

Three Rivers District Council

**HOMELESS REDUCTION ACT IMPLEMENTATION**

**PROJECT INITIATION DOCUMENT**

**(P.I.D. Lite)**

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| **Project Sponsor** | Kimberley Grout |
| **Project Manager** | Hannah Morris |
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| **Author**  | Kimberley Grout |

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Distribution

|  |  |  |
| --- | --- | --- |
| Name | Position | Organisation/ Service |
| Geof Muggeridge | Director of Community and Environmental Services | Director |
| Jo Wagstaffe | Director of Finance | Director |
| Hannah Morris | Housing Options Manager | Housing |
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Approval

|  |  |  |
| --- | --- | --- |
| Name | Position | Date approved |
| Geof Muggeridge | Director of Community and Environmental Services | 5 October 2017 |
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# 1 Introduction

## Purpose of the document

The Project Initiation Document (Lite) consolidates information required regarding the fundamental aspects of the project and is the basis against which the project is evaluated and prioritised.

* Why is this project important
* What will the project do, what outcomes will be delivered, what are the success factors and risks
* How much will it cost, what resources are required

*\*\* This document is a “lite” version of the full Project Initiation Document (PID) required when initiating the project fully. The full PID contains additional information.*

* *How will the project be implemented, how will it be managed*
* *When will the project be implemented*
* *Who will be involved and who will be impacted*

## Executive Summary

1.2.1 This project is a bid for revenue growth for additional staff within the Housing team, see appendix one for current and proposed staff structures.

1.2.2 The increase in staff is required to comply with new duties imposed by the Homelessness Reduction Act 2017 (the Act) which is due to be implemented in April 2018.

1.2.3 The additional requirements of the Act provides for an additional seven rights of review. The Council contracts out review decisions to an independent company so this is likely to result in a need for increased funding to cover this.

1.2.4 The implementation of the Act will also require additional IT solutions in order to make best use of staff time and the expectations of customers.

## Project Objectives

1.3.1 To provide two full-time Housing Options Officers to complement the current team.

1.3.2 To provide resilience in the team by having all generic Officers, which will mean the change in job for the Housing Advice Officer and increase in scale from scale 6 to SO1-2.

1.3.3 To comply with the legal requirements of the Homeless Reduction Act 2017.

1.3.4 To provide an interactive computer system to promote self-solution for customers rather than costly personal intervention between staff and customers.

1.3.5 To provide a temporary resource of a full-time project manager for six months to facilitate the change in computer system and other work associated with the Act.

## Current issues and priorities

1.4.1 Homelessness prevention supports both of the Councils Strategic Plan themes, of Better Neighbourhoods and Healthier Communities.

1.4.2 Specifically, the project seeks to address the following objectives of the strategic plan 2017/20:

2.3 We want to support the most vulnerable in our District

## Implications of project not being complete

1.5.1 Failure to comply with the legislation resulting in risk of litigation.

1.5.2 Increased pressure and strain on the existing staff members which could result in increased levels of stress and sickness.

1.5.3 Increased complaints including those escalated to the Local Government Ombudsman which could impact on the reputation of the Council.

# Business Case

Why should this project be undertaken?

The incidence of homelessness has been growing significantly both locally and nationally over the last two years, as has been previously reported to Management Board and numerous Committees.

The increase in demand for homelessness and prevention services is set to grow significantly with the introduction of the Homelessness Reduction Act 2017 which will be implemented from 1 April 2018. There have been a number of Local Authorities such as Southwark and Rushmoor that received trail blazer funding to pilot the new ways of working.

The Council is already facing increasing service demands in advance of changes in legislation and it is vital that the service is adequately prepared and resourced for the future changes set out in this report as this is going to significantly impact service delivery.

**Homeless Reduction Act**

The Act represents an immense change in the support that must be given to all persons presenting as homeless or threatened with homelessness including those who are not deemed to be vulnerable or in priority need. It also doubles the time that any temporary accommodation may need to be provided at a minimum, but in some cases could be longer.

