

Homelessness and Housing Solutions Service
Directorate Neighbourhoods

**Evidence Base - Homelessness Prevention and Rough
Sleeping Strategy**

2020-2025

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Introduction

We have adopted a broad approach to the ‘evidence-base’ for the draft homelessness prevention and rough sleeper strategy. It comprises ‘information to inform decision-making’¹.

The next section, therefore, centres on a summary of national policy and research including the impact of covid-19 on strategies for homelessness and rough sleeping. This is followed by a review of our existing local homelessness policy. The penultimate section (and appendices A & B) is the core element of the evidence-base. It covers an analysis of data and the outcome of interviews with stakeholders carried out by Housing Quality Network (HQN) in autumn 2019 (see appendix C), which wherever possible has been updated. The final section summarises the key findings in the draft evidence-base for the local housing strategy produced also by HQN in 2020. This provides a broader context covering, for example, the operation of the housing market and the state of play on affordable housing.

National policy and research

1.1. Introduction

This section focuses on five topics:

- Legislative background for local homelessness strategies
- Government’s rough sleeping strategy
- Impact of covid-19
- Post-covid-19
- Other policy and research.

The latter briefly summarises relevant key findings and reports by think tanks and research organisations.

In broad terms, this section covers (i) substantive policies and (ii) guidance on producing local homelessness and rough sleeping strategies.

It is important that we and our local stakeholders appreciate the challenges and opportunities of the changing national policy environment. This is illustrated in the figure below:

¹ This approach has also been adopted for the evidence-base for our local housing strategy.

Figure One: Legislative and Policy Framework



1.2. *Legislative background*

There is a statutory requirement for local authorities to produce a local homelessness strategy². The Homelessness Act, 2002 introduced this requirement. It should review the nature and scale of homelessness and adopt a strategy to tackle identified problems (including an action plan and spending priorities). The associated Code of Guidance provides detailed advice to local authorities³.

The five key principles, some of which remain relevant, are that strategies should:

- Identify the scale and nature of homelessness
- Take steps to tackle homelessness
- Adopt a multi-agency perspective
- Keep strategies under review
- Publish new / revised strategies, at least, every five years

1.3. *Rough sleeping strategy*

The Government's rough sleeping strategy (August 2018)⁴ covers policies and their implementation as well as guidance of the preparation of strategies.

² There is no mandatory requirement to prepare a local housing strategy.

³ MHCLG (2018) *Homelessness Code of Guidance for Local Authorities*, London, MHCLG, 12 April 2018 Version

⁴ See <https://www.gov.uk/government/publications/the-rough-sleeping-strategy>

In relation to *policies*, there are two key commitments:

- Halve rough sleeping by 2022
- End rough sleeping by 2027.

These commitments centre on ‘supporting every person who sleeps rough off the streets and into a home’ (p8 of the rough sleeping strategy). Over £100 million of funding has been made available for the first two years of the policy.

The focus is threefold – (i) prevention, (ii) intervention and (iii) recovery. This is illustrated in the table below:

Table One: Threefold Vision for Ending Rough Sleeping

Vision	Definition	Examples
Prevention	Preventing rough sleeping and homelessness happening in the first place	Homelessness Reduction Act, 2017: Prevention responsibilities for local authorities
Intervention	Supporting people who are rough sleeping by providing emergency accommodation and advice / help	Provision of hostel and night shelter accommodation accessed through the help of homelessness support workers
Recovery	Ensuring affordable and secure accommodation	Housing first initiative: Securing safe and permanent accommodation as a first priority

The rough sleeping strategy also included proposals in chapter three (paragraphs 71-73) to guide the *preparation of local strategies*:

- Ministry of Housing, Communities and Local Government (MHCLG) will work with local authorities so that there are updated strategies in place
- Strategies should be rebranded as homelessness and rough sleeping strategies
- Local authorities should regularly report on progress in delivering their strategies
- Annual action plans should be produced
- Strategies should be available online and submitted to MHCLG and
- Consultation will take place with national and local stakeholders on the use of local homelessness reduction boards.

The government’s rough sleeping strategy also included a commitment in chapter three paragraphs 68-70 that a review will be undertaken on the homelessness reduction legislation / guidance. Tamworth Borough Council is involved in this review as a member of the MHCLG Task Force.

The timeline for preparing homelessness and rough sleeping strategies has been flexible. It has, however, become clear that the covid-19 pandemic has created challenges. A sample survey of a small sample of district councils in the Midlands by HQN in August 2020 found that:

- Preparation of strategies and the implementation of action plans have generally been put on hold
- Newly produced strategies (in 2019/20) require reviewing
- Completing and updating strategies are, in some cases, being postponed pending guidance from MHCLG.

1.4. *Post-2018 policy developments*

The Conservative Party election manifesto in autumn 2019 included a commitment to end rough sleeping by 2025. This has yet to become national policy.

As a result of the covid-19 pandemic (and see section 2.5.), the national lockdown involved council's being required in March 2020 to end rough sleeping at short notice by providing temporary accommodation. This initiative is referred to as the 'everyone in' programme. This has been followed by the 'next steps' programme in summer 2020 to continue to provide temporary accommodation and to develop long-term housing options.

We are assuming that there will be a further policy announcement in autumn 2020 to clarify the current position on rough sleeping targets, as well as guidance on homelessness and rough sleeping strategies.

1.5. *Impact of covid-19*

This sub-section focuses on the strategic implications of covid-19 for homelessness prevention and rough sleeping policies. It, therefore, does not focus on the detailed guidance provided by the Government. The response by the Council and its partners to the impact of covid-19 on rough sleeping in Tamworth is discussed in section three.

As has already been pointed out, there are two primary relevant national policies for rough sleeping – (i) 'everyone in' initiative and (ii) the 'next steps' accommodation proposal. An overview of guidance was provided by the Minister for Rough Sleeping and Housing on 28 May 2020⁵. In addition, the Government has issued a series of statements that have implications for homelessness and rough sleeping.

The '*everyone in*' programme was announced in March 2020⁶. The aim has been to provide safe temporary accommodation with initial funding of £3.2 million to local authorities. Councils have been required to provide a move-on accommodation plan

⁵ See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892797/Letter_from_Luke_Hall_MP_Minister_for_Rough_Sleeping_and_Housing_to_LA_Chief_Execs.pdf

⁶ See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876466/Letter_from_Minister_Hall_to_Local_Authorities.pdf

for those in this programme by 11 June 2020. This included consideration of three options – encouraging people, wherever possible, to return to friends and family, providing sustainable move-on accommodation (eg housing associations and the private rented sector) and delivering temporary accommodation where sustainable housing is not an option.

In total, the Government has indicated that up to 15,000 households have been helped including rough sleepers living on the streets, people sharing night shelter accommodation and people vulnerable to rough sleeping. It is also estimated that over 5,400 known rough sleepers have been helped into hotels, hostels and other emergency accommodation. This equates to approximately 90 per cent of all rough sleepers.

Independent analysis for Crisis⁷ highlights that covid-19 prompted a radical and rapid shift in policy that was successfully implemented by councils and their partners through the ‘everyone in’ programme. Major findings include:

- Relatively low level of infections among people and households accommodated through the programme
- Eliminating the use of communal shelters and, wherever possible, dormitory provision
- Challenges for councils in responding to the immediate crisis while maintaining homelessness prevention activities.

The ‘next steps’ accommodation programme was launched on 18 July 2020⁸. Funding of £266 million has been available to councils to (i) continue to provide safe accommodation for vulnerable people including rough sleepers and (ii) help people into long-term housing. £105 million was targeted at Councils to safeguard temporary accommodation (initially funded through the ‘everyone in’ initiative). A further £161 million is aimed at delivering up to 3,300 units of long-term move-on accommodation. Bidding for these funds ran until 20 August 2020 to cover property costs and new tenancies. This is part of a larger programme to provide 6,000 long-term safe homes for vulnerable people.

In addition to these two initiatives, national policies have targeted vulnerable people including those potentially faced with homelessness. For instance, there has been the reopening of funding bids for the domestic abuse safe accommodation programme⁹. As is pointed out in section four, this is a significant immediate reason for homelessness.

⁷ Crisis (2020) *Homeless Monitor England 2020: Covid-19 Crisis Response Briefing*, London, Crisis – see <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/homelessness-monitor/england/homelessness-monitor-england-2020-covid-19-crisis-response-briefing/>

⁸ <https://www.gov.uk/government/news/jenrick-launches-266-million-housing-fund-for-vulnerable-people>

⁹ <https://www.gov.uk/government/publications/domestic-abuse-safe-accommodation-covid-19-emergency-support-fund>

In relation to the private rented sector, a temporary ban on eviction proceedings was extended until 23 August 2020 and then extended again until 20 September 2020. In addition, landlords should provide tenants with six months' notice, excluding serious cases such as anti-social behaviour and domestic abuse. When courts do resume eviction hearings, priority should be given to the most serious cases. Again, section four shows that the loss of a private rented tenancy is the major immediate reason for homelessness.

