



City of Westminster

Cabinet

Meeting or Decision Maker:

Cabinet

Date:

15 July 2024

Classification:

Part Exempt

The accompanying report is part exempt from disclosure by virtue of the following Paragraphs of schedule 12A to the Local Government Act 1972:

The Part B of this report be confidential pursuant to paragraphs 3 and 5 of Schedule 12A to the Local Government Act 1972 because it contains information relating to the financial or business affairs of tenderers for the contract which is the subject of this report, and Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings. In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Title:

Reshaping of Housing Solutions Service

Wards Affected

All

Policy Context:

Direct contribution to *Creating a Fairer Westminster: Year 2 Delivery Plan* – improving our approach to supporting those in housing need.

Key Decision:

Yes

Decision is likely to impact on communities living or working in two or more wards.

Financial Summary:

The direct financial implications of the recommendations in this report indicates an estimated 12% uplift in cost when compared to the current cost of delivering the service over the initial 2-year transition period. It is anticipated that the recommendations will bring about greater control over service provision and contribute to savings of Temporary Accommodation costs in the medium term as a result.

Report of:

Sarah Warman, Strategic Director - Housing and Commercial Partnerships

1. Executive Summary

- 1.1. Responding to the increasing demand of those in housing need is a challenge faced by local authorities across the country. London Councils has reported that one in 50 Londoners is currently homeless. In Westminster the pressure to support those in need is set against a difficult and demanding environment with a challenging and limited housing market and continued cost-of-living pressures for many residents.
- 1.2. Providing Housing Services that are responsive and empathetic is central to delivering on our Fairer Westminster commitments. This offer of improved services is underpinned by revisions to our Allocations Policy, development of a new Homelessness and Rough Sleeping Strategy and a temporary accommodation acquisitions programme.
- 1.3. The council made a commitment to review the Housing Solutions Service (HSS) which acts as a gateway for those seeking support and advice. In doing so identifying opportunities to strengthen front line delivery and address increasing operational pressures faced by HSS. Through this work, we have also delivered on one of the recommendations of the Future of Westminster Commission to identify any parts of the service that could be delivered in-house directly by the Council.
- 1.4. The Council's HSS has been provided externally for over 20 years with the service currently commissioned to Places for People and delivered by their subsidiary company Residential Management Group (RMG). The current contract was awarded in 2017, prior to the introduction of the Homelessness Reduction Act 2017, which introduced the duty to prevent homelessness and the duty to relieve homelessness. These legislative changes have had a significant impact on demand for the service, which has had to adapt from the original service model.
- 1.5. In 2017/18, HSS received 729 homelessness applications with 443 main duty acceptances. This compares to 3019 applications and 993 acceptances in 2023/24. This represents a 302% increase in applications and a 126% increase in main duty acceptances from the start of the contract. The rising demand and complexity of cases has placed unprecedented operational pressures on the service. This has required additional resource to be made available to ensure the service can continue to meet demand and have sufficient oversight of placements into temporary accommodation. With the contract in its final year and demand increasing year on year, it is appropriate to consider a new service delivery model and level of investment in the service.
- 1.6. A full options appraisal has been undertaken in line with the Insourcing Framework developed and introduced across the Council in January 2023. Through this work several alternative delivery models have been considered with feedback from service users and other stakeholders helping to inform the recommended model. This report sets out the

findings from the options appraisal and recommends that a hybrid model of delivery is pursued.

