot or did it already exist
- How HB was scrutinised
  - What systems used to record/check/share information
  - What sources of info used (*e.g. LA records, data/records from provider/landlord*)
  - What was conclusion of scrutiny, how was this conclusion reached
    - *Care and support – how did they identify level of support, how they made decision it was inadequate, how did they judge this*
    - *Probe for decisions made around ‘poor provision’ and ‘more than minimal’*
- Action taken against provider
  - Steps taken as part of action – *e.g. informal/formal conversations with provider, provider taken to tribunal, etc.*
  - Any barriers – *e.g. covid, lack of regulation*
  - Any enablers – *e.g. cross-team working, innovative ways of collating information*
- Outcome of action
  - On residents– *e.g. moved to different accommodation, support improved*
  - On provider – *e.g. HB removed, support improved*
  - On LA – *e.g. money saved, welfare of residents ensured*
  - Whether outcomes can be directly attributable to pilot or do any other factors come into play
  - Any negative outcomes – *e.g. money spent on legal action, lots of resource required to bring a case against provider*
  - Was action a success/failure and why
    - Did pilot aid in success/failure
  - Would outcome have been different if ‘innovative working’ approach wasn’t used
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing
  - Implications for MHCLG policy
  - Implications for legislation

## Case Study: Managing new supply – Successes and challenges/limitations (30 minutes)

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Objective: Explore ways that LAs are managing new supply, and the successes and challenges around this

- Action taken with regard to managing supply – *e.g. gatekeeper scheme, challenging new applications – either based on local need or because proposed scheme/provider doesn't meet quality expectations*
  - Pilot initiative or continuation of existing activities?
  - Steps taken as part of action – *e.g. gathering data on supply and demand*
  - Any barriers – *e.g. covid, delays in receiving data/information*
  - Any enablers – *e.g. cross-team working*
- Outcome of action
  - On residents– *e.g. being placed into appropriate accommodation in a timely manner*
  - On provider – *e.g. refused claim, apply elsewhere*
  - On LA – *e.g. resource saved / spent*
  - On wider area/neighbourhoods – *e.g., some areas becoming saturated with SH, or a neighbourhood avoiding a poor-quality scheme setting up/ASB/etc*
  - Whether outcomes can be directly attributable to pilot or do any other factors come into play
  - Any negative outcomes – *e.g. disagreements between providers/landlords and residents*
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing
  - Implications for MHCLG policy
  - Implications for legislation

## Case Study: Approaches to establishing and interpreting 'more than minimal' (30 minutes)

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Objective: Explore innovative/best practice ways of establishing a definition of 'more than minimal'

- How 'more than minimal' was assessed before pilot
- Describe 'innovative' approach to establishing and interpreting more than minimal
  - Whether approach was part of pilot or pre-existing measure
  - How 'more than minimal' is defined
    - Use of existing case law/legislation (if applicable) – *e.g. Hull using barrister to look through case law?*
  - Who involved – *internal/external partnerships, whether partnerships were new as part of pilot or existing*
  - Data collected – *primary and secondary, e.g. speaking to providers/landlord/residents, comparing initial support reviews with support received now*
- Outcome of action
  - On residents– *e.g. moved to different accommodation, support improved*
  - On provider – *e.g. HB removed, support improved*
  - On LA – *e.g. money saved, welfare of residents ensured*
  - Whether outcomes can be directly attributable to pilot or do any other factors come into play
  - Any negative outcomes – *e.g. time/money spent on activities*
  - Was action a success/failure and why
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing
  - Implications for MHCLG policy
  - Implications for legislation

## **Case Study: Impact of Resident Voice (30 minutes)**

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Objective: Explore best practice examples of using resident voice to improve supported housing

- Action taken with regard to resident voice – *e.g. Charter of Rights*
  - Pilot initiative or continuation of existing activities?
  - Steps taken as part of action – *e.g. creating charter, facilitating dialogue between residents/providers/LA*
  - Any barriers – *e.g. covid, keeping contact with residents*
  - Any enablers – *e.g. cross-team working, enthusiasm of residents*
- Outcome of action