1.6. Post-covid-19

Inevitably, there is a degree of speculation as to national policy on tackling homelessness and rough sleeping post-covid-19. Local lockdowns, surges and future waves of the pandemic are likely to result in further temporary measures.

The medium-term policy trajectory will be influenced by the outcomes of (i) MHCLG task force on supporting private sector tenants and landlords and (ii) the Government task force on rough sleeping. The latter includes the forthcoming publication of research into the causes of rough sleeping.

Nevertheless, there are indications of the direction of travel:

- A Renters' Reform Bill will be introduced once the covid-19 emergency has subsided and it will focus on providing greater security of tenure while, at the same time, enhancing the rights of landlords. One of the objectives will be to reduce the loss of a tenancy as a major immediate reason for homelessness.
- A Domestic Abuse Bill is proceeding through Parliament and will reinforce the powers of councils to support victims and provide safe accommodation
- The forthcoming Social Housing White Paper is likely to highlight the role of social housing in providing good quality affordable rented housing for households threatened with homelessness.

1.7. Other policy and research

This sub-section focuses on the two major independent research centres on tackling homelessness. These are the UK Collaborative Centre for Housing Evidence (CaCHE) and the Centre for Homelessness Impact (CHI).

A useful policy framework has been developed by CaCHE¹⁰. It comprises five elements:

- Universal prevention to prevent or minimise risks across the population as a whole
- Targeted activities focussing on high risk groups

¹⁰ Fitzpatrick, S. et al (2019) *Homelessness Prevention in the UK – Policy Briefing*, Glasgow, CaCHE - <https://housingevidence.ac.uk/publications/homelessness-prevention-in-the-uk/>

- Crisis prevention ie preventing homelessness which is likely to occur within 56 days
- Emergency services for those who are homeless or rough sleeping and / or at immediate risk and
- Recovery prevention ie tackling repeat or revolving door homelessness.

The table below illustrates its potential application in terms of homelessness and rough sleeping policies.

Table Two: Policy Framework Elements

Elements	Examples of Policies	Links with Other Strategies & Organisations
Universal prevention	Provision of affordable housing Maximising welfare benefits	Local housing strategy DWP
Targeted activities eg multiple exclusion homelessness	Working with care leavers, prisoners etc Tackling substance misuse Addressing street culture activities Housing first initiative	Childrens services, probation service etc Drug and alcohol strategies Community safety partnership plan
Crisis prevention	Allocations and prioritising homelessness	Allocations policy
Emergency services	Night shelter accommodation Multi-agency services hub	Third sector organisations All public sector and voluntary agencies
Recovery prevention	Ongoing one-to-one support through housing first and a multi-agency services hub	Co-ordinated public and third sector activities

We are using this framework in our homeless prevention and rough sleeping strategy.

CHI was set up by the Government in 2018 as the ‘what works centre for tackling homelessness’¹¹. It is working with the Office for National Statistics to improve the adequacy and quality of homelessness and rough sleeping data (see below), as there is a consensus that it currently is not fit for purpose.

¹¹ <https://whatworks.blog.gov.uk/2019/10/11/what-works-in-tackling-homelessness/>

The major initiative relevant for councils, such as ourselves, is a six-month online project to end homelessness through the use of data and evidence. Up to 30 local authorities will be invited to participate¹². This project links to the CHI workstream on 'using evidence to end homelessness'¹³.

Review of the existing strategy and policies

1.8. Introduction

This section covers our performance on (i) the existing strategy and (ii) the policies that we have adopted to address the impact of covid-19 on rough sleeping. This section should be read in conjunction with section four on 'local information on homelessness and rough sleeping' and appendices A and B.

Overall, as the data and information in sections 3.3. and 4.3. as well as appendices A and B show, we and our partners have achieved a highly satisfactory performance, especially compared with national trends. A significant reason for this is the existing local policy and its implementation.

Our positive performance is further highlighted in feedback from partners. The Government's homelessness and support advisers (HAST) have commented that in relation to rough sleeping, the 'Tamworth position is well managed'. The interviews undertaken with local stakeholders by HQN in autumn 2019 highlighted the effective cooperation at an operational level with one organisation commenting that 'joint working with Tamworth Council delivers a good service for people threatened with homelessness'.

1.9. Existing strategy

There are three elements to the review of the existing strategy:

- Our performance
- Progress on the existing action plan
- Analysis of the spending plan in the existing strategy.

These are now discussed in turn.

As has already been pointed out, our performance has been positive. Using data and analysis from section four (and appendices A and B), there are four key points:

¹² See <https://www.homelessnessimpact.org/post/local-authorities-invited-to-join-community-committed-to-ending-homelessness-with-data-and-evidence>

¹³ See, for example, <https://www.homelessnessimpact.org/post/using-evidence-to-end-homelessness-available-now>

- Little use of temporary accommodation (especially bed and breakfast provision) compared to England as a whole – this reflects the emphasis in the strategy of providing suitable and sustainable accommodation
- Low numbers of repeat homelessness cases that shows the successful impact of our relief activities
- Relatively few rough sleepers with little evidence in the data on repeat cases, so demonstrating our collaborative work with partners (which was highlighted as a major feature of the strategy)
- Homelessness acceptance rates up to 2017/18 are in line with national rates – this shows that we have managed the homelessness crisis adequately.

During the existing strategy period, there have been significant changes in national policy (see figure one in section two). The most significant of these is the focus on prevention through the homelessness reduction legislation and guidance. We have made significant progress on reorganising our services to facilitate a stronger preventative focus. However, the data in section 4.4. shows that further work is required.

- To see progress on the existing action plan please see **appendix D**

1.10. Policies to address the impact of covid-19 on rough sleeping

Sections 2.4.- 2.6. of this report summarised national policy. It also highlighted that local authorities should produce an accommodation move-on plan by 11 June 2020. The data and information underpinning this plan demonstrates our successful performance in addressing rough sleeping since 2019 and tackling the impact of covid-19 between March and June 2020.

The key points on the scale and nature of rough sleeping are:

- Numbers are low with 16 people included in the ‘everyone in’ programme between late March and early June 2020, while the rough sleeper count in November 2019 found that there were only five rough sleepers
- The issue is one of transience linked to periods of temporary rather than entrenched rough sleeping.
- The immediate reasons for rough sleeping mirror those for homelessness (see section 4.5.)
 - Asked to leave by a family (5 in 2019 and 8 in 2020) / friends being unwilling to continue to provide accommodation (5 in 2019 and 4 in 2020)
 - Loss of private rented accommodation¹⁴ (4 in 2019 and 3 in 2020)
 - Relationship breakdown (4 in 2019 and 3 in 2020)
 - Fleeing domestic abuse (1 in 2019 and 4 in 2020).

¹⁴ Defined as the use of a section 21 notice by a landlord

The 'everyone in' programme has, so far, provided accommodation for 16 people comprising bed and breakfast (three people), council temporary provision (five people) and settled accommodation (eight people). Of these 16 people, only four would have been supported on mandatory grounds. The remaining 12 people have been helped on a discretionary basis. This demonstrates our commitment and success on the 'everyone in' programme.

Our performance mirrors the findings of the analysis for Crisis on the response to covid-19 (see section 2.5. and footnote 7). Councils and their partners have responded effectively. No use has been made of communal accommodation and there have been no significant issues over infection rates (according to the Directorate of Public Health at Staffordshire County Council).

An informal update by HQN in 2020 of a sample of district councils in the Midlands found that our performance is similar to other local authorities. Key points include relatively low numbers, helping both mandatory and discretionary cases and the use of a range of accommodation types. Our ability to provide council temporary accommodation and settled provision, nevertheless, stands out as significant compared to some other district councils. A further important finding is concern by all of the local authorities over access to national funding programmes because of low numbers and successful performance. We have also highlighted this as a challenge in our move-on plan.

Our SWOT (strengths, weaknesses, threats and opportunities) analysis that has been undertaken as part of our move-on plan shows that we are not complacent. The summary analysis is as follows:

Table Three: SWOT Analysis Summary

<p><i>Strengths</i></p> <ul style="list-style-type: none"> • < five rough sleepers in Tamworth • Transient not entrenched • Excellent relationships with partners • Strong organisational structure focused on prevention; partnerships and sustainable solutions • Significant range of housing solutions • Strong programme of affordable housing development including acquisitions • Low bed and breakfast usage with considerable savings to our general fund over last 2 years. 	<p><i>Weaknesses</i></p> <ul style="list-style-type: none"> • Unmet housing need • Gaps in specialist provision • Performance strong that inevitably limits external funding opportunities.
<p><i>Opportunities</i></p> <ul style="list-style-type: none"> • Housing revenue account investment in more affordable housing • Refreshed evidence-base to inform strategy and commissioning of services • Homelessness & Rough Sleeping Strategy 2020-2025 planned • Innovative approaches to meeting housing need that are recognised nationally. 	<p><i>Threats</i></p> <ul style="list-style-type: none"> • Impact of wider health determinants • COVID19 “everybody in” and wider application of statutory discretion • Stakeholder expectations • Private sector landlords and realism around shared accommodation for under 35-year olds • Poverty / low incomes and impact on affordability of accommodation • Cross-border placements eg Birmingham.

