

Welsh Government

## Summary of Responses

# Proposed Changes to Homelessness Data Collections

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## Proposed Changes to Homelessness Data Collections

### User Consultation - Results

#### Summary

A user consultation was conducted to ask for views on proposed changes to the statutory homelessness data currently collected from local authorities. These proposals aim to ensure that the information collected and published on statutory homelessness remains relevant, accurate and meets the needs of users.

The proposed changes were:

- 1) Specific changes to the current homelessness data collection form including:
  - Changing the categories of ethnicity used in line with the 2011 Census classifications
  - Re-ordering and renaming some of the priority need categories.
  - Adding two new categories of main reason for loss – *current property unaffordable and current property unsuitable*.
  - Extending the reasons for loss due to violence or harassment in line with the 2010 Equalities legislation.
- 2) The introduction of a new twice yearly data collection return covering homelessness prevention and relief activity.

The purpose of this consultation was to meet the following objectives:

- To ensure data continues to be available to users where needed.
- To ensure that data collected remains relevant and of good quality.

Thank you to all those who took the time to respond to this user consultation. There were 18 responses to the consultation which ran from 5 December 2011 to 1 February 2012. The report below includes a summary of responses as well as some direct quotes where relevant.

The user consultation showed that:

- 100 per cent of respondents were content for the categories of ethnicity used in table 2 of the annual return – *'Households for which decisions were taken by ethnic group of applicant'* to be changed in line with the 2011 Census classifications.

**Decision:** We will make the change to the categories of ethnicity used on the annual homelessness form with effect from 1 April 2013 for the 2012-13 financial year.

- 88 per cent of respondents were content for the re-ordering and renaming of priority need categories in Table 3 of both the quarterly and annual return and the extension of guidance to cover those households accepted as homeless where the applicant has been granted 'Leave to Remain' under immigration legislation. 12 per cent did not agree with this proposal.

**Decision:** We will make the proposed changes to the priority need categories in Table 3 of the quarterly and annual form. Concerns were expressed about the extra work involved in changing existing reporting processes to match the new order however generally it was considered that these changes will provide clarity, prevent confusion and simplify completion.

- 88 per cent of respondents agreed with the proposal to add the categories 'current property unaffordable' and 'current property unsuitable' to Table 4 of both the quarterly and annual return which covers the main reason for loss of home. 12 per cent disagreed.

**Decision:** We will add these two new categories to Table 4 of both the quarterly and annual return. There were concerns that the category 'current property unsuitable' was not specific enough and that the category 'current property unaffordable' could cause inaccurate recording because of the overlap with the existing categories relating to arrears. To address these concerns we will ensure that the accompanying guidance specifies what should be included under both these categories and we will add the suffix (not in arrears) to 'Current Property Unaffordable' to avoid confusion with other categories relating to arrears.

- 88 per cent of respondents agreed with the proposal to add a more detailed breakdown of those cases where the main reason for loss is violence or harassment in Table 4 of both the quarterly and annual return to include violence or harassment which is:
  - Racially motivated
  - Due to religion/belief
  - Due to gender reassignment (gender identity)
  - Due to sexual identity/orientation
  - Due to disability
  - Other

12 per cent of respondents disagreed.

**Decision:** We will make the changes as outlined above. Concerns were raised about lack of relevance due to the limited number of such cases however the requirements of the Equality Act 2010 cover all service providers, employers and public authorities regardless of size and the information aggregated to a Wales level would be valuable in monitoring trends even though these may not be as obvious at an individual authority level. Concerns were also raised about the difficulty in getting objective and consistent information and about the issue of confidentiality. To address this we will ensure that the guidance provided will help to ensure consistency of approach to each case by data providers and the disclosure rules which already apply to the publication of homelessness data should prevent a risk to the confidentiality of individuals by ensuring that all the figures published are rounded independently to the nearest 5 to protect the identity of individuals.

- 76 per cent of respondents agreed with the proposal to introduce a new twice yearly data collection covering the actions taken by local authorities in preventing homelessness and in relieving homeless where it cannot be prevented as soon as data collection and processing resources within the Welsh Government allow. 24 per cent did not agree with this proposal.
- **Decision:** We will introduce a new data collection covering homelessness prevention and relief as and when resources within the Welsh Government allow. There were a number of concerns expressed however including:
  - the need to wait for the review of homelessness legislation in Wales to be completed before implementing the new collection.
  - the impact of this extra data collection on existing work loads and already stretched resources within authorities
  - concerns as to how consistent the information collected would be with the National Strategic Indicator (NSI) HHA013 as there were recognised discrepancies in the processing and reporting of this information currently
  - concern that asking for information on homelessness relief may cause confusion as this is not currently required for NSI HH013.