- 1.7. In practice this would mean insourcing of Frontline Housing Advice, Homeless Prevention and Support Services, Families Pathway and Assessment, Nominations and Allocations for direct internal delivery, while the singles pathway and management of Council owned TA provision remains commissioned from the market. A hybrid model of delivery will provide a phased and measured approach to managing this transition and ensures service continuity of critical, front-line services.
- 1.8. As the service has been outsourced for over 20 years, there is an opportunity to re-design services with residents and service users in light of the current context. By insourcing these key elements of the service, the council will gain greater control and influence of the service and ensure it is better connected into wider services across the Council. This will include being better placed to understand and respond earlier to demand, including the temporary accommodation that is used and the financial risk that increasing demand for temporary accommodation brings.
- 1.9. The financial model for the proposed service, indicates that implementing a hybrid model represents an estimated 12% uplift in cost when compared to the current cost of delivering the service, subject to final TUPE costs and the cost of retendering commissioned contracts. Given that the contract was last procured in 2017 and demand since then has steadily increased, additional investment has been made to the contract in 24/25 to meet operational pressures. A future budget ask will be for this level of investment to continue into 25/26 as demand is likely to remain high. Future investment in 25/26 in the early intervention and prevention service will ensure a strengthened prevention model is in place to help reduce the rising demand and cost of TA.
- 1.10. Insourcing these services is a large and complex change programme which requires robust management. A governance framework will be established setting out roles, responsibilities, service, and on-going performance reporting. Progress will be reported monthly to the Insourcing Programme board, to the Cabinet Member for Housing, as well as routine updates to ELT Improvement Board. A comprehensive communications plan will also be required to ensure that staff and service users are aware of any changes and how to get in touch should they need further information on what these changes mean for them.

2. Recommendations

That Cabinet:

- 2.1. Approve the implementation of a hybrid delivery model for Housing Solutions Services.

- 2.2. Agree to bring in-house Lot 1: Frontline housing advice and homelessness prevention and Lot 3: Families Pathway, Housing Assessment, Allocations and Nominations Services, to be directly delivered by the Council by April 2025.
- 2.3. Agree to insource back-office functions currently commissioned to support Housing Solutions including, a contact centre, complaint management, and finance functions, to sit within existing services across the Council.
- 2.4. Delegate approval for the new operating model and associated budget for insourced services jointly to the Strategic Director of Housing in consultation with the Cabinet Member for Housing Services and the Executive Director of Finance and Resources in consultation with the Cabinet Member for Finance and Council Reform.

3. Reasons for Decision

- 3.1. In light of the new legislative context and unprecedented demand the service is facing, there is a need and opportunity to review the current service model.
- 3.2. The Future of Westminster Commission Housing Review was established to review policy and advise on the implementation of key housing objectives. [The final report of the Housing Review](#) recommended that the council review whether any parts of the Housing Solution service could be delivered in house, with a clear focus on early intervention, casework and getting decisions right first time.
- 3.3. The Council's HSS contract was last awarded in 2017 as four separate contracts:
 - **Lot 1** - Frontline Housing Advice, Homeless Prevention and Support Services (RMG deliver in partnership with Shelter)
 - **Lot 2** - Single Person Homeless Service (RMG deliver in partnership with The Passage)
 - **Lot 3** - Families Pathway and Assessment, Allocations and Nominations.
 - **Lot 4** - Management of Council owned Temporary Accommodation.
- 3.4. An options appraisal including feedback from service users, experts by experience and Council stakeholders, assessed the advantages and disadvantages of three different delivery options:
 - i) Full recommissioning
 - ii) Full insourcing
 - iii) Partial insourcing to create a hybrid model
- 3.5. The recommendation in this report is to implement a hybrid model where two of the four Housing Solution services are insourced to give greater control and influence that will strengthen the prevention of homelessness through improvements in earlier intervention and the support people receive. The remaining two services will remain commissioned from the market to

utilise the experience and capacity of providers. To ensure deliverability of the insourcing programme, it is our intention subject to negotiation to extend the two commissioned contracts before being retendered from the open market

- 3.6. By insourcing and remodelling early intervention and prevention, (currently Lot 1 services) earlier community-based support and intervention will aim to prevent, reduce and delay the need for temporary accommodation and therefore will help manage the rising costs of temporary accommodation. By insourcing the families pathway, assessment, and homelessness decision making, allocations and nominations functions the Council will have the ability to provide more person-centred support for those who need it, integrate with wider Council services and have direct control and operational oversight of statutory decision making.
- 3.7. Given the current operating context of unprecedented demand, lack of affordable supply, and a front-line statutory service which the Council has not had direct operational control over for 20 years, the hybrid model is recommended as it provides a phased and measured approach to managing this transition and ensures service continuity of critical, front-line services remains with trusted providers. A summary of the options appraisal can be found in Appendix A.

