



WOKINGHAM BOROUGH COUNCIL

A Meeting of an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in the Council Chamber - Civic Offices, Shute End, Wokingham RG40 1BN on **MONDAY 22 AUGUST 2022 AT 12.30 PM**

Susan Parsonage
Chief Executive
Published on 12 August 2022

Note: Non-Committee Members and members of the public are welcome to attend the meeting or participate in the meeting virtually, in line with the Council's Constitution. If you wish to participate either in person or virtually via Microsoft Teams please contact Democratic Services. The meeting can also be watched live using the following link:
<https://youtu.be/V5cT2CAK9rE>

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WOKINGHAM BOROUGH COUNCIL

Our Vision

A great place to live, learn, work and grow and a great place to do business

Enriching Lives

- Champion outstanding education and enable our children and young people to achieve their full potential, regardless of their background.
- Support our residents to lead happy, healthy lives and provide access to good leisure facilities to complement an active lifestyle.
- Engage and involve our communities through arts and culture and create a sense of identity which people feel part of.
- Support growth in our local economy and help to build business.

Safe, Strong, Communities

- Protect and safeguard our children, young and vulnerable people.
- Offer quality care and support, at the right time, to prevent the need for long term care.
- Nurture communities and help them to thrive.
- Ensure our borough and communities remain safe for all.

A Clean and Green Borough

- Do all we can to become carbon neutral and sustainable for the future.
- Protect our borough, keep it clean and enhance our green areas.
- Reduce our waste, improve biodiversity and increase recycling.
- Connect our parks and open spaces with green cycleways.

Right Homes, Right Places

- Offer quality, affordable, sustainable homes fit for the future.
- Build our fair share of housing with the right infrastructure to support and enable our borough to grow.
- Protect our unique places and preserve our natural environment.
- Help with your housing needs and support people to live independently in their own homes.

Keeping the Borough Moving

- Maintain and improve our roads, footpaths and cycleways.
- Tackle traffic congestion, minimise delays and disruptions.
- Enable safe and sustainable travel around the borough with good transport infrastructure.
- Promote healthy alternative travel options and support our partners to offer affordable, accessible public transport with good network links.

Changing the Way We Work for You

- Be relentlessly customer focussed.
- Work with our partners to provide efficient, effective, joined up services which are focussed around you.
- Communicate better with you, owning issues, updating on progress and responding appropriately as well as promoting what is happening in our Borough.
- Drive innovative digital ways of working that will connect our communities, businesses and customers to our services in a way that suits their needs.

For consideration by

Stephen Conway, Executive Member for Housing

Officers Present

Francesca Rowson, Policy Officer (Housing and Projects)

Callum Wernham, Democratic & Electoral Services Specialist

IMD NO.	WARD	SUBJECT	
IMD 2022/08	None Specific	HOMELESSNESS PREVENTION GRANT (2023/24 ONWARDS) CONSULTATION RESPONSE	5 - 22

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Agenda Item IMD8

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: IMD 2022/08

TITLE	Homelessness Prevention Grant (2023/24 onwards) Consultation Response
DECISION TO BE MADE BY	Deputy Leader of the Council and Executive Member for Housing - Stephen Conway
DATE, MEETING ROOM and TIME	22 August 2022 Council Chamber at 12:30pm
WARD	None Specific;
DIRECTOR / KEY OFFICER	Director, Place and Growth - Steve Moore

PURPOSE OF REPORT (Inc Strategic Outcomes)

To agree on Wokingham Borough Council's response to the Government's Homelessness Prevention Grant consultation for 2023/24 onwards, for submission by 26th August 2022. This consultation seeks feedback from local authorities and other relevant stakeholders regarding the Government's approach to the Homelessness Prevention Grant for the year 2023/24 onwards.

RECOMMENDATION

That the Executive Member for Housing authorises Wokingham Borough Council to respond to the Government's Homelessness Prevention Grant consultation for 2023/24 onwards, as set out in appendix 1 of the report.

SUMMARY OF REPORT

This report summarises the response which Wokingham Borough Council intends to submit to central government through its Homelessness Prevention Grant consultation. This response focuses on suggesting a way of allocating funding which accurately reflects the significant homelessness pressures in Wokingham Borough and which also recognizes (in the allocations formula) the numbers associated with early intervention success as well as private rented sector data.

Background

The Government's Homelessness Prevention Grant is intended to provide funding to local authorities to provide services which prevent and tackle homelessness in their local area. Wokingham Borough Council previously received an allocation of the grant for the year 2022/2023, and the consultation currently open is seeking views on the future of the grant from the year 2023/2024 onwards. The consultation is open till 26th August, and the Council proposes to submit a response to central government to reflect its experience relating to homelessness and funding pressures. This will ensure that the views of Wokingham Borough Council are conveyed to the Government regarding the future of this grant, in the light of ongoing work at the council to tackle homelessness, including early intervention where possible.