To address the concerns raised we will wait until the review of the homelessness legislation has been completed before finalising exact data requirements for this collection so that any recommendations in relation to the recording of homelessness prevention can be considered. Whilst exact timings have yet to be confirmed the new Housing Bill will be implemented from 2014 onwards. We will liaise further with both data providers and end users of the information to ensure that we only collect the information which is needed and will be used and limit as much as possible the burden on data providers. We will ensure that the definitions and accompanying guidance for the data collection returns are clear, particularly in relation to homelessness relief, and are consistent where applicable with the information provided by NSI HH013. Once a firm decision has been made on the date for implementing the new collection we will ensure that local authority data providers are given sufficient notice to make the necessary changes to their systems and to familiarise themselves with the new form, definitions and guidance.

- 76 per cent of respondents agreed with proposal to include cases, in a proposed new data collection on homeless prevention and relief, where a person applies directly to a partner organisation which is funded by a local housing authority to assist in the prevention or relief of homelessness as well as recording cases where a person seeks help from a local authority. 24 per cent disagreed with this proposal.

**Decision:** We will include cases where a person applies directly to a partner organisation funded directly by the local authority within the new collection on homelessness prevention and relief as and when it is introduced. The information would usefully provide a much broader picture of all homelessness prevention activity within each authority. There were some concerns expressed about the impact on staff time and resources within authorities particularly where a number of different organisations are involved. We will address this through further liaison with both data providers and end users to ensure we only collect the data that is required, relevant and will be used in order to limit the burden on data providers in a time of limited resources.

Following this consultation and further consideration of some of the issues raised the decision has been taken to:

- Make the changes outlined above to the current quarterly and annual homelessness data collection returns with effect from 1 April 2012.
- Consider the introduction of a new collection covering the actions taken by local authorities to prevent or relieve homelessness as and when the data collection and processing resources within the Welsh Government allow.

Following implementation the Welsh Government will continually monitor and review the impact of these changes to ensure users needs continue to be met and that the quality of information published is not adversely affected.

## Introduction

A summary of the background to the consultation is provided in this report. The full background to the consultation is available in the consultation document:

<http://wales.gov.uk/consultations/statistics/homelessness/?lang=en&status=closed>

Homelessness statistics are one of our highest profile housing outputs but the homelessness data collection return had not been reviewed since April 2002. Concerns had been raised regarding the continuing relevance and accuracy of some of the information collected. The current quarterly homelessness return does not include any information on actions taken by local authorities in relation to homelessness prevention and relief. Local authorities carry out a significant amount of work in this area which is not being recorded centrally. Although there is a national performance indicator on prevention, this does not provide sufficient detail on the type and level of homelessness prevention work being carried out by authorities across Wales and there have been issues in relation to the accuracy and completeness of the data.

In the autumn of 2010 a sub group of the Housing Information Group (HIG) was established to review the statutory homelessness data items collected and their associated guidance as well as other topic areas including homelessness prevention. The group included internal Welsh Government colleagues as well as external representatives from local authorities and other relevant housing and homelessness agencies. The review process identified a number of changes which could be made to the current quarterly homelessness data collection form which would ensure that the information collected and published on statutory homelessness remains relevant, accurate and meets the needs of users. Some of the changes identified including changing the frequency of collection and publication of some data items from quarterly to annual and other specific changes have already been consulted on as part of the consultation on 'Proposed Changes to Housing Data Collections' which ended on 15 July 2011. These changes were agreed following consultation and were implemented for the 2011-12 financial year. Further details are available at the following link:

<http://wales.gov.uk/consultations/statistics/housingdata/?lang=en&status=closed>

It was however recognised that other proposed changes to the current data collection return would, if accepted, require a longer lead in time to allow the local authority data providers sufficient time to make the required changes to their internal data processing systems. These changes form part of this consultation and if accepted will be implemented for the 2012-13 financial year.

A consultation was held, in accordance with the Official Statistics Code of Practice, to allow users to comment on these other proposed changes to the data collection returns as well as the introduction of a new data collection covering the actions taken by local authorities to prevent and relieve homelessness. The proposals in this consultation have already been agreed in principle by the Housing Information Group (which represents the views of a range of stakeholders) and by its homelessness sub-group. The consultation was therefore open for a period of 6 weeks rather than the more usual 12 week period, from 5 December 2011 to 16 January 2012. As the consultation covered the Christmas holiday period the deadline was subsequently extended to 1 February 2012. The rationale for the proposed changes was included in the consultation documents which were published via the website.

## Methods

Respondents were asked if they agreed with the proposed changes to the homelessness data collections as well as the introduction of a new data collection covering homelessness prevention and relief. The questions used in the consultation are attached in the Annex.

The background document explaining the consultation and the response form were accessible via the Welsh Government consultations website. Emails to a wide group of potential users of housing statistics were sent out inviting response to the consultation. These included devolved and central government, local government, housing associations, third sector organisations, various housing

bodies and housing networks. Responses were received in Excel response forms or as emailed comments.