4. Background, including Policy Context

Existing Housing Solutions Service

- 4.1. Westminster faces a number of significant pressures and challenges that are driving the need for the Council to implement a new delivery model for Housing Solutions. The service was last retendered in 2017, prior to the introduction of the Homelessness Reduction Act 2017, which introduced the duty to prevent homelessness and the duty to relieve homelessness. These legislative changes have had a significant impact on demand for the service, which has had to adapt from the originally intended model. In 2017/18, HSS received 729 homelessness applications with 443 main duty acceptances. When compared to 2023/24, this represents a 302% increase in applications and a 126% increase in main duty acceptances from the start of the contract.
- 4.2. The demand for TA placements has come as a result of both legislation and global events driving market pressures resulting in a challenging and limited housing market and continued cost-of-living pressures for many residents. Demand for TA in Westminster has increased rapidly from 2526 households TA in 2017/18 to 3494 households in March 2024 and with projections reaching 4100 in 2025/26.
- 4.3. The rising demand and complexity of cases has placed unprecedented operational pressures on the service and has required additional resource to be made available to ensure the service can continue to meet demand and have sufficient oversight of placements into temporary accommodation.

With the contract in its final year, and with demand increasing year on year, it is appropriate to consider a new service delivery model and level of investment in the service.

- 4.4. The Council's HSS current contract delivered by RMG in partnership with Shelter and The Passage involves approximately 155 staff across the 4 contracts. Services are provided in a variety of locations across the Borough including Bruckner and Charlwood Street - offices owned by the Council. However, the Assessment and Prevention for single people is located at The Passage, the only building utilised that is not owned by the Council. The Council provides RMG with access to utilise its Council's Housing Management IT system (Hope and Orchard), finance systems and iCasework.
- 4.5. The Insourcing Programme Board was established to oversee the assessment of insourcing previously outsourced contracts across the authority by providing a view on desirability, feasibility and viability of insourcing. The framework has been designed to be structured, consistent, grounded in sound analysis including resident feedback and the consideration of risk. The Council's HSS is one of over 20 commissioned services that has been considered by the Insourcing Programme Board and a detailed options appraisal recommended.
- 4.6. The options appraisal was informed by feedback from service users and experts by experience, collected through the Homeless and Rough Sleeping Strategy engagement, complaints, service feedback, and 50 interviews with Council stakeholders. This feedback helped to understand the current service's strengths, the opportunities and impact of change. The review concluded that:
 - **Processes and delays impact the user experience:** While decisions are being made within the legal framework, service users do not always receive regular communication, updates on their cases or receive timely decisions. During times of high demand, backlogs can occur which creates a variable perception of the service.
 - **Lack of Person-Centred Communication:** Feedback from stakeholders, complaints and qualitative call centre analysis indicate that communication is not always as person centred or as empathetic as we would like.
 - **Prevention activities are not currently tailored or always meaningful:** There is a one-size-fits-all approach for all local areas and communities. The current model of prevention is reliant on residents coming to us, knowing where to go, and coming to us early.
 - **There are different referral mechanisms and services:** A different service is offered depending on whether you are a single person in the statutory pathway, an adult in need of supported accommodation, or a rough sleeper. This is not a streamlined process and could be consolidated into a single pathway or integrated front door; or at least be managed closer together to ensure the right level of support is offered to best meet needs.

- **Opportunity for more collaborative working:** There are opportunities to integrate with other council functions and to allow for better partnership working with communities e.g. Family hubs, GP Practices, Faith Groups etc and enable the prevention of individuals and households coming into the service in the first place.
 - **The service user experience for a family can be improved:** A lack of multidisciplinary working means decisions are not being made from a holistic viewpoint and families can be given differing advice from different teams. Feedback from Children's Services consistently centres around not being able to easily navigate the housing service and not knowing who to contact to receive an update on a family's housing application.
- 4.7. The options appraisal assessed the advantages and disadvantages of three different delivery options including:
- **Option 1: The service remains fully commissioned (outsourced)** - This would involve retendering a service or services from the open market and entering into a new contractual relationship with the winning bidder for the delivery of Housing Solution services. This option was included in the appraisal to explore whether the service could continue to be commissioned and be further enhanced through a new service specification.
 - **Option 2: The entire service is brought in-house** - The Council would bring in-house direct delivery of the whole service, seeking to have direct operational control and accountability for statutory decision making.
 - **Option 3: A combined commissioned and in-house delivery model (hybrid)** – This would involve the Council taking direct control and in-sourcing some but not all of the existing 4 contracts and recommissioning the remaining services from the market. This option was considered to ensure deliverability and manage the risk, given the statutory nature of the service and potential disruption to vulnerable service users.