4. Local information on homelessness and rough sleeping

4.1. Introduction

This section focuses on the scale and nature of homelessness and rough sleeping in Tamworth. It covers (i) the trends on homelessness and rough sleeping and (ii) the reasons for homelessness and rough sleeping.

It is based on data analysis together with interviews with stakeholders, both undertaken by HQN in autumn 2019. The data analysis has been added to by an update by HQN in August 2020.

This section comprises:

- Brief review of the complex issues with national homelessness and rough sleeping data
- Data analysis summary (autumn 2019) and see appendix A for a more detailed review
- Data analysis summary (August 2020) and see appendix B for a more detailed review

- Analysis of the reasons for homelessness and rough sleeping.

4.2. National data on homelessness and rough sleeping

Statistics on homelessness are published by the MHCLG. Until 2018/19, quarterly releases centred on households accepted as being owed a statutory duty and numbers in temporary accommodation. These were based primarily on what were referred to as P1E returns¹⁵ made by local authorities to the government. Since April 2018, the government has adopted a revised approach. This reflects the new duties under the Homelessness Reduction Act, 2017, and a different system for collecting data. The latter is the 'homelessness case level information collection' (H-CLIC) system. This data is classified as 'experimental' because of quality issues¹⁶. Because of these issues and the lack of sufficient time-series statistics, it was not possible to draw any conclusions on the post-April 2018 data in the analysis undertaken by HQN in autumn 2019.

However, in mid-August 2020, MHCLG published the delayed homelessness statistics for the final quarter of 2019/20 as well as revised data for previous quarters. These revisions were, in some cases, substantial and we understand that further revisions and updates are likely. HQN has, nevertheless, produced an additional analysis based on this data release on 20 August 2020 covering 2018/19 and 2019/20. It, however, must be borne in mind that the raw MHCLG data is 'work in progress'.

HQN's survey of ten district councils in the Midlands in autumn 2019 suggest that data evidence-bases for homelessness and rough sleeping strategies draw, in the majority of cases, on pre-2018/19 official statistics ie P1E returns. Respondents commented that this data source allows long term comparisons between an individual council and national trends. HQN, therefore, adopted this approach in autumn 2019.

In the case of rough sleeping, the MHCLG publishes annual statistics which estimate the number of rough sleepers in a local authority area on a given night each autumn. There is a national consensus among organisations (eg CaCHE, CHI, Crisis and Shelter) that this is a less than satisfactory approach.

Unsurprisingly, therefore, there are attempts being made to improve data (see section two). For example, the Office for National Statistics (ONS) and the Centre for Homelessness Impact (CHI) have consulted on creating an indicator framework to measure progress on eliminating homelessness¹⁷.

¹⁵ See <https://www.gov.uk/guidance/homelessness-data-notes-and-definitions>

¹⁶ These issues include non-returns by a small number of councils and different interpretations of the requirements. This has been compounded by frequent modifications to the H-CLIC system. The authors of this paper have been informed that there have been 16 changes over the last 18 months.

¹⁷ See <https://consultations.ons.gov.uk/policy-evidence-and-analysis-team/homelessness-indicators-consultation/>

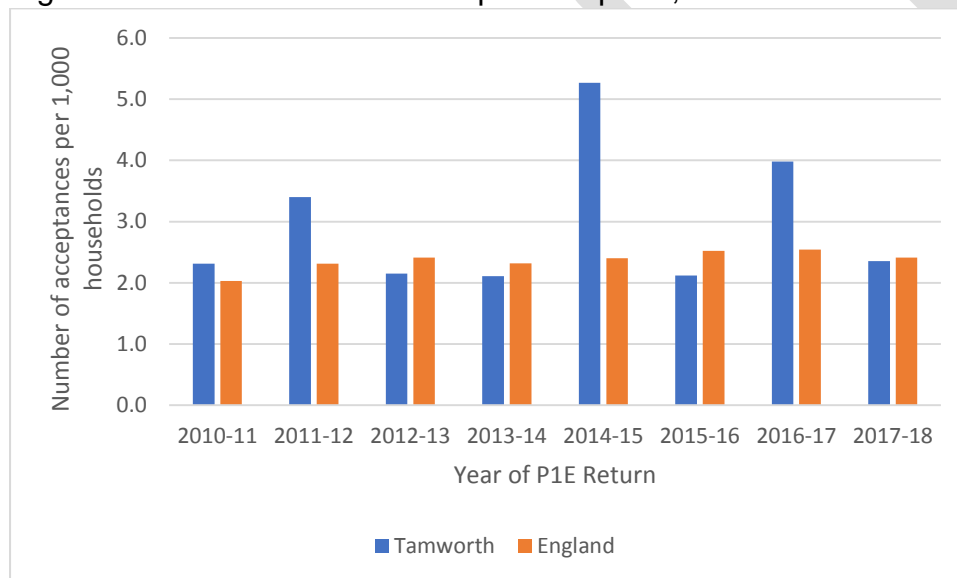
We will maintain a watching brief on these types of initiatives, so that we can better understand, for instance, the scale of sofa-surfing among young people (16-25 years old). This issue was flagged up in the interviews carried out by HQN in autumn 2019.

4.3. Analysis of data for Tamworth (autumn 2019)

In contrast to the trends in national data, between 2010 and 2018, local statistics generally reflect an improving or constant picture. This applies, for example, to number of households in temporary accommodation. The number of rough sleepers follows a similar pattern. Homelessness acceptances show a similar picture to national figures.

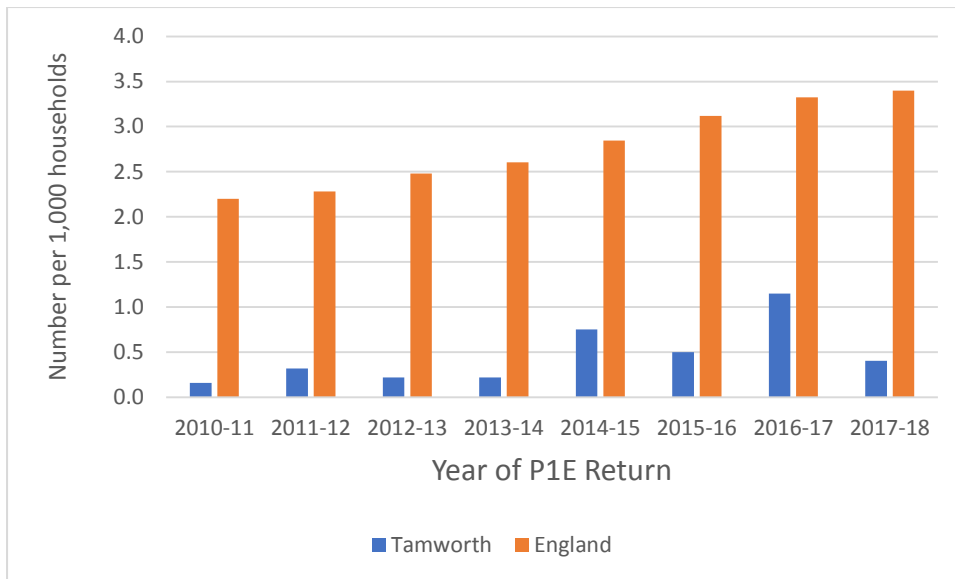
It is, however, evident that there was a pronounced spike in these local figures in 2016/17 (and in the case of homelessness acceptances also in 2014/15). The tables and figures below and in appendix A confirm these findings.

Figure Two: Homelessness Acceptances per 1,000 Households



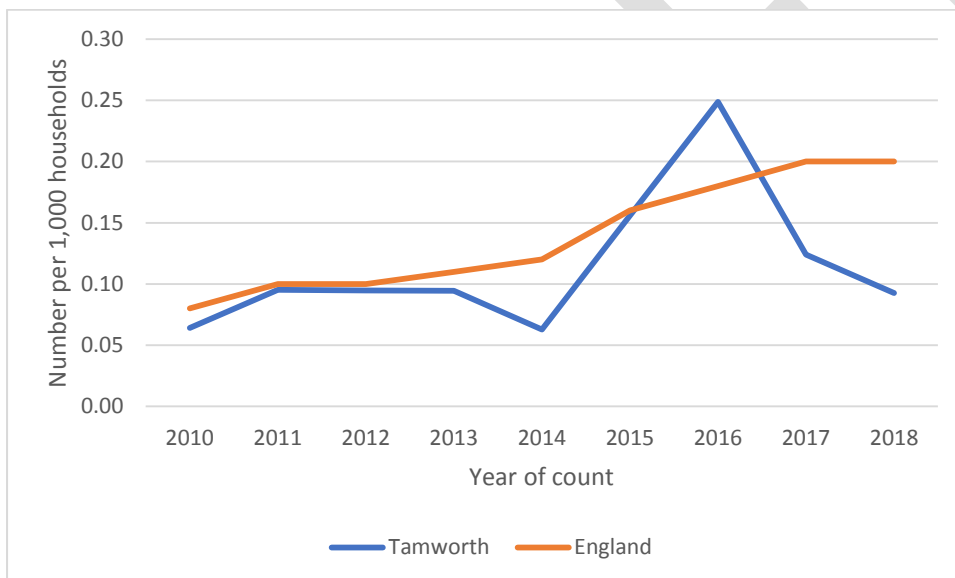
Source: P1E returns

Figure Three: Number of Households in Temporary Accommodation at 31 March per 1,000 Households



Source: P1E returns

Figure Four: Number of Rough Sleepers per 1,000 Households



4.4. Data analysis for Tamworth (August 2020)

In some respects, the trends identified in the previous sub-section for data up to and including 2018 are continued for 2018/19 and 2019/20. More details can be found in the tables in appendix B.