## Results

18 responses to the consultation were received, 14 using the Excel response form and 4 in the form of an e-mail. Of the 18 respondents, 11 stated that they were happy to be identified in this report and they are listed in Annex A. The number and percentage of responses by type of organisation and a summary of the responses are provided in the following tables:

<b>Organisation</b>	<b>Number of responses</b>	<b>Percentage of responses</b>
Local Authority	13	72%
Registered Social Landlord (a)	3	17%
Other Third Sector	2	11%
<b>Total</b>	<b>18</b>	<b>100%</b>

(a) RSLs are classed as third sector organisations

<b>Question</b>	<b>Yes</b>	<b>No</b>	<b>Did Not Respond</b>	<b>Total</b>
Q1. Agree with the proposal to change categories of ethnicity in line with the 2011 Census classifications?	17	0	1	18
<b>% of responses to this question</b>	<b>100%</b>	<b>0%</b>		<b>100%</b>
Q2. Agree with the proposal to re-order and rename some of the priority need categories and extend the guidance for cases where the applicant has been granted 'Leave to Remain' under immigration legislation.	15	2	1	18
<b>% of responses to this question</b>	<b>88%</b>	<b>12%</b>		<b>100%</b>
Q3. Agree with the proposal to add two new categories of main reason for loss of home: ➤ Current property unaffordable ➤ Current property unsuitable	15	2	1	18
<b>% of responses to this question</b>	<b>88%</b>	<b>12%</b>		<b>100%</b>
Q4. Agree with the proposal to include a more detailed breakdown for cases where the main reason for loss is violence or harassment: ➤ Racially motivated ➤ Due to religion/belief ➤ Due to gender reassignment (gender identity) ➤ Due to sexual identity/orientation ➤ Due to disability ➤ Other	15	2	1	18
<b>% of responses to this question</b>	<b>88%</b>	<b>12%</b>		<b>100%</b>
Q5. Agree with the proposal to introduce a new twice yearly data collection covering the actions taken by local authorities in preventing homelessness and in relieving homeless where it cannot be prevented as and when data collection and processing resources within the Welsh Government allow.	13	4	1	18
<b>% of responses to this question</b>	<b>76%</b>	<b>24%</b>		<b>100%</b>
Q6. Agree with proposal to include cases where a person applies directly to a partner organisation which is funded by a local housing authority to assist in the prevention or relief of homelessness as well as recording cases where a person seeks help from a local authority.	13	4	1	18
<b>% of responses to this question</b>	<b>76%</b>	<b>24%</b>		<b>100%</b>

The following pages give more detail on the responses provided to each of these questions.



### **Question 1.**

**Do you agree with the proposal to change categories of ethnicity used in the table 2 of the annual return – ‘Households for which decisions were taken by ethnic group of applicant’ - in line with the 2011 Census classifications?**

### **What are your reasons for this, including any impact this change might have on your work?**

There were 17 responses received in relation to this question. Of these, 17 (100 per cent) agreed with the proposal. The comments provided in these responses included the following:

- “Offers uniformity when comparing data.”
- “Greater clarity of diversity within applications. This would enable more effective monitoring and projection of needs within minority groups.”
- “It makes sense to allow comparability between Census data and homelessness data. We feel the proposed categories are more specific and would allow, for example, a closer focus on homelessness among different groups such as Gypsy Travellers.”
- “Agreed that the link between the census and recording of information makes the use of statistical information more relevant.”

### **Discussion**

All of those who responded to this proposal were in favour of changing the categories of ethnicity used on the homelessness return in line with the 2011 Census classifications. Changing the categories used on the annual homelessness return will ensure comparability and consistency with 2011 Census data and with other official statistical data sets which contain ethnicity information. Most respondents stated this would have minimal impact on their workload and welcomed the comparability it would provide.

### **Conclusion**

We will change the categories of ethnicity shown on Table 2 of the annual homelessness data collection form in line with the 2011 Census classifications, shown in Annex B, with effect from **1 April 2012 to cover the 2012-13 financial year.**

### **Question 2.**

**Do you agree with the proposal to change Table 3 of both the annual and quarterly return - ‘Households found to be eligible for assistance, unintentionally homeless and in priority need as follows:**

- **Re-order and rename some of the priority need categories as shown in the draft data collection return attached for reference.**
- **Extend the guidance relating to the recording of those households accepted as homeless where the applicant has been granted ‘Leave to Remain’ under immigration legislation.**

### **What are your reasons for this, including any impact this change might have on your work?**

There were 17 responses received in relation to this question. Of these, 15 (88 per cent) agreed with the proposal to re-order and rename some of the priority need categories in Table 3 of the quarterly and annual homelessness data collection form and to extend the guidance relating to those applicants granted ‘Leave to Remain’ under immigration legislation.

The comments provided in these responses included:

- “Provides clarity for those cases currently recorded in ‘other’.”
- “Greater clarity and identification of previously un-named categories of priority need is welcomed as this will enable better monitoring and mapping of need within the groups.”

- Taking steps to avoid over-use of the 'other' category will result in more accurate recording of priority need and help us to gain a more in-depth understanding of the nature of homelessness in Wales.