Hybrid Delivery Option

- 4.8. After analysing the detailed feedback, a hybrid delivery model (Option 3) is considered the best way to meet both the aspirations of the Council and the needs of those accessing the service and makes best use of the capabilities of the Council and its commissioned providers.
- 4.9. The majority of Local Authorities discharge the equivalent of their Housing Solutions Service in-house and research suggests that Westminster is an outlier by comparison. Moving to a hybrid model provides a greater level of control and influence, while recognising the contribution of providers. The risk of bringing all of the services in-house at the same time is deemed too high, especially given the statutory nature of the service and potential disruption to vulnerable service users. A hybrid approach would mean the single pathway and management and supply of Council owned TA stock (current Lots 2 and 4) which are both well delivered services would remain

commissioned from the market, but the Council could choose to insource these services at a later date subject to contracts ending.

4.10. The proposed hybrid delivery option will allow a focus on redesigning the prevention and early intervention service, transforming the service user experience in key areas such as the families' pathway at pace; and benefiting from standard back-office functions by insourcing these into the relevant Council teams.

4.11. More specifically, advantages of the hybrid delivery model include:

- By utilising our Council and community assets, early intervention and prevention services could be located throughout the borough in community hubs, family centres and housing service centres, to provide multiple access points for more accessible, early intervention. By growing community capacity and strengthening the information and guidance given out by partner organisations already interacting directly with residents worried about their housing situation, we can have a community wide approach to practical help which reaches beyond the statutory process of prevention. This is currently Lot 1.
- By recommissioning the singles pathway (currently Lot 2) from the market in line with supported accommodation and rough sleeping services there is an opportunity to develop a clear and consistent pathway and professional offer for singles. Regardless of the channel an individual accesses the service through, a multi-faceted 'front door' offer can be personalised to best suit the person at appropriate times. Recommissioning this revised pathway from the market will improve system working and release efficiencies and duplication as well as using the skills, expertise and capacity from the market.
- Families (currently Lot 3) can have an improved user experience as the service they receive will be more person centred as a result of the Council having more direct control over the service. Closer working and potential co-location of housing solution staff with Children's services will improve communication and ensure a holistic response to families in crisis.

In practice this means...



- The Council will have closer control over allocations and the management of the housing register (currently Lot 3) and will be better placed to ensure it can meet this statutory duty. The Council is already sourcing new TA stock in-house and has the capability to do so. Therefore, there is an opportunity to bring allocations and the management of the housing register closer together in-house.
- By directly delivering the assessment and placement process, the

Council will have direct control over the placement of eligible singles and families into TA. The rising demand and cost of supply of TA is a significant financial risk to the Council, and therefore directly delivering this service will ensure the wider context of TA is integral to how the service is delivered.

- There is an existing market for the management of Council owned temporary accommodation, which can provide both property services and support services for vulnerable clients living in TA. This is currently Lot 4. As the Council owned TA stock increases, the opportunity to manage and support this stock will drive value from the market either as a stand-alone contract or as part of a tendering opportunity across Housing Management.

4.12. We acknowledge that the transition to a hybrid delivery model has to provide a better service for users. For this implementation to be a success, it is essential that experts by experience and communities are included in the design of the future Housing Solutions offer. In line with the developing Homelessness and Rough Sleeping Strategy, external facilitation will be used to ensure service users and experts by experience are engaged with and have opportunities to shape the future delivery model, with the aim of creating a more person-centred service which maximises the best use of skills and capacity across the Council, our Voluntary Community Sector partners and wider market to deliver a high-quality integrated service.