The five salient points are:

- The number of relief cases is exceeding those owed a Prevention duty
 - The mean number of prevention cases per quarter fell from 37 in 2018/19 to 23 in 2019/20

- The mean number of relief cases per quarter rose from 41 in 2018/19 to 55 in 2019/20
 - The rate per 000 households for relief cases in Tamworth is consistently higher than the rate for England and is consistently lower for prevention cases in Tamworth than for England
- The two major immediate reasons for homelessness continue to be the loss of a tenancy in the private rented sector and the unwillingness of families and friends to continue to provide accommodation (see next sub-section).
 - The support needs of people likely to become or who are homeless is dominated by mental health issues (and this trend is growing) – the mean figure per quarter in 2018/19 was 26 cases and this increased to 31 cases in 2019/20.
 - The use of temporary accommodation in Tamworth continues to be at a significantly lower level compared with England – the rate per 000 households is approximately 16 per cent of the national figure.
 - The annual rough sleeper count continues to show a low number – for 2019, the figure was 5 cases.

4.5. *Reasons for homelessness and rough sleeping*

Policy and research on homelessness and rough sleeping distinguish between (i) immediate trigger factors (eg loss of an assured shorthold tenancy), (ii) personal circumstances (eg relationship breakdown, support needs etc) and (iii) broader structural considerations (eg lack of affordable housing).

It is important to appreciate the overlap between these three categories. For instance, official statistics include relationship breakdown as an immediate reason, while research often incorporates it as a personal circumstance issue.

These are now discussed in turn.

Immediate reasons for homelessness

Evidence from the HQN interviews (supported by limited data pre-2018 and 2018/19 – 2019/20) indicate that there are a number of local trends that follow the national pattern eg the four major immediate reasons for homelessness – potential or actual loss of private rented accommodation, the unwillingness of families and friends to continue to provide a home, relationship breakdown and domestic abuse / other violence. Of these, the most significant for Tamworth are loss of private rented accommodation and unwillingness of families and friends to continue to provide a home, with the former increasing in significance at the expense of the latter since 2018.

Table Four: Main Reasons for the Loss of the Last Settled Home for Households owed a Prevention or Relief Duty (2018/19)¹⁸

Reason	Tamworth (%)	England (%)
End of assured tenancy	19%	20%
Family or friends unwilling to provide accommodation	26%	25%
Relationship breakdown – non-violent	8%	10%
Domestic violence / other violence	11%	10%

Source: MHCLG live tables on homelessness A2 -

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

See also table B2 in appendix b

In relation to the loss of private rented accommodation, the basic issue is that landlords can obtain a higher rent from middle income households even for property in a relatively poor state because of the flourishing nature of the sub-regional housing market that covers Greater Birmingham. Nationally, nearly 50% of cases of the end of an assured tenancy are due to landlords wishing to relet or sell property.

The unwillingness of families and friends to continue to provide accommodation is the most significant factor. HQN interviews with officers and partners highlighted the interplay between two issues. Firstly, there is the adverse impact of welfare changes on low income families (including those where household members are in low-paid employment) – see below. Secondly, there is a commonly held assumption among some households that the ‘homelessness route’ is the most appropriate way to improve the housing circumstances of family members.

Relationship breakdown was confirmed by some of the interviewees as a small but important factor. National research by organisations, such as Shelter, suggests that the lack of awareness of legal rights re joint tenancies / joint owners and marital / civil partnership status are important factors. This was confirmed in our interviews.

Domestic violence / other violence in relation to homelessness has been the subject of considerable recent discussion of the adequacy or otherwise of local authority duties as illustrated in a debate in Parliament in June 2019¹⁹. More broadly, it is important to note that official statistics demonstrate that it is the third most common reason for a person needing local authority support (after mental health and physical ill-health).

Personal Circumstances

¹⁸ Please note that these figures are based on experimental statistics – the national data has been updated on a number of occasions

¹⁹ See <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CDP-2019-0139>

Our interview findings (together with the data analysis in appendix B²⁰) can be compared with national evidence:

- Multiple exclusion homelessness: Homeless households and rough sleepers experience more than one form of social exclusion such as institutional care (eg local authority care, prison and / or mental health hospitals), substance abuse (eg drugs, alcohol and / or solvents) and participation in 'street culture activities' (eg begging, street drinking and / or survival shoplifting) – in the case of Tamworth (unlike the situation in England as a whole) the number of people with more than one support requirement has remained similar for the last two years
- Mental health issues: Increasing incidence of homeless people and rough sleepers with mental health issues – in the case of Tamworth this is the most significant support issue
- Drug addiction issues: Increasing incidence of homeless people and rough sleepers with drug addiction issues (as highlighted nationally in the report on *drug-related harms in homeless populations* by the Advisory Council on the Misuse of Drugs) – in the case of Tamworth, drug and alcohol abuse concerns has remained at a relatively low level for the last two years
- Visibility: Homeless households and rough sleepers are often known to many public and third sector organisations but are reluctant to engage with service providers and
- Revolving door of homelessness (or 'repeat homelessness'): Individuals 'cycling' between, for example, prison and homelessness or, and much more commonly, 'temporary accommodation' and rough sleeping – in the case of Tamworth, our data, nevertheless, shows that repeat homelessness is not a major issue.

In addition, there are some specific (and, in some cases, emerging) issues affecting the Tamworth area. According to stakeholders interviewed by HQN, these include:

- Impact of county lines and cuckooing on vulnerable households in the social and private rented sectors leading to the potential loss of accommodation (Cuckooing is a term used by the police where drug dealers take over the home of a vulnerable person in order to use it as a base for county lines drug trafficking).
- Consequences of urban local authorities in the region placing families with a multiplicity of issues in a range of 'temporary accommodation' in Tamworth potentially resulting in some members experiencing homelessness and rough sleeping
- Military veterans across the County experiencing or facing homelessness and rough sleeping
- Stigma and social isolation faced by homeless households and
- Small numbers of homeless individuals and rough sleepers that have chaotic lifestyles adversely impacting on other communities and reluctant to engage with service providers.

²⁰ Support needs (see table B3 in appendix B) is frequently used as a proxy indicator for personal circumstances.

In the case of military veterans, stakeholders and officers interviewed by HQN had differing views. Staffordshire County Council highlighted this issue, but third sector organisations indicated that it was of marginal significance. However, the data in table B3 in appendix B indicates that this has not been an issue over the last two years.

Structural Considerations

These factors relate to the wider state of the economy and the housing market. They include:

- Lack of housing supply
- Crisis of affordability
- Unaffordability of home ownership and
- Welfare changes especially local housing allowances and its impact on the affordability of the private rented sector.

There has been and continues to be national discussions and debates on these topics.

From a local perspective, it is essential to make the links with the emerging housing strategy (and the evidence-base underpinning it – see next section).

Wider local evidence-base

Introduction

This section summarises the emerging findings from the draft evidence-base for the local housing strategy. Readers interested in additional detail should consult the full report.

As with the homelessness prevention and rough sleeping evidence-base, a broad approach has been taken ie ‘information to inform decision-making’.

There are three sub-sections:

- Key emerging policy themes
- Data summary
- Other relevant strategies and policies.

Key themes

There are seven key themes in the evidence-base. These are highlighted in the table below along with their relevance for addressing homelessness and rough sleeping. They begin to address the three issues that have been emphasised in the previous section – the immediate reasons for homelessness, personal circumstances and structural factors.

Table Five: Key Themes in the Local Housing Strategy Draft Evidence-base

Key themes	Relevance for homelessness and rough sleeping
1. Development of 250 new homes per year to meet the needs of the existing population and those attracted to the area for work, either locally or in easy commuting distance	Boosting new housing provision begins to tackle the structural issue of lack of supply
2. Provide a range of new homes to reflect need and aspiration, particularly affordable homes	Provision of new affordable homes addresses the affordability issue that underpins homelessness issues
3. Ensuring Housing plays a key role in delivering Tamworth's response to climate change	High quality housing can help to reduce households' living costs by, for instance, addressing fuel poverty – so reducing the probability of homelessness
4. Ensure new housing is incorporated into the regeneration of the town centre	As for key themes one and seven
5. Improve conditions in the private sector	Ending of an assured tenancy is a major immediate reason for homelessness
6. Improve tenancy sustainment rates	Proactive initiatives to maintain an existing tenancy reduces the likelihood of homelessness
7. Providing a wider range of options for older people and for younger people.	Younger people on low incomes are more likely to experience homelessness and rough sleeping (eg sofa surfing)

Local policy context – data summary

The draft data element of the evidence-base for the local housing strategy draws on two sources. These are (i) the Tamworth data pack (2018) produced by the Staffordshire Observatory²¹ and (ii) the joint strategic needs assessment (JSNA)²² published by Staffordshire County Council and the Staffordshire Observatory.