There were 2 respondents who did not agree with the proposal and the reasons given were as follows:

- "The current table is not confusing and our IT systems have been set up to complete it in its current form. The change in the order of the categories will mean reports will need to be changed to match the new order. There seems to be little reason for changing the order - the information gathered is still the same. "
- "No- do not agree to the changes to the vulnerable categories i.e. long term illness and learning difficulties."

## Discussion

The majority of respondents were in favour of the proposed changes to the order and naming of the priority need categories and to the provision of extra guidance. During the review some data providers had reported the current layout of the table to be confusing and difficult to complete accurately. Some priority need categories such as long term illness and learning difficulties were not specifically covered which forced data providers to use the 'Other' category. These changes will provide clarity, prevent confusion and simplify completion and will ensure the provision of more complete and accurate data in relation to the priority need categories of households accepted as homeless.

## Conclusion

Having assessed the views of respondents the decision has been taken to go ahead with changes to the priority needs categories in Table 3 of the homelessness data collection form and to extend the guidance relating to those relating to those applicants granted 'Leave to Remain' under immigration legislation. A copy of draft data collection return is attached for reference. These changes will be introduced for the **April to June quarter 2012 onwards**.

## Question 3.

**Do you agree with the proposal to add two new categories of main reason for loss of home in Table 4 of both the quarterly and annual return which covers 'main reason for loss of last settled home' as follows:**

- **Current property unaffordable**
- **Current property unsuitable**
- **Provide guidance and definitions for these two new categories.**

## **What are your reasons for this, including any impact this change might have on your work?**

There were 17 responses received in relation to this question. Of these, 15 (88 per cent) agreed with the proposal to add two new categories to Table 4 and to provide definitions and guidance for these categories. The comments provided in these responses included:

- "I feel that it is really important that this information is collated to monitor the impacts of welfare reform on homelessness."
- "I agree with this proposal as with the proposed welfare reforms, we are already seeing an increase in numbers which are affected by affordability issues. Mortgage repossessions and NTQ's are increasing and this again has serious implications as arrears are a major problem area in securing more settled accommodation for households approaching the Authority. There are also concerns around numbers of properties which are suitable for single households again raising concerns on the possible future numbers which are expected to present as Homeless."

- “This will enable reasons for homelessness to be recorded more accurately. People do not always wait until they are heavily in arrears before abandoning accommodation and this should be reflected in data collection.”
- “Provides clarity for those cases currently recorded in 'other'.”

Two respondents did not agree with the proposal for the reasons outlined below:

- “Yes - to adding current property unaffordable. No - do not agree to adding current property unsuitable - it's too open ended.
- The addition of the category of "current property unsuitable" is appropriate but will cause significant changes to recording and reporting. It is not agreed with the addition of the "current property unaffordable" as suggested. The description of the category as it stands could cause inaccurate recording because it will overlap with the existing categories relating to arrears. Arrears and un-affordability are both closely related. The description could be amended to be "Current Property Unaffordable - not in arrears."

## Discussion

The majority of respondents agreed with the proposal to add these two extra categories for main reason of loss home in Table 4 of both the quarterly and annual data collection return.

During the review process a number of data providers reported an increasing number of cases where a person will present as homeless as a result of not being able to afford their home and have taken action before rent or mortgage arrears are incurred and eviction or repossession notices have been issued. There has also been a recognised increase in the number of cases where a person will present as homeless because their current accommodation was no longer suitable such as those returning from hospital. Currently these cases would need to be recorded in the 'Other' row and relevant comments provided. Respondents generally felt this addition would have minimal impact on resources and would provide more comprehensive and accurate data on reasons for loss of home and improve the overall understanding of the causes of homelessness.

In the light of comments received however and to ensure that there is no conflict between the different categories of main reason for loss of home we will add the suffix (not in arrears) to the category 'Current Property Unaffordable' and provide clear guidance as to what should be included within this category.

## Conclusion

The two extra categories 'Current property unaffordable (not in arrears)' and 'Current property unsuitable' -will be added to Table 4 of the quarterly and annual data collection return and relevant guidance provided. These changes will be introduced for the **April to June quarter 2012 onwards**.

## Question 4.

**Do you agree with the proposal to change table 4 of both the quarterly and annual return which covers 'main reason for loss of last settled home' by including a more detailed breakdown of those cases where the main reason for loss is violence or harassment as follows:**

**Violence or harassment which is:**

- **Racially motivated**
- **Due to religion/belief**
- **Due to gender reassignment (gender identity)**
- **Due to sexual identity/orientation**
- **Due to disability**
- **Other**

**What are your reasons for this, including any impact this change might have on your work?**

There were 17 responses received in relation to this question. Of these, 15 (88 per cent) were in favour and 2 (12 per cent) were not. Comments from those who approved the proposal included:

- “Fits with the 'protected characteristics' of Equality Act 2010. This will require a change to the categories of 'violence or harassment' on our Homelessness Database but will have no ongoing impact on the way we work.”
- “We anticipate this would have minimal administrative impact on local authorities and we agree that it is a good way to respond to the requirements of the Equality Act 2010 without imposing additional work burdens.”
- “It will help identify whether hate crime or harassment has caused the homelessness. No impacts identified.”