Under current legislation, those seeking help from the Council because they are threatened with or actually homeless are evaluated using the following criteria:

* Their **eligibility** (e.g. a British citizen)
* Whether they are **homeless** or threatened with homelessness within **28 days**
* Whether they are a **priority** under the legislation (e.g., a household with dependent children or household with a vulnerable person due to old age, physical disability, learning disability or mental health issues, or other reasons as defined)
* Whether they have caused their own homeless so are they **intentionally homeless**
* Whether they have a homelessness **local connection** with the Council which is different to the local connection for the Housing Register.

Under the Act, the definition of homelessness will be changing to being homeless or threatened with homelessness within 56 days from the current 28 days. This has doubled the period over which the Council must work with someone prior to them becoming homeless.

The Act will see a homeless application consisting of three parts being the Prevention, Relief and decision duty stages compared to currently just a decision duty stage.

 At an initial approach for assistance Officers must first assess a customer’s eligibility and if they are homeless within the new definition. If a customer does not satisfy either condition then a negative decision must be issued to the customer. If both are satisfied then the Council will also have to fulfil two new duties **before** deciding on priority, intentionality and local connection as follows:

* A **Prevention** duty: If threatened with homelessness, the Council will be under a new duty to prevent a customer from becoming homeless. The duty to prevent homelessness lasts for up to 56 days, however, if the customer remains at risk of homelessness the Council will have a power to continue to try to prevent homelessness. Under certain criteria, if the Council believe that the duty ends then this must be put in writing with a right to review the decision given to the applicant.
* A **Relief** duty: If it is not possible to prevent a customer from becoming homeless (prevention duty ended) or they are already homeless at the time they apply then the Council will be under a new duty to help the customer secure accommodation. This duty lasts for 56 days. The duty remains for those who may be homeless and may be in priority need to assess whether interim accommodation is owed. Under certain criteria, if the Council believe that the relief duty ends then again this must be put in writing with a right to review the decision given to the applicant.

Only after the Relief duty has come to an end and the household has not found an alternative home, is the Council able to determine priority, intentionality and local connection and thus whether it has a duty to house.

For everyone approaching the Council for assistance because they are threatened with or actually homeless, the Council must work with them to agree and put in place a bespoke Personal Housing Plan (PHP). The PHP must set out the reason(s) a customer is threatened with or actually homeless, their circumstances, their support needs, what the Council will do to help them resolve their situation and what the customer will do. As previously stated, Southwark Council are currently piloting the Act and they have confirmed that these initial appointments now take over two hours per customer. Housing Services currently spend approximately 30 minutes with a customer but this will increase to four times longer just on the initial approach. The Personal Housing Plan forms the basis of the work with the client and has to be constantly updated with progress or decisions made.

PHPs mean the ethos of the relationship with the customer must change to being highly supportive and be conducted in this way throughout the Prevention and Relief duty periods. Reference to priority or intentionality whilst the Prevention and Relief duties are in place is no longer relevant.

Public bodies (yet to be defined) will have a duty to refer anyone they believe is threatened with or actually homeless to the relevant Local Authority, which is likely to increase the Housing team’s workload considerably. Within the PHP’s is it a requirement to identify what external support the applicant will require in order to meet all of their health and wellbeing outcomes and this will require the Housing team to have more in-depth liaison with providers and external agencies.

Every interaction with a customer must be recorded and submitted to the Government on a quarterly basis, representing a significant increase in the amount and type of data recording required for submission to Government.

It is predicted there will be a considerable increase in requests for assistance from single people, who are not a priority under current legislation and to whom the Council presently need only provide advice.

In order to provide resilience across a small team it is suggested that all Officers within the Housing Options Team are generic and decision makers. As the Act incites a change to the current way of working this will mean a change is required for the Housing Advice Officer to become a Housing Options Officer, which will increase in scale from scale 6 to SO1-2.

Taking into account the current workload and all of the new requirements that will be expected of the Council, it is estimated that an additional two Housing Options Officers will be needed to comply with the legislation.

**Reviews**

The increased requirements in the Act mean that applicants are able to seek a review of all elements of the new duties as well as their current review rights regarding their accommodation or the decision issued.

There are currently four rights of review for customers and as there will be an additional seven rights of review for customers it is projected that reviews are likely to increase by at least 100%. As the legal requirements of conducting a homelessness review remain unchanged, it is likely that in some cases the Council could be conducting several reviews in respect of one client in relation to different elements of the Act.

It is important to note that whilst reviews are pending, temporary accommodation provision could continue, depending on the circumstances.