²¹ See <https://www.staffordshireobservatory.org.uk/documents/District-Borough-Data-Packs/2018/Tamworth-Data-Pack-2018.pdf>

The key points relevant for homelessness and rough sleeping are covered in the table below:

Table Six: Key Data

Key data	Relevance for homelessness and rough sleeping
18% of Tamworth residents live within the most deprived national quintile	There is research evidence indicating that deprived households and households where no adults are in employment are disproportionately affected by homelessness
Tamworth has a higher than average proportion of children living in households where there are no adults in employment	
Tamworth has a higher than average proportion of children absent or excluded from school	The Government's troubled families programme found that loss of a tenancy was correlated with school exclusion
Around 30% of residents are estimated to be financially stressed (nationally 28%)	Financial stress is an underpinning indicator linked to homelessness
Average house price (£170,000) is more than 6.8 times the average gross salary (£25,098)	This data highlights the importance of affordable housing options to prevent homelessness
Around one in ten households is living in fuel poverty	Fuel poverty contributes to affordability issues and tenancy sustainment (see previous table)
Rates of teenage pregnancy are high	This links to the 'commonly-held assumption among some households that the 'homelessness route' is the most appropriate way to improve the housing circumstances of family members' (see section 4.5. above).
There is a recognised need to improve the percentage of vulnerable adults who live in stable and appropriate accommodation	Proactive action to provide stable and appropriate accommodation addresses the revolving door issue of homelessness and rough sleeping

Other relevant strategies and policies

²² See summary at

<http://moderngov.staffordshire.gov.uk/documents/s105011/Appendix%20A%20for%20JSNA%20Outcomes%20Report.pdf> and full reports at <https://www.staffordshireobservatory.org.uk/publications/healthandwellbeing/yourhealthinstaffordshire.aspx#.XzEOOa-SmUk>

The draft evidence base for the local housing strategy identifies three relevant policy documents for homelessness prevention and rough sleeping:

- Our corporate plan
- Community safety partnership plan
- County-wide community safety agreement.

The salient elements of each of these documents are highlighted in the next three paragraphs.

Our corporate plan (2019-2022) has as its vision to 'put Tamworth, its people and the local economy at the heart of everything we do'. This is underpinned by statements of purpose – four of which relate to tackling homelessness and rough sleeping including 'help prevent homelessness and help people access suitable housing'.

- Help tackle causes and effects of poverty and financial hardship
- Utilise Council resources effectively
- Help tackle the causes of inequality and increase opportunities for all residents and businesses
- Help prevent homelessness and help people access suitable housing.

The *community safety partnership plan for Tamworth* is updated annually. The six priorities are:

- Anti-social behaviour
- Protecting the vulnerable in our communities
- Public place violence and disorder
- Domestic abuse
- Road safety
- Alcohol and substance misuse.

Apart from 'road safety', the other five priorities are relevant for policies for homelessness prevention and rough sleeping. For example, the immediate reasons for homelessness include domestic abuse, while personal circumstance factors include vulnerability and alcohol / substance misuse.

The community safety partnership has also adopted a core set of six principles:

- Prevention wherever possible
- Early intervention
- Targeting prolific offenders
- Targeting resources to hotspot areas
- Supporting victims
- Increasing public confidence.

Again, these are relevant for tackling homelessness and rough sleeping. They link with the policy element framework developed by CaCHE (see section 2.4. above) ie targeted intervention, proactive / early prevention, emergency prevention and supporting recovery.

Furthermore, the partnership plan highlights some significant achievements under each of the key priorities, including those relating to housing, such as provision of a night shelter for homeless people, a prison to home project to prevent homelessness amongst those leaving prison, and a crisis support and intervention project. The Pathway project provides early intervention support for victims of domestic abuse. Tamworth has seen a significant upwards trend in cases of reported domestic abuse since 2013. Anyone can become a victim of domestic abuse, but the figures show that most victims are aged under 30 and female.

In terms of implementation, there are daily vulnerability meetings for immediate problem solving of high-risk incidents; these are supplemented by weekly meetings of the Tamworth Vulnerability Partnership to manage and co-ordinate high risk cases involving vulnerable individuals. There are also weekly community safety and risk meetings to take a partnership approach to ASB management and enforcement. The Multi-Agency Risk Assessment Conference (MARAC) meets weekly for high risk domestic abuse cases and community safety staff attend weekly police threat and grip meetings.

Relevant partners confirmed in consultation the value of these meetings and the exchange of information across services. The meetings can be brief, but the regularity offers opportunities to respond to issues at the earliest possible stage. A wide range of partners can attend the meetings including key council officers, the Police and Fire services, County Council Social Services and local support teams, community mental health teams, Staffordshire Victims gateway, integrated offender management and registered providers.

Finally, there is the *community-wide safety agreement*. We are piloting a place-based approach to proactively identify vulnerable families and children, so as to be able to make early interventions. This might include actions to prevent a loss of a tenancy, domestic abuse and relationship breakdown. As we have already pointed out, these are significant factors in the immediate reasons for homelessness.

Appendix A: Data and analysis on homelessness and rough sleeping in Tamworth up to and including 2018

This material was compiled by HQN in autumn 2019

Table A1: Statutory homelessness applications from eligible households in Tamworth

Year	Accepted as homeless	Unsuccessful applications			Total decisions	Annual change in acceptances
		Unsuccessful applications: Intentionally homeless	Unsuccessful applications: Homeless but not priority	Unsuccessful applications: Eligible but not homeless		
2010-11	72	5	4	10	91	
2011-12	107	8	3	21	139	+ 49%
2012-13	68	9	5	6	88	- 36%
2013-14	67	15	8		92	- 1%
2014-15	168	9	23	40	240	+ 151%
2015-16	68	6	9	19	102	- 60%
2016-17	128	19	16	48	211	+ 88%
2017-18	76	11	8	23	118	- 41%

Source: P1E Returns



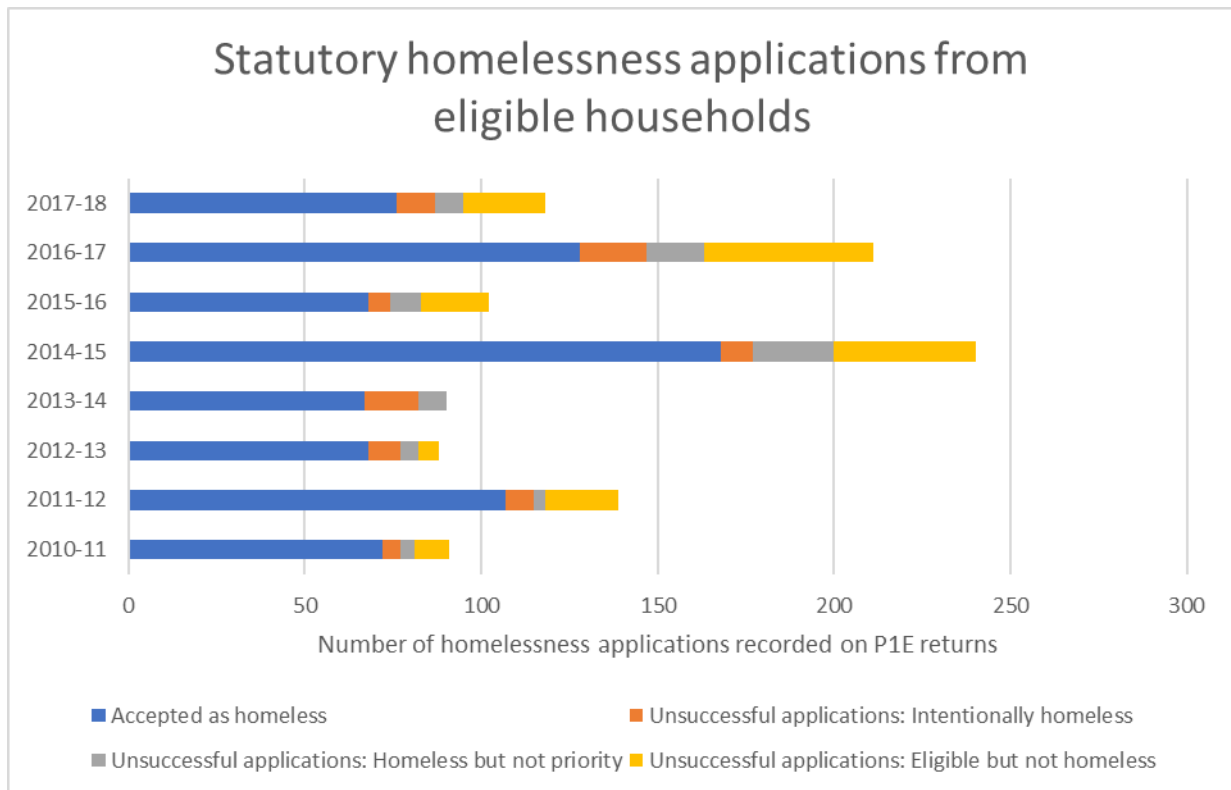


Table A2: Homelessness acceptances per 1,000 households in Tamworth

Year	Homelessness acceptances per 1,000 households
2010-11	2.3
2011-12	3.4
2012-13	2.1
2013-14	2.1
2014-15	5.3
2015-16	2.1
2016-17	4.0
2017-18	2.4