- On residents– *e.g. feeling of empowerment, support improved*
- On provider – *e.g. steps taken to improve support, improved dialogue with residents*
- On LA – *e.g. welfare of residents ensured*
- Whether outcomes can be directly attributable to pilot or do any other factors come into play
- Any negative outcomes – *e.g. disagreements between providers/landlords and residents*
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing
  - Implications for MHCLG policy
  - Implications for legislation

## **Case Study: Implementing innovative activities – a set of ‘mini’ case studies (30 minutes)**

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Objective: Explore individual initiatives from local authorities to improve supported housing

- Action taken with regard to innovative activities
  - Pilot initiative or continuation of existing activities?
  - Steps taken as part of action –
  - Any barriers – *e.g. covid*
  - Any enablers – *e.g. cross-team working*
- Outcome of action
  - On residents– *e.g. support improved*
  - On provider – *e.g. steps taken to improve support/quality of housing*
  - On LA – *e.g. welfare of residents ensured, money saves*
  - Whether outcomes can be directly attributable to pilot or do any other factors come into play
  - Any negative outcomes – *e.g. time/money spent*
- Any longer-term outcomes / impacts anticipated
- Learnings and implications
  - Summarise what worked well
  - Summarise what worked less well
  - Practical recommendations for other LAs trying to do the same thing

- Implications for MHCLG policy
- Implications for legislation

## **Progress review (5 minutes)**

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Objective: Confirm pilot objectives and explore any changes to pilot since phase 1

### *IMPORTANT MODERATOR NOTE: ONLY ASK IF AHEAD OF TIME*

*Each individual pilot area has their own objectives but they should tie in with overall MHCLG objectives. LAs objectives won't perfectly match and some areas might emphasise some objectives more than others. Overall MHCLG pilot objectives are:*

- p) Improving the quality of accommodation and support in short-term supported housing;*
  - q) Improving value for money in supported housing and better oversight of Housing Benefit claims;*
  - r) Testing the effectiveness of LA interventions to drive up quality and improve value for money that could be more widely adopted;*
  - s) Testing whether existing LA enforcement powers are sufficient to address poor quality, and understanding barriers to enforcement;*
  - t) Testing approaches to data collection and ensuring a better picture of local supply (what provision exists in each area) and local demand*
- **Understanding of strategic objectives, outputs and outcomes**
    - Desired outcomes from the activities / strands they have identified as being involved in
    - Desired outcomes from / aims of the pilot as a whole
    - How outcomes are being measured/recorded
    - Have there been any changes/developments to the objectives through the course of the project?
      - If yes, what changed and why?
    - Have there been any changes/developments to team structures or partnerships?
      - If yes, what changed and why?
    - Have there been any changes/developments to who is doing what?
      - If yes, what changed and why?
  - **Overview of progress**

- What activities have been undertaken and what have been the outcomes/impacts
- Any activities that have not been completed and why
- How does the actual implementation of the pilot differ from bid/original plan  
*Probe: items in original bid/LA ToC*

## Perceived impacts

(10 minutes)

Objective: Gather information on the perceived impacts of each pilot

*IMPORTANT MODERATOR NOTE: It is envisaged that this section is most relevant to LA leads, but can touch on for other stakeholders if relevant*

- What outcomes observed  
*Probe (if not mentioned already):*
  - *Improved VfM in supported housing*
  - *Learning disseminated across LAs*
  - *Supported housing teams feel more confident and capable to challenge poor standards*
  - *Standards of providers are improved and poor providers are deterred*
  - *Outcomes improved for residents*
  - *Structural and cultural change effected in LAs*
- How outcomes have been monitored/tracked
- Have any groups of people been positively/negatively affected more than others (e.g., DA survivors?)
- Any outcomes/impacts they expected to see but have not, and why
- Any unexpected benefits or negative consequences
- Any data/resources to share with evaluation team

## Conclusion

(10 minutes)

Objective: Gather key recommendations, summarise and close

- **Overall reflections and lessons learned**
  - Experience of delivery
  - Where have activities been effective in achieving outcomes so far and why  
*Probe: quality of accommodation and support, improving VfM and oversight of HB claims*
    - What are you most proud of from pilot activities (if at all)?
    - Any areas of best practice where other LAs could learn from them
  - Where have activities not been effective in achieving outcomes so far and why