4.13. As part of the options appraisal, we have assessed the risks which are set out below:

- We are introducing this significant change at a time when Westminster faces some of the most severe homelessness challenges of any Local Authority in the UK, as a well-connected central London location with extremely limited affordable housing for low-income households. The scale of the challenge means that we will need to work collaboratively with local, regional, and national partners to address the structural drivers of homelessness as well as responding to the immediate needs of people at risk of or experiencing homelessness in Westminster.
- For the first time in 20 years, the council will take on operational responsibility to manage the service, reshape the service and drive improvement at a time of increasing demands and in the context of the operational pressures described.
- The transition to a new model poses risk to service continuity and performance levels which will need to be well managed.
- There will be a requirement to ensure a coordinated, integrated, and consistent service to clients of both the insourced and outsourced services to prevent services being disconnected and disparate. By implementing a hybrid model, it will be essential to ensure the end-to-end process for individuals and families interacting with any aspect of the service, from any service centre, still feels connected and seamless. Creating a partnership approach with commissioned providers who are closely involved with shaping services and making

whole system improvements will be vital to the hybrid model being successful.

- Managing the exit provisions of the contracts, including ongoing negotiations on residual contracts ahead of retendering.
- Conducting a TUPE process for eligible staff where some but not all of the current staffing structure will be insourced and ensuring continuity of service delivery leading up to and post TUPE transfer.
- Operational capacity and interdependencies with the Homelessness and Rough Sleeping Strategy and Allocations Policy
- Uplift in operating costs associated with the hybrid model, set against the context of the Council's Medium Term Financial Plan.

4.14. Project governance will be in place to ensure all risks are well managed and monitored throughout the implementation phase.

Implementation

4.15. The Council acknowledges that this will require a significant amount of effort and change to allow the service to operate differently. A dedicated project team will be established through one off implementation funding to oversee the detailed service design work, the insourcing plan and prepare the due diligence on all statutory services coming into direct Council control. The Council is proposing a phased approach to implementation to best mitigate the risks associated with the project.

- **June 2024 – March 2025**

- Prevention and Early Intervention services are redesigned with a new operating model and structure (Jul – Oct)
- Families' pathway is improved and opportunities for joint working identified. (Jul – Oct)
- Due diligence completed on all statutory processes and decision making. (Sep – Dec)
- Mapping of back-office functions to inform TUPE transfer (Sept – Dec)
- Identify resource to be TUPE'd (Nov – Dec)
- Post TUPE resource identified, roles created and recruited to (Nov – Mar 25)
- TUPE transfer (Jan – Mar 25)
- Staff engagement and communication (Jul 24– Mar 25)
- Engagement, co-production and Equalities Impact Assessment carried out. (Jul – March 25)

- **April 2025**

- Early Intervention and Prevention, Families Pathway and Assessment Allocations and Nominations (current Lots 1 and 3) are insourced into the Council.
- Back-office functions are transferred into relevant Council teams
- Wider transformation including digital improvements considered

- **June 2025 – September 2025**
 - Further review and decision on recommissioning of singles pathway and management of Council owned TA . This review will include assessment of the feasibility and desirability for further insourcing.
- **October 2025 – March 2026**
 - Recommissioning or insourcing of singles pathway and management of Council owned TA.

5. Financial Implications

Current Service Overview

- 5.1. The baseline budget for the Homelessness Service in 2024/25 is summarised below:

Table 3 – Baseline Budget

	Recurring	One-Off	TOTAL
2024/25 Gross Budget	£11,337,600	£850,000	£12,187,600
Homelessness Prevention Grant (HPG)	(£2,099,200)		(£2,099,200)
Other Contributions (incl. HRA)	(£1,421,200)		(£1,421,200)
2024/25 Net Budget	£7,817,200	£850,000	£8,667,200

- 5.2. The table above includes the one-off funding injection of £850k to increase staff capacity to the end of the current contract term (agreed in the March 2024 budget report). This was identified as necessary to manage increasing levels of homelessness presentations. An extension of the £850k one-off funding will be reviewed as part of the MTFP budget setting process as demand is unlikely to reduce in the medium term.