Source: P1E Returns

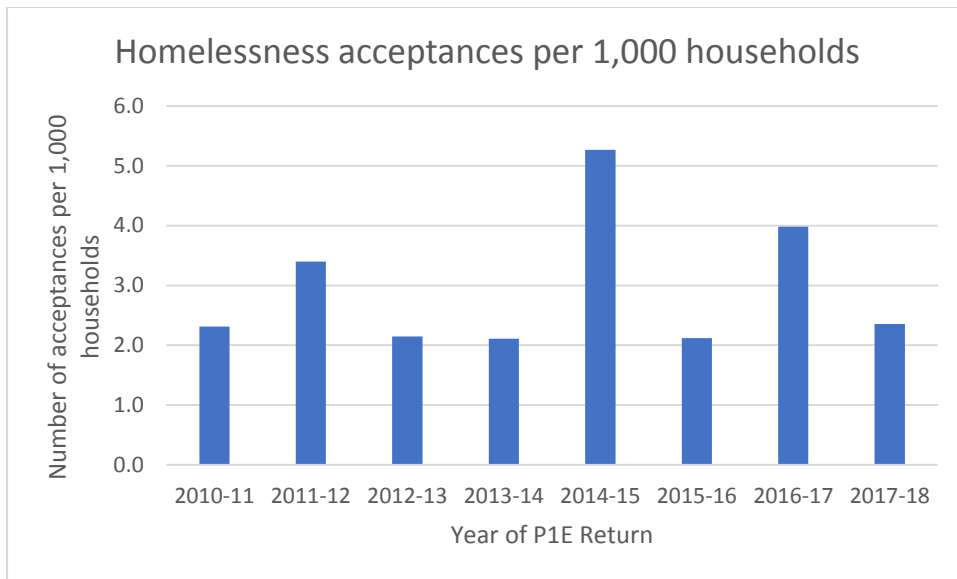
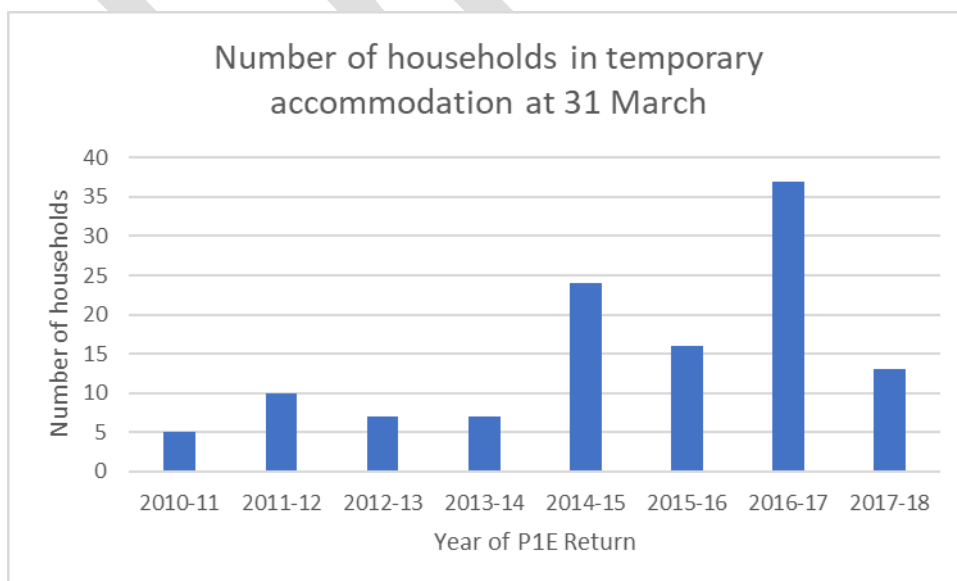


Table A3: Number of households in temporary accommodation at 31 March in Tamworth

Year	Number of households	Number per 1,000 households
2010-11	5	0.2
2011-12	10	0.3
2012-13	7	0.2
2013-14	7	0.2
2014-15	24	0.8
2015-16	16	0.5
2016-17	37	1.2
2017-18	13	0.4

Source: P1E Returns



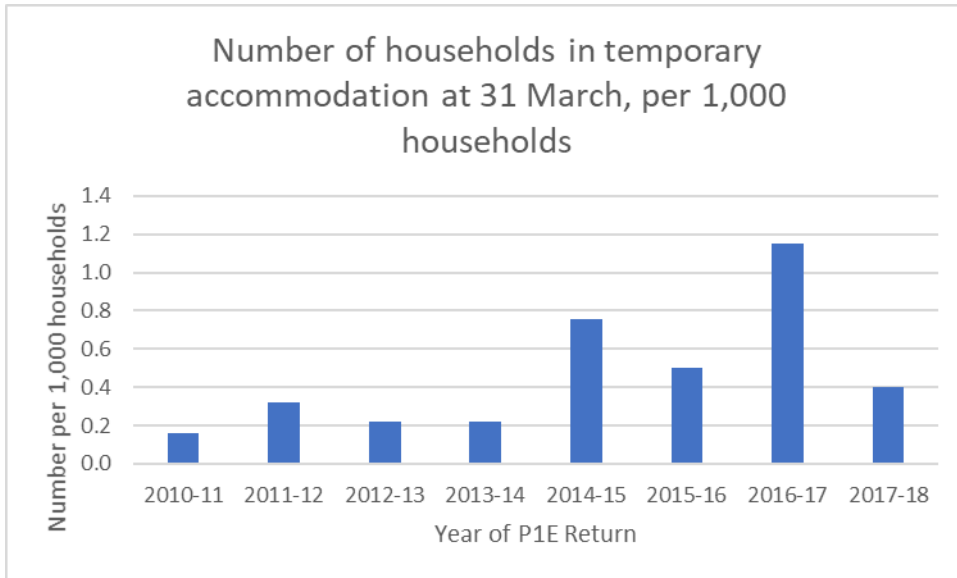


Table A4: Number of rough sleepers in Tamworth

Year	Number of rough sleepers
2010	2
2011	3
2012	3
2013	3
2014	2
2015	5
2016	8
2017	4
2018	3

Source: P1E Returns

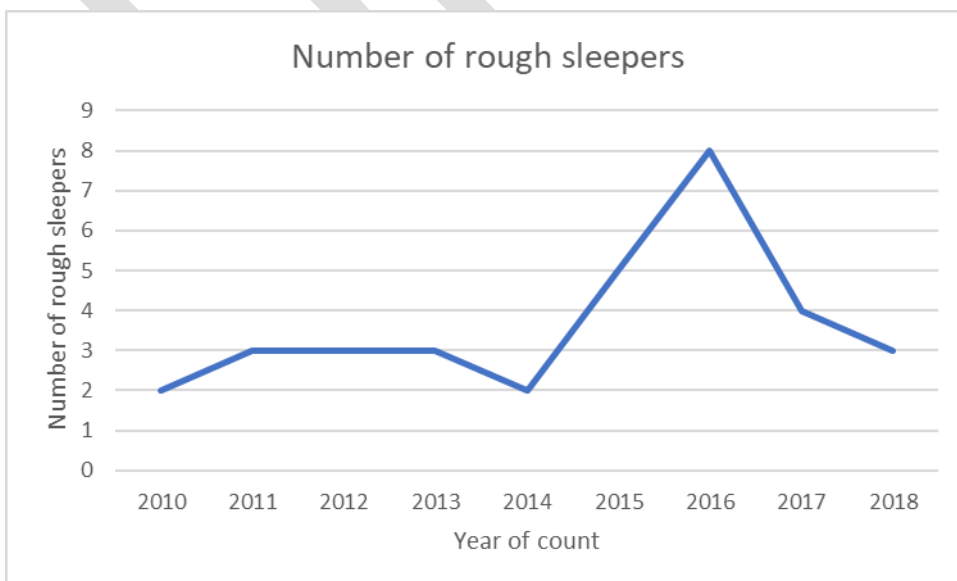


Table A5: Number of rough sleepers per 1,000 households in Tamworth

Year	Number of rough sleepers per 1,000 households
2010	0.06
2011	0.10
2012	0.09
2013	0.09
2014	0.06
2015	0.16
2016	0.25
2017	0.12
2018	0.09