As is the legal requirement, reviews are undertaken by an Officer independent from the original decision. For independence and efficiently this is contracted out, with the service going out to tender in the next three months.

An increase in reviews will result in an increase in cost which will be in excess of the current budget allocation. A 100% increase is therefore requested to cover the additional legal requirements.

**Home Connections Computer System**

The Act is highly prescriptive and resource intensive so it is essential that an efficient computer system is in place to assist with the additional burdens placed on the Authority.

Locata Housing Services (LHS) currently provide the Council with a web based system used to manage the Housing Needs Register, the allocation of affordable housing, the delivery of the housing advice service and homelessness duties and any associated functions.

Home Connections are a competitor of LHS and offer a similar service.

The contract with LHS expires on 4 December 2018. The contract can only be terminated in the event of a “Force Majeure”, failure to deliver the service or LHS entering bankruptcy or similar.

To enable efficient and effective customer service and embrace the Council’s digital principles, a new integrated Housing IT system is needed as soon as possible. All housing services processes and data management from end to end is needed; from taking homeless applications, applications to the Housing Register, through to the choice based lettings system and managing the varied temporary accommodation portfolio. Our current Housing IT system has not met our needs for some time now. Recent soft market testing has established that using the current provider to attempt to meet our IT requirements will not represent value for money for the Council. Other providers have been considered but Home Connections is considered to offer the best software package with better value for money than our current provider.

If there is not an effective computer system in place to manage the new duties this will extensively increase the workload for the Housing Options team and could lead to missed deadlines leading to legal challenge.

The Council would in any case need to either procure and implement a new system by December 2018 or extend the current contract and implement a new module of some type in accordance with the Act.

Companies both inside and outside of the G-Cloud procurement framework have been considered. Soft market testing has been completed and the Housing team is satisfied that all suitable suppliers representing value for money are on the G-Cloud framework.

It is therefore proposed the Council implement the Home Connections service from 1 April 2018 in partnership with Watford Borough Council. If agreed, there would be an overlap in the service being provided to the Council from LHS between April 2018 and December 2018. However, it is suggested that Home Connections provide the service from April 2018 to tie in with the new legislation and also to ensure price efficiency by partnering with Watford Borough Council.

G-Cloud allows the Council to sign a contract for an initial two years and then an extension of one year and another further year. Four years is seen as reasonable time for the contract and will ensure that the service keeps up with developing technology.

It is therefore requested to procure Home Connections using the G-Cloud framework to enable greater efficiency and effectiveness for both customers and Officers. It is however important to point out that in order to guarantee the new system to be operational by 1 April 2017 Home Connections require contracts to be signed (in partnership with Watford Borough Council) by **Monday 16 October 2017**. The guarantee from Home Connections includes the requirement for the Council to have a full-time project manager as they will need to work with them to build the system based on our requirements. Due to already working at maximum levels there is no resource within the team to provide this so a temporary resource is required to start immediately for six months to implement the project.

How will project success be measured?

* The number of households prevented from homelessness
* The number of households relieved of homelessness
* All processes completed within the required timescales
* Compliance with the new legislation

## Project Definition

2.1.1 The procurement and implementation of an appropriate software solution to help manage the requirements of the new Homelessness Reduction Act and the integration of this software with the wider housing management IT system.

2.1.2 The recruitment of additional staff to comply with the requirements of the Homelessness Reduction Act.

2.1.3 For a 100% increase in the reviews budget in order to meet the statutory requirements let out in the HRA

2.1.4 For a generic housing options service to be provided including the amendment of the Housing Advice Officer post

## Outputs and Outcomes

Outputs

* Working with customers to produce detailed Personalised Housing Plans to prevent and relieve homelessness.
* Use of an efficient and cost effective computer system to work in line with legislation
* Working in partnership with public bodies, external partner and agencies as per the Homelessness Reduction Act

Outcomes

* Customers are empowered and informed to take responsibility for their own housing
* We are compliant with the new Homelessness Reduction Act legislation
* Achieve the wider health and wellbeing outcomes for customers

## Benefits

2.3.1 By working in partnership with Watford Borough Council the Council will achieve a more efficient computer system at a better rate than if purchased in isolation.