Business Case (including Analysis of Issues)

Given rising numbers of homelessness presentations and high demand for temporary accommodation in Wokingham Borough, it was proposed that Wokingham Borough Council should submit a consultation response to the Government giving the views and recommendations of WBC on the Homelessness Prevention Grant allocations for 2023 onwards. The Council's consultation response gives views which are based on the Council's experiences, both in terms of the demand on services and the successes of the Council in tackling the issue so far through early intervention and its own housing stock. The proposal for submission provides responses to those parts of the Government's consultation which are most pertinent for Wokingham Borough Council to submit views on, based on its experiences.

The Council's response to the Government's consultation focuses on the first section of the consultation, this being proposed amendments to the funding formula for the grant from 2023/24 onwards. This section will impact the Council the most, as the decision on a funding formula will determine how much Homelessness Prevention funding is received by WBC going forwards. WBC's proposed response answers questions which are posed, before giving comments on the reasoning behind its responses and making recommendations.

Among these comments, some key points which WBC's proposed consultation response intends to convey relate to the significant demand experienced in relation to homelessness presentations, which continues at the level seen during the pandemic, whereas formulae are based on pre-pandemic data; the nature of the homelessness presentation cases as varied and complex, which isn't fully reflected in the possible allocations formulae proposed by the Government; and the additional need to sustain tenancies when other local authorities (e.g. London Councils) place their residents into Wokingham Borough.

There is also a focus on the fact that the allocation formulae (as proposed by the Government) doesn't take into account early intervention data/successes, which mean that homelessness presentations in Wokingham aren't all taken into account as they do not involve a private rented sector end point. Therefore, local authorities are penalized in their grant allocation if they have taken active early prevention steps, as the existence of these presentations isn't included in the numbers used in the formula to calculate the grant allocations. The proposed consultation response recommends that H-CLIC (Homelessness Case Level Information Collection) data records this early prevention work in future.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces severe funding pressures, particularly in the face of the COVID-19 crisis. It is therefore imperative that Council resources are focused on the vulnerable and on its highest priorities.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	N/A (see below)	N/A	
Next Financial Year (Year 2)	N/A	N/A	
Following Financial Year (Year 3)	N/A	N/A	

Other financial information relevant to the Recommendation/Decision

The purpose of submitting a consultation response, as proposed in the first enclosure to this report, is to put forward to Government the views of Wokingham Borough Council on what the future of the Homelessness Prevention Grant should look like. Any financial implications of the recommendation are entirely dependent on whether central government chooses to adjust the method of allocations for the grant as a result of WBC submitting its views. There is no certainty that the views/recommendations of WBC will be reflected in the final decisions, however, any implications of our recommendation being taken up by central government would be positive financially for the Council. This is because our recommendations would mean an increase in funding allocation for WBC.

Cross-Council Implications

The decision to submit this consultation response to central government could have a positive impact on other related Council services, if it results in a greater funding allocation for Wokingham Borough based on the reasoning given in the consultation response proposal. This is because the funding pressure relating to homelessness and temporary accommodation would be alleviated to an extent, this extent being dependent on the specific increase in funding.

Public Sector Equality Duty

As part of this decision, due regard has been taken to the Public Sector Equality Duty. The equalities implications of the recommendation were discussed and an Initial Equality Impact Assessment document has been completed accordingly. A full equalities assessment is not required, due to the fact that the implications of the recommendation on the different groups with protected characteristics – in the event where our suggestions are implemented – would be either positive or neutral in each case.

SUMMARY OF CONSULTATION RESPONSES

Director – Resources and Assets	No comment received.
Monitoring Officer	No specific comments.
Leader of the Council	No comment received.

List of Background Papers
Proposed Homelessness Prevention Grant consultation response – Enclosure 1 Initial Equality Impact Assessment – Enclosure 2

Contact Francesca Rowson	Service Place Commissioning
Telephone No 0118 974 6000	Email francesca.rowson@wokingham.gov.uk

Online consultation Homelessness Prevention Grant 2023/2024

Introduction

This consultation is seeking input from local authorities and other interested stakeholders on five key proposals in relation to the Homelessness Prevention Grant:

- Updating the allocations formula so that it reflects current homelessness pressures
- Introducing transitional arrangements for changes to funding allocations
- Determining the timing of the announcements of 2023-24 and 2024-25 allocations, including a possible two-year funding allocation
- Adding a grant condition to require local authorities to submit additional spend declaration information under the categories of 'prevention and relief' and 'TA' and 'main duty/other' spend
- Introducing tranche payments and requiring accurate H-CLIC statistics (Homelessness Case Level Information Collection - data returns submitted by local authorities to DLUHC) to be submitted to receive the second tranche of funding

Section 1 – amendments to the funding formula

1. **Do you agree with our proposal to combine the HRG and HRA uplift elements of the formula, using HRA uplift formula for £110m of the grant?**
 - Yes
 - No
 - Indifferent
 - Not sure
2. **Do you agree with our proposal to apply an overall Area Cost Adjustment to the £110m element of the formula?**
 - Yes
 - No
 - Indifferent
 - Not sure
3. **Of the options presented to replace TAMF in the formula, which is your first preference?**
 - Option 1
 - Option 2
 - Not sure

- Indifferent
- Neither

Please explain why.

Both of these options penalise local authorities outside London with low numbers, and neither option captures numbers arising outside statutory homelessness duties/temporary accommodation e.g. children’s housing management decants.

4. Are there other indicators of TA pressures you recommend we consider?

Please explain why.

We would recommend that the extent to which other local authorities are placing people into other council areas (e.g. Wokingham Borough) is considered – as these placements from other LAs will result in additional pressures on the LA in that region, as it is this LA which will have to sustain the tenancy. This is something which Wokingham Borough is having considerable experience of.

Additional note on Question 1 above: Question left unanswered as the new proposed formula would result in more funding for WBC, which is greatly needed and so would be our preference of the two. However, the new formula still does not take into account the complexity of cases coming through (e.g. Domestic Abuse related), or the length of time that they take to resolve, and we therefore think that it needs further review.

Additional note on Question 2 above: “No” due to the fact that the proposal (to apply an overall Area Cost Adjustment to the £110m element of the formula) disadvantages local authorities which lie outside London and which would receive less funding as a result.

5. Of our proposed options in relation to missing data, which is your first preference?

- Option 1
- Option 2
- Not sure
- Indifferent
- Neither

Please explain why.

This does not affect Wokingham Borough.

6. Do the other data sources used in the FHSG element represent an accurate reflection of homelessness pressures?

- Yes
- No
- Partially

- Not sure

Please explain why.

The usage of H-CLIC data will not accurately reflect homelessness pressures in some regions, because it doesn't reflect early prevention work that is being done for households who are not yet owed the prevention duty, such as tenancy sustainment interventions, financial support to make accommodation affordable whilst seeking employment etc. Therefore, authorities are not being rewarded for this early prevention work and there is no incentive for other authorities to do the same, as they receive funding which these LAs doing early prevention work will not. Therefore, usage of H-CLIC data would only be an accurate reflection of homelessness pressures if it included early intervention cases and then monitored the outcome of these cases.

7. Do you have any alternative suggestions for data sources that could be used as indicators of homelessness pressures in the formula?

Alternative suggestions for data sources:

- Data which showcases the projected increase in demand (the demand in Wokingham Borough is predicted to almost double by 2026)
- Early intervention data – this can't currently be reported on as there is no capacity to do so as a statutory action, so money would be needed to address this effectively. Wokingham Borough has more places in temporary accommodation than a lot of authorities, and presentations placed there need to be reflected in the data as well as the private rental sector data, in order to give the full picture
- Data from prevention interventions across the borough (e.g. from schools)
- Data sources/sets should be extrapolated from Covid levels of demand (rather than pre-pandemic data), because the level of demand seen during the pandemic has been sustained thereafter. The increase in rough sleepers and domestic abuse during the pandemic now reflects a new normal which continues post-pandemic
- Usage of data sources should take into account peaks and troughs in demand and how local authorities can cope in light of this

Other comments:

Capacity needed for a coordinator across Berkshire, in order that there can be regional linked up working, which is currently not possible.

Section 2 – Transitional arrangements for 2023/2024 and 2024/2025

8. Do you want to see transitional arrangements introduced for 23/24 financial year?

- Yes
- No
- Indifferent
- Not sure

9. Do you want to see transitional arrangements introduced for 24/25 financial year?

- Yes
- No
- Indifferent
- Not sure

10. What percentage cap would you prefer to see?

- 5% in 23/24 and 10% in 24/25 as proposed
- 2% each year
- 5% each year
- 10% each year
- 20% each year
- None
- Indifferent
- Other
- Not sure

11. Please explain the reasons for your answers to the questions in this chapter, and provide any other thoughts or comments on this proposal.