Source: P1E Returns

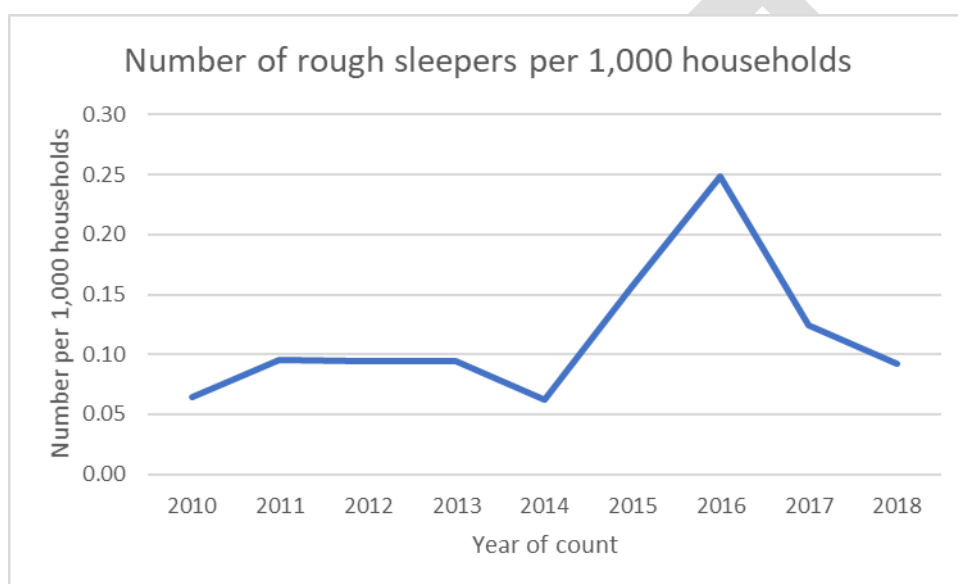
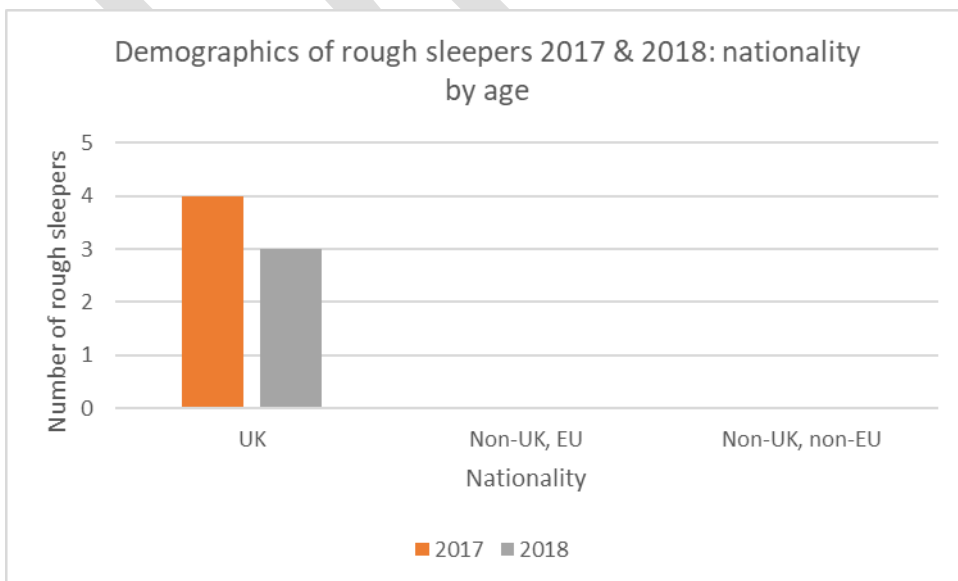
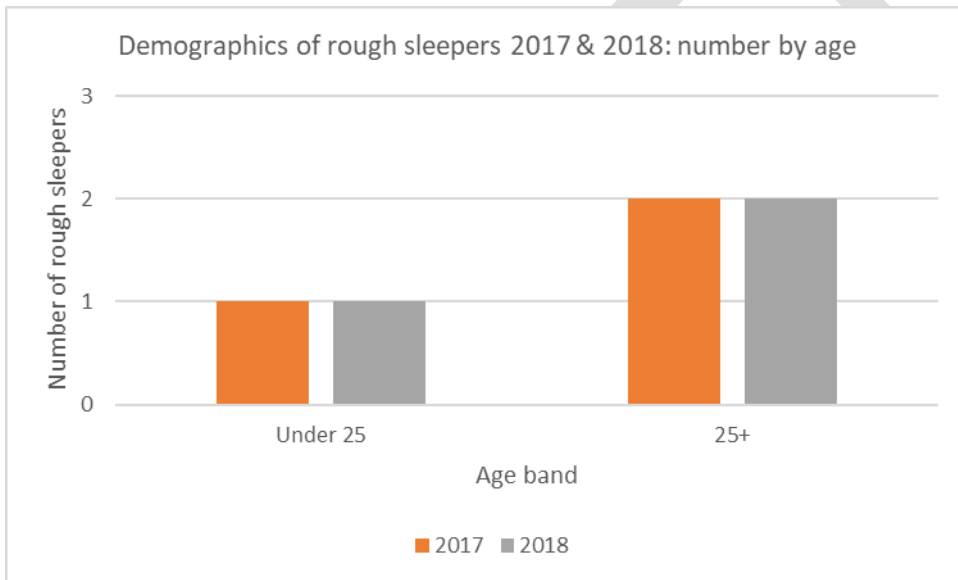
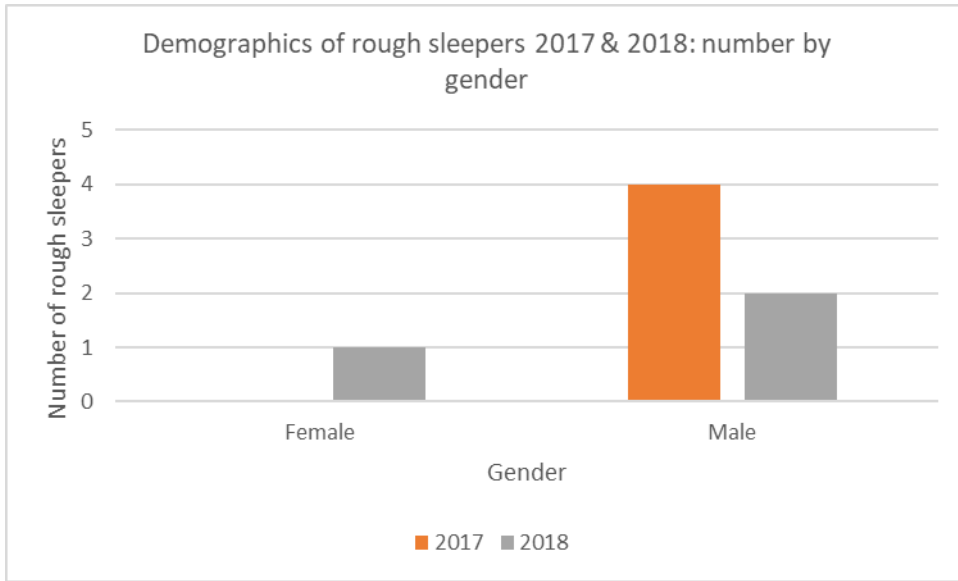


Table A6: Demographics of rough sleepers in Tamworth

Gender	2017	2018	TOTAL
Female	0	1	1
Male	4	2	6
Age	2017	2018	TOTAL
Under 25	1	1	2
25+	2	2	4
Nationality	2017	2018	TOTAL
UK	4	3	7
Non-UK, EU	0	0	0
Non-UK, non-EU	0	0	0

Source: P1E Returns



Appendix B: Data and analysis on homelessness and rough sleeping in Tamworth for 2018/19 – 2019/20

This was compiled by HQN in August 2020 using MHCLG quarterly data releases and updates – see <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness#statutory-homelessness-live-tables> and <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness#rough-sleeping-tables>

Table B1: Households Assessed as Owed a Homelessness Duty – 2018/19 - 2019/20

		2018/19				2019/20			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Total no of households assessed as owed a homelessness duty		78	72	76	82	85	77	71	85
Prevention duty owed (no)		40	33	41	28	32	20	21	23
Relief duty owed (no)		38	39	35	54	53	57	50	62
<i>Households assessed as threatened by homelessness (per 000 hhds)</i>	<i>Tamworth</i>	<i>Not available</i>	<i>Not available</i>	<i>Not available</i>	<i>Not available</i>	<i>0.99</i>	<i>0.62</i>	<i>0.65</i>	<i>0.71</i>
	<i>England</i>					<i>1.58</i>	<i>1.61</i>	<i>1.48</i>	<i>1.63</i>
<i>Households assessed as homeless (per 000 hhds)</i>	<i>Tamworth</i>	<i>Not available</i>	<i>Not available</i>	<i>Not available</i>	<i>Not available</i>	<i>1.63</i>	<i>1.52</i>	<i>1.54</i>	<i>1.92</i>
	<i>England</i>					<i>1.41</i>	<i>1.76</i>	<i>1.45</i>	<i>1.56</i>

Three key trends:

- Number of cases per quarter shows little variation
- Prevention duty cases is declining while relief duties are increasing

- Rate of households assessed as threatened by homelessness is significantly lower than the figure for England, while the rate of households assessed as homeless is higher than the figure for England.