2.3.2 The service provided to customers will be of sufficient level to promote and encourage online interaction which is a more efficient way of working and will likely increase over time.

2.3.3 The implementation cost of the computer system also includes data migration from LHS into Home Connections meaning that customers will not be forced to reapply for the new system, providing a better customer experience.

2.3.4 Staffing levels will be sufficient to comply with the new legislation.

# Project Costs

## One off project costs

It should be noted that the project costs for implementing Home Connections and the ongoing annual cost of the contract is based on joint working with Watford Borough Council. If the Council were to delay implementation until the end of the Locata contract it is likely that implementation and ongoing annual costs would increase as it would be a standalone contract.

|  |  |
| --- | --- |
| **Total Home Connections implementation costs** | **43,250** |
| **Additional cost relating to overlap of two computer systems** | **3,000** |
| **Temporary project manager** | **58,000** |
| **TOTAL ONE-OFF COST OF PROJECT** | **104,250** |
| **Use of homeless prevention grant** | **-35,000** |
| **TOTAL COST REQUESTED** | **69,250** |

**3.2 Ongoing costs for implementation of the Act**

|  |  |
| --- | --- |
| **Additional funds required for increased reviews** | **2,000** |
| **Two full-time Housing Options Officers inc on-costs (SO1-2)** | **68,804****(plus annual increments)** |
| **Change of job from Housing Advice Officer (scale 6) to Housing Options Officer (SO1-2) inc on-costs** | **2,386****(plus annual increments)** |
| **TOTAL** | **73,190** |

## Financial viability

3.2.1 The Government have confirmed that New Burdens funding will be made available for all Local Authorities for at least two years. At this stage it has not been confirmed the level of funding to expect. However, any New Burdens funding could be used towards the cost of the project.

3.2.2 If the New Burdens funding is in excess of the funding requested for the project, it is requested that although these funds may not necessarily be ring-fenced that this be allocated to the Housing Service for use to prevent homelessness.

## Resources and skills

3.3.1 A temporary resource is required to deliver the project of the new computer system, all issues regarding this have already been discussed elsewhere.

3.3.2 Additional staff are requested to comply with the legislation being implemented from April 2018, although it will be important to have staff members in place for the implementation date. Consideration should also be given to the time required to recruit as most Local Authorities in England will be recruiting additional housing staff.

Has the project been agreed by the Head of ICT?

|  |  |
| --- | --- |
| Yes |  |
| No | X |

## Equalities

Is this project responding to an Equality Impact Assessment?

|  |  |
| --- | --- |
| Yes |  |
| No | X |

If yes, please provide brief details of the EIA… \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Has an Equality Impact Assessment been undertaken for this project?

|  |  |
| --- | --- |
| Yes |  |
| No | X |

If yes, what are the outcomes and how do these link to the project?

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## Risks

Initial Risk Log

Likelihood and Probability Key

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Likelihood** | A |  |  |  |  |  | **Impact** | **Likelihood** |
| B |  |  |  |  |  | **V = Catastrophic** | **A = ≥98%** |
| C |  |  |  | 1, 2 |  | **IV = Critical** | **B = 75% - 97%** |
| D |  |  |  | 3 |  | **III = Significant** | **C = 50% - 74%** |
| E |  |  |  |  |  | **II = Marginal** | **D = 25% - 49%** |
| F |  |  |  |  |  | **I = Negligible** | **E = 3% - 24%** |
|  | I | II | III | IV | V |  | **F = ≤2%** |
| **Impact** |  |  |

| Risk | Level of Risk | Required actions | Owner |
| --- | --- | --- | --- |
| Impact | Likeli-hood |
| 1. Failure to comply with legislation | IV | C | Additional staff required | Kimberley Grout |
| 2. Existing software system is not capable of supporting the changes to processes that will be required to deliver the Act | IV | C | Change in computer software required | Kimberley Grout |
| 3. Inability to recruit the new staff members that are required to deal with the impact of the Act or losing existing staff to other authorities as the demand for housing staff increases | IV | D | Recruitment process to begin in January 2018 and a clear implementation plan for existing staff | Hannah Morris |

**Appendix One**

Current Housing Options Structure (excluding the full Housing Service as no other changes are being suggested)

Proposed Housing Options Structure, taking account of the new requirements of the Homelessness Reduction Act