*Probe: any unintended negative impacts (managing supply)*

- Whether outcomes are directly attributable to pilot (and its funding) or whether other factors have come into play
- Would they do anything differently if they ran the pilot again and why
- Key lessons learned *Spontaneous, then:*
  - Did they learn anything from other pilot areas
  - How will learnings be retained/built on after pilot ends

- **Any closing comments**

- What's the most important thing we should take away from this discussion
- How far can the progress in your LA be replicated / inform other areas? (Or is much of this local specific, e.g. partnerships / nature of local housing / provider markets)
- Is there any other data that we aren't currently collecting that you think will demonstrate the impact of the pilot (or demonstrate why impact is limited?)

- **Ask to share documentation**

- Will help us evidence the detail around your points e.g. aim to conduct X number of inspections
- Helps bring the topic to life for us when we don't work on it day to day
- Stored securely and protected in the same way as all the data we gather for this study

- **Any areas for further exploration**

- **Thanks and close**

### 13.2.5 Housing Benefit Workshops guide

## Introductions and Data Privacy

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- Moderator Introduction
- Introduce Kantar Public
- Aim of the discussion:
  - Conducting research on behalf of the Ministry for Housing, Communities and Local Government (MHCLG) and Department for Work and Pensions (DWP)
  - Looking to understand in greater depth experiences and views on Housing Benefit and its use in relation to supported housing
- Focus group Management:
  - All views are welcome – if your thoughts differ from others please do speak up, we are interested in understanding the full spectrum of experiences. At the same time, please be respectful of the opinions of others.
  - Online etiquette: If you'd like to speak, please raise your hand and the focus group moderator will call on you to speak. You may also post messages or questions in the online chat-box.
- Focus group length: 2 hours
- Data privacy:
  - Research is confidential and voluntary – your personal details will not be shared with MHCLG or DWP.
  - All responses will be reported anonymously and on aggregate with others.
  - Findings of these groups will be integrated into the overall evaluation findings.
- Privacy policy:
  - <https://www.kantar.com/uki/surveys>
- Recording consent:
  - Ask for permission to audio record and confirm consent.
- Opportunity for questions.

## Warm up

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We know most of you will be familiar with us and others in the room, but just to get started and for the sake of the recording, please introduce yourself to the group and tell us:

- Name
- Role
- Local Authority
- Favourite meal / fun fact

## The Housing Benefit Lifecycle

(20 minutes)

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Objective: Warm up participants; identify commonalities and divergencies between LAs; *set up framework for discussion*

### **Outlining the process of receiving a HB claim** [Task 1: Scenario – STIM]

Here we have outlined some of the steps of receiving a Housing Benefit Claim for specified accommodation, and scrutinising that claim.

[IN BREAKOUT GROUPS] - Take a look at the diagram on the screen – does this reflect the broad process in your local authority. If not, why not? How is it the same/different?

#### **Key probes:**

- Anything missing from this diagram that is integral or helpful to HB scrutiny for your LA; what this is and where would it normally sit.
- Differences in this process depending on whether the provider is known or new.
- Impact of the pilot on this overall process/ decision-making (note, we will explore each step in more detail next).

### **Receiving Housing Benefit Claim**

Let's discuss the first step in greater detail.

#### **Key probes:**

- Process of being notified of a Housing Benefit Claim
- Identifying that the Housing Benefit claim is for specified accommodation
- Other circumstances / factors that might trigger HB scrutiny.
- Impact of the pilot on dealing with claims from new providers, impact of 'joined up working' on dealing with new claims.
- How much impact can the pilot have on this process?
- How data systems are used to record, check and share information and to flag specified accommodation.

## **Break**

**(5 minutes)**

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Impact of the pilot on dealing with claims from new providers, impact of 'joined up working' on dealing with new claims.

# Understanding Housing Benefit Criteria and Poor Provision

(40 minutes)

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Objective: Understand LA knowledge and interpretation of Housing Benefit criteria with regards to supported housing; Explore how LAs identify 'poor provision' in supported housing.