Section 3 - Announcement of 2023-24 and 2024-25 allocations

12. Do you agree that funding allocations for 2023-24 and 2024-25 should be announced this year, providing the earliest funding certainty possible?

- Yes
- No
- Indifferent
- Not sure

Please explain why.

Knowledge of funding arrangements for future years much earlier on would help to plan service delivery, identify gaps in funding and would be useful for finance colleagues also in relation to things like requests for future growth bid etc.

Section 4 – additional spend declaration: assigning spend to categories

13. To what extent do you feel confident that local authorities would be able to provide a yearly spend declaration of HPG categorised under ‘prevention and relief’, ‘TA’ and ‘main duty/other’?

- Very confident
- Quite confident
- Neutral
- Slightly doubtful
- Very doubtful
- Not sure

14. Please use this space to provide reasons for your answer and any further thoughts or comments on this proposal. For example, this could include: whether you think the above definition of ‘prevention and relief’ spend is workable, whether there are other spend categories which could constitute ‘prevention and relief’ that we have not listed above, your views on the local authority’s ability to provide this information, your views on any additional impact this extra reporting requirement may have.

It would be very difficult for Wokingham BC to categorise a spend declaration in the way detailed in Q13, as it would be very resource intensive and would involve a significant process right from budgeting to placement invoicing. There is also no consideration of early intervention in the categories outlined in Q13, which is something which WBC believes should be recorded if such categorisation were to be put in place.

15. Would it be possible for local authorities to provide a more granular breakdown of spend than those proposed – for example, reporting the amount spent on staffing/incentive payments for a new tenancy/clearing rent arrears?

- Yes
- No
- Maybe
- Not sure

Please explain why.

We have access to this budget line data already and payments are categorised accordingly.

Section 5 – introducing tranche payments with comments

16. What is your view on our proposal to introduce tranche payments for the Homelessness Prevention Grant in order to incentivise better H-CLIC data reporting?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

17. If we were to introduce tranche payments, what percentage of the funding would you recommend be released in tranche 2 (later in the financial year)?

- 50%
- 25%
- 10%
- 5%
- None
- Other
- Indifferent
- Not sure

18. What is your view on the proposed conditions – publishable H-CLIC returns with full TA data - in order to receive tranche 2 of the grant?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Not sure

19. Please explain the reasons for your answers to the questions in this chapter, and provide any other thoughts or comments on this proposal.

We would agree with the conditions outlined in Q18, as this would ensure financial transparency, allow flexibility in making prevention payments and enable resource planning.

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Equality Impact Assessment (EqIA) form: the initial impact assessment

1. Process and guidance

The purpose of an EqIA is to make sure that the council is meeting the needs of all our residents by ensuring we consider how different groups of people may be affected by or experience a proposal in different ways.

The council has a two stage EqIA process:

- Stage 1 - the initial impact assessment
- Stage 2 - the full impact assessment.

This form is for use at Stage 1 of the process. This must be completed when undertaking a project, policy change, or service change. It can form part of a business case for change and must be completed and attached to a Project Initiation Document. The findings of the initial impact assessment will determine whether a full impact assessment is needed.

Guidance and tools for council officers can be accessed on the council's Tackling Inequality Together intranet pages.

Date started:	02/08/2022
Completed by:	Francesca Rowson
Service:	Housing and Place Commissioning
Project or policy EqIA relates to:	Homelessness Prevention Grant consultation response for 2023/24 onwards
Date EqIA discussed at service team meeting:	02/08/2022
Conclusion (is a full assessment needed?):	No
Signed off by (AD):	Rhian Hayes
Sign off date:	11/08/2022

2. Summary of the policy, project, or service

This section should be used to summarise the project, policy, or service change (the proposal).

What is the purpose of the proposal, what are the aims and expected outcomes, and how does it relate to service plans and the corporate plan?

To agree on Wokingham Borough Council's response to the Government's Homelessness Prevention Grant consultation for 2023/24 onwards, for submission by 26th August 2022. This consultation seeks feedback from local authorities and other relevant stakeholders regarding the Government's approach to the Homelessness Prevention Grant for the year 2023/24 onwards. The aim of the proposal is to ensure that the views of Wokingham Borough Council are conveyed to the Government regarding the future of this grant, in the light of ongoing work at the council to tackle homelessness, including early intervention where possible. By putting across these views, the proposal aims to suggest a way of allocating funding which accurately reflects the significant homelessness pressures in Wokingham Borough and recognises the numbers associated with early prevention success as well as private rented sector data. Tackling homelessness is a key priority of the Council's and this proposal aims to support the Council's work on this through submitting views to central government on this topic.

How will the proposal be delivered, what governance arrangements are in place and who are the key internal stakeholders?