Table B2: Main Reasons for Threat / Loss of a Home – 2018/19 – 2019/20

Main reasons for the loss / threat of loss of home (no)	2018/19				2019/20			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
End of private rented tenancy	16	17	19	19	30	19	20	24
Friends / families unwilling to continue to provide accommodation	30	29	23	21	23	16	21	27
Domestic abuse	8	6	6	9	8	8	5	7
Relationship breakdown (non-violent)	5	4	4	10	8	9	6	10

Two key trends:

- End of a private rented tenancy and friends / families unwilling to provide accommodation are the two main immediate reasons for the loss / threat of the loss of accommodation
- End of a private rented tenancy is gradually becoming an even more significant issue.

Table B3: Support Needs – 2018/19 – 2019/20

Main support needs (no)	2018/19				2019/20			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<i>More than one support need</i>	35	25	19	21	27	25	32	31
Mental health	30	17	23	35	30	23	31	40
Physical ill-health / disability	11	11	9	12	11	10	18	14
Learning disability	13	10	4	2	5	4	3	6
Domestic abuse	10	5	10	10	8	10	6	12
Offending history	9	7	5	5	4	4	4	3
Repeat homelessness	7	5	2	4	4	4	7	6
Substance abuse	4	10	5	9	6	10	10	5
HM forces	1	1	0	1	1	1	0	0

Five key trends:

- The number of people / households with one or more support needs remains more or less constant
- Mental health issues are the most significant support requirement
- Learning disability and / or autism has become less of an issue over the last two years
- Repeat homelessness is a relatively small issue
- There is no evidence that having previously been a member of HM forces is an issue in Tamworth.

Table B4: Temporary Accommodation – 2018/19 – 2019/20

		2018/19				2019/20			
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Households in temporary accommodation at end of quarter (Nos)		15	17	17	18	14	20	25	21
Bed & breakfast accommodation (Nos)		1	5	4	2	0	3	5	1
<i>Total number of households in temporary accommodation (per 000 hhds)</i>	<i>Tamworth</i>	<i>0.46</i>	<i>0.53</i>	<i>0.53</i>	<i>0.55</i>	<i>0.43</i>	<i>0.62</i>	<i>0.77</i>	<i>0.65</i>
	<i>England</i>	<i>3.55</i>	<i>3.59</i>	<i>3.60</i>	<i>3.64</i>	<i>3.69</i>	<i>3.74</i>	<i>3.78</i>	<i>3.95</i>

Three key trends:

- Gradual growth in the use of temporary accommodation in Tamworth but this trend is less pronounced compared to the rate for England
- Use of temporary accommodation in Tamworth is only 16 per cent of the rate for England
- Little use is made of bed and breakfast accommodation in Tamworth and over the two-year period, little or no use has been made of this accommodation for families with children.

Table B5: Rough Sleepers – 2017 to 2019

Tamworth	2017	2018	2019
No of rough sleepers	4	3	5

Two key trends:

- Continuation of previous trend of low numbers of rough sleepers – between 2010 and 2019, the number of cases has ranged from 2 to 8 cases per year
- Profile of rough sleepers is predominantly male, UK born and over 26 years of age.

Appendix C: HQN study on homelessness and rough sleeping (autumn 2019): Approach

HQN undertook a study in autumn 2019. It was based on five elements:

- A review of recent national policy and research on homelessness and rough sleeping primarily in England
- A telephone survey of a sample of district councils in the Midlands
- An analysis of local and national data
- A review of local policy documents and
- Interviews with (i) partners and (ii) borough council officers.

Table A1: Research Approach

Elements	Method
Review of national policy and research	<ul style="list-style-type: none"> • Literature search of databases • Website searches eg MCHLG, House of Commons Library, Local Government Association, Crisis, Shelter and CaCHE • Analysis of reports
Telephone survey of district councils in the Midlands	<ul style="list-style-type: none"> • Semi-structured interviews with housing policy officers in 10 local authorities in the Midlands in October 2019 • Focus on aspects of preparing homelessness and rough sleeping strategies eg evidence base, timetable, policy issues and consultation process
Analysis of local and national data	<ul style="list-style-type: none"> • Use of MHCLG P1E data from 2010-2018 for England and Tamworth
Review of local policy documents	<ul style="list-style-type: none"> • Tamworth Borough Council Homeless Prevention Strategy 2016-2020 (including Action Plan, Evidence Base and Spending Priorities) • Tamworth Borough Council Allocations Policy (Draft) • Tamworth Borough Council Adopted Local Plan 2016 • Tamworth Community Safety Partnership Plan 2017-2020: Update 2018
Interviews with partners and council officers	<ul style="list-style-type: none"> • Semi-structured interviews (including face-to-face and telephone interviews) in September and October 2019 with 11 representatives of public sector and voluntary sector / third sector agencies • Focus on the activities and policies of the organisations, involvement with homelessness and rough sleeping, relationship with the local authority

	<p>and current issues</p> <ul style="list-style-type: none">• Confidentiality of the interviewees• Semi-structured interviews with six council officers in September 2019• Focus on housing options, advice / support and personal housing plans• Confidentiality of the interviewees
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Appendix D - Homelessness Prevention Strategy- Achievements

5 Priorities from 2016-20 Strategy	Achievements to date
<p>Improving and Enhancing Homelessness Prevention Activities</p>	<ul style="list-style-type: none"> • Duty to refer active referral early intervention pathway for partners • Interlink departments with joint commissioning between Income/ Council Tax/ Benefits and Housing Solutions • Partner funding streams for customers- DHP and signposting customers to other funding available From The Job Centre • Housing Solutions Fund policy • Allocations Policy 2020- revised bandings • Trained Mediators within the team • Referrals to supported accommodation units • Advice and Assistance on applying to Court for warrant suspensions • Personal Housing Plans (PHP's)
<p>Improving joint working to ensure effective partnerships are in place</p>	<ul style="list-style-type: none"> • Expanding local knowledge with partners • Commissioning services e.g Tamworth Advice Centre • Supporting rough sleepers though joint visits with police and support services • Staffordshire wide 16/17 & Care leaver protocol developing cross sector support for vulnerable young people • Tamworth Vulnerability Partnership (TVP) supporting tenancy sustainment
<p>Increasing the supply of affordable housing and provide more settled homes</p>	<ul style="list-style-type: none"> • 106 agreements- working closely with the development of the housing strategy • TBC own stock new builds Kerria/ Tinkers- increasing the number of good quality homes • Acquisitions- expanding property types to met housing

	<p>need in the area</p> <ul style="list-style-type: none"> • Working with key partners and RSL's via nominations • Exploring commissioning options for support once in a home in order to increase sustainment
<p>Improving access to accommodation and services particularly for vulnerable people and those at risk of homelessness</p>	<ul style="list-style-type: none"> • Allocations Policy 2020- revised banding for those who are homeless and verified as rough sleeping • Referrals to Rough sleeper pathways • HRA- PHP;s • Attending Landlord's forum to support rehousing pathways and eviction prevention
<p>Improve health outcomes and reduced health inequalities for those who are homeless</p>	<ul style="list-style-type: none"> • Duty to refer- working directly with the hospital as a key point of contact • Rapid referral channels via mental health and A&E • Commissioning mental health worker 2019/20 • Providing good quality TA for those who are homeless which meets individual needs including level access facilities, supported units and accommodation options centrally located to access town centre services. • Supported through revised Relief Duty Banding under Allocations Policy 2020 • Create a 'temporary accommodation manager' role within the team to support those clients in TA.

Achievement	Detail
Reduced use of Bed and Breakfast accommodation	Expanding the TA offer within the service has resulted in a spend reduction for B&B and more suitable TA facilities being provided to varying client groups to include larger properties and supported units
Developing a robust temporary accommodation offer for homeless households	Introduction of a temporary accommodation manager to support the customer journey while in TA through our range of TA properties
Facilitating an enhanced package of support for rough sleepers during the winter months.	Working directly with the 3 rd sector to support them in operating a popular winter night shelter providing up to 10 additional bed spaces during the winter months.
Cross departmental funding for the Citizens Advice Bureau	Working in partnership with internal Council departments including benefits and tenancy sustainment, the CAB operate a customer lead, outcome focused service for residents of Tamworth to support with Debt, Housing and benefit advice. Performance is monitored through quarterly meetings.
Improving customer access to online services	Through developing a range of online Factsheets, updating the website advice, supporting a webchat option, expanding the use of the customer portal to ensure the most reactive response to homelessness
Creating a range of e-forms for customer use	Customers can now apply for housing using an e-editable form therefore reducing the reliance on paper. Customers can now also complete change of circumstances forms and homeless initial enquiry forms online.
Purchased a new IT system to support our homelessness function	The 'Jigsaw' IT system was procured by the service in 2017 in order to support the functions required under the Homelessness Reduction Act 2017. The web based service
Increased capacity within the team to support customer support	Developing the service and the service offer to customers has led to a natural development within the team in terms of case officers and additional capacity within the review and compliance team to ensure customer service standard are upheld
Implemented a new 'Allocations Policy'	Which has increased the ability for the service to house those in the most housing need.