## **Investigating eligibility of a provider** [Brainstorm and notes – POTENTIAL BREAKOUT GROUPS, CHANGE PROBES INTO SORTING EXC.]

- How do you determine whether a provider is eligible?
- How do you determine which category of specified accommodation a claim is for?
- What difference does the outcome of this decision (about the category of specified accommodation) have on the rest of the process? Does this change the ability/power to restrict rents?

### **Key probes:**

- What are the challenges or grey areas here?
- Have you changed these processes as a result of the pilot?
  - What impact has this had? (e.g. any providers found ineligible, fall-out of that – provision closed, de-classified, people moved, appeals?)
    - If limited impact, why is that?
- When are claims recategorized?
  - Why and effect on the process

## **Care, support and supervision provision** [Brainstorm and notes]

- How do you identify whether the landlord or someone acting on their behalf is providing care, support or supervision?
- How do you decide whether enough care and support is being provided to justify specified status? How is 'more than minimal' defined/measured?
- How do you decide whether or not the claimant actually needs the care, support or supervision?
- How often/ under what circumstances do you review these decisions?

### **Key probes:**

- Is this different where you do or do not know the scheme/ provider already? Do you most commonly see issues/ineligible claims for a specific cohort or type of support?
- What are the challenges or grey areas here?
- Have you changed the way you do this as a result of the pilot?

- What impact has this had (unpick how, why/ not, what's been most effective?)
- Where are the limitations of the additional resources available in the pilot?

## **Understanding Value for Money (20 minutes)**

Objective: Explore how LAs define 'value for money' and 'cost effectiveness' when it comes to Housing Benefit and supported housing.

### **Understanding Value for Money** [Task 2: Breakout rooms – STIM]

In small breakout rooms, discuss what 'value for money' means to you in the local authority when it comes to Housing Benefit for supported housing. We've put some discussion points for you on the slide, take a look at these and we will ask each group to feedback after 10 minutes.

Call on breakout rooms to feedback on these two points.

#### **Key probes:**

We'd like to ask you more about the impact of subsidy rules. In case you weren't aware, subsidy rules mean that LA can typically claim back 100% of the HB awards for exempt accommodation made to Registered Providers, where otherwise they lose 40-60% of this subsidy.

- What impact do these rules have on the assessment of Value for Money?
- What (if any) impact has the pilot had on the 'Value for Money' of supported accommodation for your local authority? Why?

#### **Costs** [Brainstorm and notes]

- When and how do you scrutinise service charges for eligibility/ ineligibility? When and how do you scrutinise service charges for reasonableness/ VFM?

#### **Key probes:**

- What are the challenges or grey areas here?
- Have you changed the way you do this as a result of the pilot?
- What impact has this had? (unpick how, why/ not)
- What are the limitations of the additional resources available in the pilot?
- What triggers a referral to the Rent Officer?



### Key probes:

- What are the challenges or grey areas here?
- How does the status of the organisation and the type of scheme (Registered Provider vs. Non-Registered) impact on this process in practice?
- Have you changed the way you do this as a result of the pilot?
  - What impact has this had? (unpick how, why/ not)
- Where are the limitations of the additional resources available in the pilot?

## Break (5 minutes)

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### Drivers of Cost and Quality (15 minutes)

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Objective: Identify and explore the factors that LAs believe drive cost and quality in supported housing.

#### **Drivers of quality** [Brainstorm and notes – POTENTIAL BREAKOUT ROOMS W MARKUP]

- How is 'poor' supported housing provision identified in your LA? What role does the HB team play in that?
- What happens when poor provision is identified? What role does the HB team play in that?

#### Key probes:

- Has the pilot changed the HB's role in this?
- Which factors drive high quality, and which are most important.
- Expected impact of pilot on the quality of accommodation and support.

#### **Drivers of cost** [Brainstorm and notes]

- What factors drive high costs for supported accommodation?

#### Key probes:

- Which factors are most influential.
- Expected impact of the pilot on reducing costs of accommodation and support.

## Conclusion and thanks (10 minutes)

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Objective: To close the focus group and provide final opportunity for questions.

## **Thanks and Goodbye**

- Thank participants.
- Opportunity for final questions.
- Opportunity for feedback on the session.