The proposal consists of a consultation response, so delivery of this will consist of submitting the response through the online consultation form, once the submission has been agreed through the Individual Executive Member Decision.

Who will be affected by the proposal? Think about who it is aimed at and who will deliver it.

If the suggestions made by WBC are taken forwards by the Government, then there will be a positive impact on both those presenting as homeless and on the Council's services which relate to homelessness, as there will be a resultant increase in grant allocations for WBC for homelessness prevention.

3. Data & Protected Characteristics

This section should be used to set out what data you have gathered to support the initial impact assessment.

The table below sets out the equality groups that need to be considered in the impact assessment. These comprise the nine protected characteristics set out in the Equality Act 2010 and other priority areas defined by the council.

Age	Disability	Gender reassignment	Marriage and Civil Partnership	Pregnancy/Maternity
Religious belief	Race	Sex	Sexual Orientation	Socio-economic disadvantage

What data and information will be used to help assess the impact of the proposal on different groups of people? A list of useful resources is available for officers on the Council’s Tackling Inequality Together intranet pages.

The information used to understand the impact of the proposal on different groups is the data and experiences of WBC in relation to homelessness prevention in the borough. This is the same intelligence which informed the proposal itself, because the significant pressures relating to temporary accommodation and tackling homelessness in Wokingham Borough constitute the reason for the proposal and for the recommendations which it makes to central Government in terms of a future Homelessness Prevention Grant allocations formula. Additionally, more general, widely publicised information relating to homelessness, in terms of its most frequent causes and the groups which statistically it affects the most, has also been used to help assess the proposal’s impact. If the Government altered the details of the grant allocation to reflect the views and experiences of WBC, then the proposal would have a positive impact on these groups through a greater allocation of funding for the Council’s homelessness services; if not, then the effect of the proposal would be neutral.

4. Assessing & Scoring Impact

This section should be used to assess the likely impact on each equality group, consider how significant any impacts could be and explain how the data gathered supports the conclusions made.

Scoring impact for equality groups	
Positive impact	The proposal promotes equality of opportunity by meeting needs or addressing existing barriers to participation and/or promotes good community relations
Neutral or no impact	The proposal has no impact or no disproportionate impact.
Low negative	The proposal is likely to negatively impact a small number of people, be of short duration and can easily be resolved.
High negative	The proposal is likely to have a significant negative impact on many people or a severe impact on a smaller number of people.

Referring to the Scoring table above, please give an impact score for each group, explain what the likely impact will be, and briefly set out how the data supports this conclusion.

Equality group	Impact score	Impact and supporting data
Age	Positive impact	People in certain age groups e.g. younger people are statistically more likely to be affected by homelessness than on average, and the proposal seeks to increase homelessness funding for WBC services.
Disability	Positive impact	People with disabilities are statistically more likely to be affected by homelessness than on average, and the proposal seeks to increase homelessness funding for WBC services.
Gender reassignment	Positive impact	LGBT+ people are statistically more likely to be affected by homelessness than on average, and the proposal seeks to increase homelessness funding for WBC services.
Marriage and Civil Partnership	Neutral or no impact	
Pregnancy/Maternity	Positive impact	Being pregnant can increase someone's risk of becoming homeless, and the proposal seeks to increase homelessness funding for WBC services.
Religious belief	Neutral or no impact	
Race	Positive impact	Issues relating to language barriers are increasingly frequent in relation to homelessness presentations, since many presentations are by those from countries where the language(s) spoken is/are not English e.g. Ukraine. Any increase in grant funding through the proposal would result in more resource to aid those presenting as homeless whose first language is not English, and who may face language barriers in the process as a result. People from ethnically diverse backgrounds are also statistically more likely to be affected by homelessness than on average.
Sex	Neutral or no impact	Women are statistically more likely to be affected by Domestic Abuse than men, which constitutes the reason behind the homelessness presentation in some cases, however in general men are statistically more likely to be homeless than women.

Sexual Orientation	Positive impact	LGBT+ people are statistically more likely to be affected by homelessness than on average, and the proposal seeks to increase homelessness funding for WBC services.
Socio-economic disadvantage	Positive impact	People who are socio-economically disadvantaged are more likely to be affected by homelessness than on average, and the proposal seeks to increase homelessness funding for WBC services.

5. Conclusion and next steps.

Based on your findings from your initial impact assessment, you must complete a full impact assessment if you have identified any groups as having a low or high negative impact.

If no impact, or a positive impact has been identified, you do not need to complete a full assessment. However, you must include reference to the initial assessment in any associated reports, and it must receive formal approval from the Assistant Director responsible for the project, policy, or service change.