Comments provided by respondents who opposed the proposal included:

- “Each case could involve highly subjective judgment on an individual by individual basis. Consistency would be very difficult. There may also be a confidentiality issue which applicants may not want to be disclosed. We have concerns that in seeking detail we do not go too far and risk losing sight of the bigger picture of homelessness in Wales.”
- “This is not really relevant for our Local Authority - the breakdown would not really show any trend or help with our data assessment.”

## Discussion

The majority of respondents agreed with the proposal to include a more detailed breakdown of the cases where the main reason for loss is violence or harassment in line with the 2010 Equalities legislation.

The current homelessness return already collects information on some of the nine protected characteristics defined under the 2010 Equality Act such as age, gender and ethnicity. Data on other protected characteristics including religion, gender reassignment and sexual orientation are not currently collected but these could be one of the main reasons for the person becoming homeless. A number of respondents recognised that extending the table to monitor the causes of violence or harassment, leading to loss of home, in conjunction with the protected characteristics would ensure that authorities are implementing their public sector equalities duties, enable the data gaps to be filled without over burdening data providers and provide valuable information for developing homelessness prevention policies

Only two respondents were opposed to this proposal citing concerns over confidentiality and lack of relevance for their authority due to the limited number of such cases. In response to the first concern, we already collect and publish homelessness information in relation to some of the nine protected characteristics and the guidance provided will help to ensure consistency of approach to each case by data providers. The disclosure rules which already apply to the publication of homelessness data should prevent a risk to the confidentiality of individuals by ensuring that all the figures published are rounded independently to the nearest 5 to protect the identity of individuals and an asterisk shown when the data item is deemed disclosive. In response to the second concern we would emphasise that the requirements of the Equality Act 2010 cover all service providers, employers and public authorities regardless of size and the information aggregated to a Wales level would be valuable in monitoring trends even though these may not be as obvious at an individual authority level.

## Conclusion

Having assessed the views of all respondents, including those opposing the proposal, it has been decided that the from **1 April 2012 onwards** Table 4 of the homelessness data collection return will be extended to include a more detailed breakdown of those cases where the main reason for loss is violence or harassment as outlined above.

#### **Question 5.**

**Do you agree with the proposal to introduce a new twice yearly data collection covering the actions taken by local authorities in preventing homelessness and in relieving homeless where it cannot be prevented as soon as data collection and processing resources within the Welsh Government allow?**

**What are your reasons for this, including any impact this change might have on your work?**

*A copy of the draft data collection return is attached for reference. This will provide information on the following:*

- *The total number of cases where positive action by the authority succeeded in preventing homelessness for at least 6 months and a breakdown of the types of action taken to enable the household to remain within their existing home.*
- *The total number of cases where positive action by the authority succeeded in relieving homelessness where homelessness could not be prevented and a breakdown of the types of alternative accommodation obtained by the authority for these households.*
- *The total number of cases where positive action by the authority did not succeed in preventing homelessness for at least 6 months and the reasons why.*
- *The total number of cases where positive action by the authority did not succeed in relieving homelessness where homelessness could not be prevented.*

There were 17 responses to this question. Of these, 13 (76 per cent) agreed with the proposal and 4 (24 per cent) did not. Comments from those who approved the proposal included:

- "Will finally have the data available nationally the prevention and relief data that is currently undertaken by each LA- we already collect this data so impact on workload."
- "Just amalgamates Homelessness/Prevention data already collected and allows more effective benchmarking."
- "We feel that the recording of positive action will only benefit the person who is presenting as homeless."
- "Whilst agreeing with the introduction of this new data collection process it can not be underestimated that there will be considerable amount of work required for this Authority in order to introduce these changes- With this in mind a greater lead in time to plan for such changes would be welcomed."
- "We feel it is important for more in-depth information to be recorded for this part of our service."
- "We feel that comparisons with England, and Scotland would be helpful. The more qualitative information the better, especially the longer-term outcomes of alleviating homelessness."

Comments provided by respondents who opposed the proposal included:

- "With the discrepancies in reporting widely accepted, it may be better to wait for the review of legislation in Wales to be completed prior to adding this new report."
- "Whilst agreeing in principle that this data needs to be collected, there should be a longer lead in time. This will have a significant impact on the service."
- "While the introduction of a twice yearly data collection for homelessness prevention would be welcomed and the prevention approach is fully endorsed, there are concerns regarding the

shifting of finite resources towards relieving homelessness for households found to be intentionally homeless and non-priority need.”

- “I agree in principle that adding data on prevention work is appropriate for the return. The nature of the collection sheet however causes me some concern due to its complexity and in particular the addition of the principle of ‘Homelessness relieved’. - To change our recording systems to add the reasons for prevention and to build new reports to provide the data proposed requirements would mean very substantial work on behalf of the authority. “

## Discussion

The majority of respondents agreed with the proposal to introduce a new data collection covering homelessness prevention and relief and felt it would provide a useful method of recording the extensive work already being undertaken by authorities in this area. There were a number of concerns expressed however both by those who agreed in principle with the proposal as well as those who were not in favour. These concerns included:

- The impact of this extra data collection on existing work loads and already stretched resources within some authorities and the need for a longer lead in time. There were particular concerns about the guidance stipulating that each prevention case should be "verified by a senior officer or other officer" which would be extremely resource intensive and time consuming for some authorities.
- There were concerns as to how consistent the information collected would be with the National Strategic Indicator (NSI) HHA013 as there were recognised to be significant issues in how the HHA013 is currently recorded and interpreted by different local authorities across Wales. Also currently local authorities are only required to provide information on homelessness prevention for the NSI HH013 and some respondents were concerned that the homelessness relief part of the questions could cause confusion.
- There were concerns over the reporting of cases where prevention was unsuccessful with some respondents regarding this as not required and others stating that the recording of unsuccessful cases needs to be “considerably broadened”.
- The possibility of legislative reform in the Housing Bill, which may include legislation on homelessness prevention, was also seen as an issue. Some respondents felt that the new data collection should be introduced as soon as possible so that this is not held up the legislative process while others felt that may be better to wait for the review of legislation to be completed prior to introducing it.

## Conclusion

The majority of respondents were in favour of introducing a new data collection covering homelessness prevention and relief as a means of centrally recording the extensive work already being carried out by local authorities. The Welsh Government is committed to preventing homelessness wherever possible as outlined in the [‘Ten Year Homelessness Plan for Wales’](#) and the [Programme for Government](#) but has currently no way of centrally monitoring the effectiveness of this policy apart from the NSI HHA/013. Whilst this indicator records the percentage of all potentially homeless households for whom homelessness was prevented for at least 6 months but does not provide any detail of the actions taken by the individual local authorities and there have been issues in relation to the accuracy and completeness of the data. If introduced the data collection would allow comparisons with England and Scotland who already have in place regular annual collections covering homelessness prevention and relief.

The concerns about the impact on resources both for data providers and for the Welsh Government data collection team however have to be considered as well as the need to resolve some of the other issues raised by this consultation in relation to definitions and coverage. Consideration also needs to be taken in respect of the forth coming Housing Bill and its possible

impact on homelessness prevention legislation. It has therefore been decided to delay the introduction of a new data collection on homelessness prevention and relief until resources are available within the Welsh Government data collection team and to allow further clarification of data requirements, definitions and guidance as well as any recommendations in relation to the recording of homelessness prevention which come from the review of homelessness legislation currently being undertaken.

#### **Question 6.**

**Guidance Note 106 (a) of the [proposed new] data collection form states that ' As well as recording cases where a person seeks help from a local authority, please also include cases where a person applies directly to a partner organisation which is funded by a local housing authority to assist in the prevention or relief of homelessness. Do you agree that these cases should be included?**

There were 17 responses to this question. Of these, 13 (76 per cent) agreed with the proposal and 4 (24 per cent) did not. Comments from those who approved the proposal included:

- “Yes this will give a broader reflection of the current situation.”
- “Inclusion of these figures will assist in mapping the actual need within the County.”
- “We agree these cases should be included and as one such partner organisation we would welcome the opportunity to feed our work into the data collection process - if the Welsh Government intends to incorporate data from stakeholders it may be necessary to carry out a review to assess what additional work may be required to facilitate this process.”

Comments provided by respondents who opposed the proposal included:

- “This may cause problems in gathering the data for submission as these agencies are notoriously difficult to gather information from and would in turn involve a considerable amount of time from the officer who submits data for Welsh Government.”
- “We refer people to other organisations however we would not be able to provide detailed information on what happened when this person left our authority. The organisations may well be able to provide this information but this would need to be provided by them in its entirety not through our authority.”
- “It would be difficult to get data from a third party, especially when more than one organisation is involved.”

#### **Discussion**

Most respondents were in favour of extending the coverage of prevention to include cases where a person applies for assistance directly to a partner organisation funded by the local authority. This would provide a broader picture of all homelessness prevention activity within each authority. However, concerns were raised by some authorities about the difficulties in collecting and collating this information in particular the impact on staff time and resources within authorities especially where a number of different organisations are involved. Some respondents suggested that the data be collected by the Welsh Government directly from the organisations concerned though this would equally impact on staff time and resources within the data collection team.

#### **Conclusion**

The broader coverage provided by including the activity of partner organisations funded directly by local authorities would provide useful information and should be included though issues still remain as to the best method for capturing this information without overburdening data providers. As it has already been decided to put the introduction of the homelessness prevention data collection on hold this will allow further time to investigate how these issues can be resolved.

## General comments

Respondents were also asked to provide comments on any related issues which were not specifically addressed by questions 1 to 6 of the consultation form.

Comments received included the following:

- “We feel that with the prevention cases the following categories need including as they have a high number of applications which would fall under them. 1. Customer has Moved Out Of Area 2. Customer Resolved Own Housing Issues 3. Bought Own Property (especially due to the Local Authority Mortgage availability.) Also there is no where to record applicants who have stayed in their own home as a result of DHP.”

These concerns will be looked at as part of a further general review of the data items we propose to collect prior to the introduction of a new collection covering homelessness prevention and relief. The exact timing for this has not yet been confirmed as it will depend on the availability of resources within the Welsh Government central data collection team as well as the outcome of other factors such as the impact of the forthcoming Homelessness legislation changes.

- “On balance the changes are greatly welcomed, however, in order to successfully introduce and implement the improvements it will require sufficient resources to be set aside with a lead in time to match.”

The changes to the data collection form are planned for implementation for the 2012-13 financial year with the first revised quarterly data collection forms issued at the end of June 2012. All data providers will be notified of the exact changes prior to 1 April 2012.

- “We feel that more information relating to the Welfare Reforms would be beneficial to this report. With the changes to Housing Benefit taking effect, we feel that this will impact greatly on the number of households approaching their Authority for assistance will increase significantly across Wales.”

It is not part of the remit of this consultation to provide information relating to Welfare Reforms but any significant increases in the number of homelessness applications will be monitored and analysed via the regular homelessness statistical outputs taking into account all possible factors which may impact on the level of homelessness shown by the data provided by authorities across Wales.

- “We would like to make a final general comment about the WHO12 data collection process. We understand from listening to local authorities that the WHO12 collection can be an onerous burden on resources. “ “Additionally we – have frequent information requirements that WHO12 data cannot currently meet because they do not allow cross-referencing between the different tables” -. “If the Welsh Government invested in some software to facilitate collection of homelessness data this would simultaneously relieve the work burden on local authorities while opening up a much more detailed understanding of the nature of homelessness in Wales today by allowing cross-referencing”

While we are aware of the limitations of the data currently collected we also need to take into account the burden on local authority data providers and the impact on resources both at a central and local government level caused by the current economic climate. This makes the possibility of large scale investment in new technology and software across all Welsh authorities unlikely at present.

## Conclusion

Having considered all the information gathered during the consultation and the views of members of the Housing Technical Information Group and the Homelessness Sub Group, it has been



decided to go ahead with all the proposed changes to both the quarterly and annual homelessness data collection returns with effect from 1 April 2012.

The changes outlined below will be implemented for data collections that cover the 2012-13 financial year onwards:

- The ethnicity categories shown in Table 2 of the annual homelessness return for 2012-13 will be changed in line with the 2011 Census classifications (see Annex B) The annual data collection form will be issued in April 2013 to cover the 2012-13 financial year.
- Some of the priority need categories in Table 3 of both the quarterly and annual homelessness return will be re-named and re-ordered for the April to June quarter 2012 onwards and the guidance relating to applicants granted 'Leave to Remain' under immigration legislation will be extended. A copy of the draft data collection return is attached for reference. The quarterly form for April to June 2012 will be issued in July 2012
- Two new categories of main reason for loss of home:
  - Current property unaffordable
  - Current property unsuitablewill be added to Table 4 of both the quarterly and annual return for the April to June quarter 2012 onwards and definitions and guidance provided. A copy of the draft data collection return is attached for reference. The quarterly form for April to June 2012 will be issued in July 2012
- A more detailed breakdown of those cases where the main reason for loss is violence or harassment will be required in Table 4 of both the quarterly and annual return for the April to June quarter 2012 onwards.  
The new breakdown will include violence or harassment which is:
  - Racially motivated
  - Due to religion/belief
  - Due to gender reassignment (gender identity)
  - Due to sexual identity/orientation
  - Due to disability
  - Other

The guidance will be extended to cover the new breakdown. A copy of the draft data collection return is attached for reference. The quarterly form for April to June 2012 will be issued in July 2012

Following implementation the Welsh Government will continually monitor and review the impact of these changes to ensure users needs continue to be met and that the quality of information published is not adversely affected.

#### Homelessness Prevention and Relief:

The introduction of a new twice yearly collection covering homelessness prevention and relief will be put on hold until resources within the Welsh Government data collection team allow and to allow further investigation and consideration of the issues raised during the consultation including:

- Concerns about the impact on resources for data providers
- Issues raised in relation to definitions, guidance and coverage.
- The forthcoming Housing Bill, which will be implemented from 2014 onwards, and its possible impact on homelessness prevention legislation
- Recommendations in relation to the recording of homelessness prevention which come from the review of homelessness legislation currently being undertaken.

Both data providers and end users of the information will be kept informed of any future developments.

## ANNEX A

### Questions asked

Name

Organisation

Job Title

Email address

Do you wish to be identified as the author of your response? (mandatory question)

Q1. Do you agree with the proposal to change categories of ethnicity used in the table 2 of the annual return – ‘Households for which decisions were taken by ethnic group of applicant’ - in line with the 2011 Census classifications?

What are your reasons for this, including any impact this change might have on your work?

Q2. Do you agree with the proposal to change Table 3 of both the annual and quarterly return - ‘Households found to be eligible for assistance, unintentionally homeless and in priority need as follows:

- Re-order and rename some of the priority need categories as shown in the draft data collection return attached for reference.
- Extend the guidance relating to the recording of those households accepted as homeless where the applicant has been granted ‘Leave to Remain’ under immigration legislation.

What are your reasons for this, including any impact this change might have on your work?

Q3. Do you agree with the proposal to add two new categories of main reason for loss of home in Table 4 of both the quarterly and annual return which covers ‘main reason for loss of last settled home’ as follows:

- Current property unaffordable
- Current property unsuitable
- Provide guidance and definitions for these two new categories.

What are your reasons for this, including any impact this change might have on your work?

Q4. Do you agree with the proposal to change table 4 of both the quarterly and annual return which covers ‘main reason for loss of last settled home’ by including a more detailed breakdown of those cases where the main reason for loss is violence or harassment as follows:

Violence or harassment which is:

- Racially motivated
- Due to religion/belief
- Due to gender reassignment (gender identity)
- Due to sexual identity/orientation
- Due to disability
- Other

What are your reasons for this, including any impact this change might have on your work?

Q5. Do you agree with the proposal to introduce a new twice yearly data collection covering the actions taken by local authorities in preventing homelessness and in relieving homelessness where it cannot be prevented as soon as data collection and processing resources within the Welsh Government allow?

What are your reasons for this, including any impact this change might have on your work?

Q6. Guidance Note 106 (a) of the data collection form states that ' As well as recording cases where a person seeks help from a local authority, please also include cases where a person applies directly to a partner organisation which is funded by a local housing authority to assist in the prevention or relief of homelessness. Do you agree that these cases should be included?

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

**List of responders** (*who stated that they were happy to be identified*)

<b>Name</b>	<b>Organisation</b>
Richard McQuillan	Hafod Housing Association
Neil Moffatt	Clwyd Alyn Housing Association
Kieran Towler	United Welsh
Dafydd Evans	Powys County Council
Geoff Walker	Bridgend County Borough Council
Laura Hughes	Pembrokeshire County Council
Carol Martin	Ceredigion County Council
Simon Turner	Newport Council
Jackie Evans	Merthyr Tydfil CBC
Sam Smith	Flintshire County Council
Jennie Bibbings	Shelter Cymru

## Annex B – Proposed changes to the ethnicity categories used on the annual homelessness return

We propose to replace the ethnicity categories currently used on the annual homelessness return with those used in the 2011 Census form –The table below shows both versions.

Current ethnicity categories used on annual homelessness return	2011 Census ethnicity categories
<p>White:</p> <ul style="list-style-type: none"> <li>White British</li> <li>White Irish</li> <li>Any other white background</li> </ul> <p>Mixed:</p> <ul style="list-style-type: none"> <li>White and black Caribbean</li> <li>White and black African</li> <li>White and Asian</li> <li>Any other mixed background</li> </ul> <p>Asian or Asian British:</p> <ul style="list-style-type: none"> <li>Indian</li> <li>Pakistani</li> <li>Bangladeshi</li> <li>Any other Asian background</li> </ul> <p>Black or Black British:</p> <ul style="list-style-type: none"> <li>Caribbean</li> <li>African</li> <li>Any other black background</li> </ul> <p>Chinese or any other ethnic group</p> <ul style="list-style-type: none"> <li>Chinese</li> <li>Other</li> </ul> <p>Ethnic origin not known</p>	<p>A White:</p> <ul style="list-style-type: none"> <li>Welsh / English / Scottish / Northern Irish / British</li> <li>Irish</li> <li>Gypsy or Irish Traveller</li> <li>Any other White background</li> </ul> <p>B Mixed / multiple ethnic groups</p> <ul style="list-style-type: none"> <li>White and Black Caribbean</li> <li>White and Black African</li> <li>White and Asian</li> <li>Any other Mixed / multiple ethnic background</li> </ul> <p>C Asian / Asian British</p> <ul style="list-style-type: none"> <li>Indian</li> <li>Pakistani</li> <li>Bangladeshi</li> <li>Chinese</li> <li>Any other Asian background</li> </ul> <p>D Black / African / Caribbean / Black British</p> <ul style="list-style-type: none"> <li>African</li> <li>Caribbean</li> <li>Any other Black / African / Caribbean background</li> </ul> <p>E Other ethnic group</p> <ul style="list-style-type: none"> <li>Arab</li> <li>Any other ethnic group,</li> </ul>