Proposed Service Overview

- 5.3. For the purposes of assessing the financial implications of the proposal in this paper, a two-year outlook covering the initial transition period has been assessed. This covers the following:
- The initial in-sourcing required to switch to a hybrid service delivery model (with those services transferring to the Council in their current structure).
 - An assumption that negotiation will be undertaken with the current service provider for them to continue to deliver the services that are to remain commissioned for an initial 12-month period.
 - An expectation that a full tender exercise will be undertaken in Year 2 of the transition for the services that will remain commissioned.

- 5.4. The financial appraisal assesses the proposal and identifies the pure cost uplift driven by the proposal to move to a hybrid (partly out-sourced and partly in-sourced) delivery model. In year 2 the cost totals £10.1m. This represents an estimated 12% uplift in cost when compared to the current cost of delivering the service, and a 21% increase, when compared to the 2024/25 budgeted contract cost. This also includes an assumption of around 5% efficiencies. There is an intention that growth in prevention to reduce demand on temporary accommodation will be requested through the budget setting process. The additional budget increase, which totals £1.322m in 2025/26 and £1.787m in 2026/27, is mainly related to staff pay and Local Government pension costs.

One-Off Project Resource Requirements

- 5.5. In addition to the baseline budget growth outlined in detail above, it is recognised that a project team will be required to deliver the in-sourcing proposal and support wider service changes. The fixed term team for a period of 18-months will be responsible for establishing the service delivery model with experts by experience and the wider community, leading the recommissioning of the singles pathway and rough sleeping services, supporting with the TUPE transfer of staff, and ensuring that staff feel informed and supported throughout the transition period.
- 5.6. It is estimated the team will cost up to £1.2m which will be funded from the Temporary Accommodation Reserve, and not as a recurring cost to the Housing General Fund budget.

6. Legal and Governance Implications

Governance

- 6.1. Decisions on the strategic direction of Housing Services are an executive function and it is thus legitimate for the executive to be considering such a matter. Authority for setting the strategic and policy direction for these services is delegated to the Cabinet Member for Housing Services. It is however standard and good practice for decisions with wide ranging and cross-portfolio impact to be taken by the Cabinet as a collective body. This is in accordance with Chapter 3 Section 2 Paragraph 2(1)(e) of the Council's Constitution.

Housing

- 6.2. Under part VII and part VI of the Housing Act 1996 [as amended], the Council has various obligations to homeless applicants and is required to discharge statutory duties in relation to homeless functions such as intervention and prevention duties to single applicants and households at risk of homelessness. A full housing duty to provide suitable temporary accommodation to accepted homeless households, and discharge of this housing duty by allocation of permanent homes are additional key statutory duties that the Council is required to fulfil. While ensuring appropriate and suitable homes are

available to homeless households, the Council should be aware of its duty to households with children and vulnerable adults.

- 6.3. There is a risk of increase in legal challenges and judicial review claims against the Council in case of noncompliance of Council's housing duties.

Employment

- 6.4. From an employment perspective, the legal implications to this decision are primarily in relation to the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE). TUPE protects the rights of employees when they transfer to a new employer. Briefly, where TUPE applies, affected employees automatically transfer to their new employer on their existing terms and conditions. There is a statutory novation of employment contracts and the transferee steps into the transferor's shoes and assumes rights and liabilities in respect of all the employees working in the organised grouping at the moment of transfer. There are also limited circumstances in which changes can be made to transferring employees' terms and conditions, where the sole or principal reason for the variation is the transfer itself.
- 6.5. TUPE is likely to apply to the proposed hybrid model as there would be a service provision change in relation to the services which will be delivered by the Council. There may also be a TUPE transfer for any new contracts awarded, if the relevant conditions are met, but this would be a matter for the outgoing and incoming providers, rather than the Council. However, it should be noted that the application of TUPE is highly fact-sensitive and likely to be complicated by the current subcontracting arrangements and the proposal to bring some services back in-house, whilst re-tendering others, so thorough due diligence will be required.
- 6.6. In relation to any transfer of employees to the Council, the Council will have a duty to inform and, if appropriate, consult appropriate representatives of affected employees, which includes both employees who are to transfer and existing employees whose jobs may be affected by the transfer.

7. Climate Implications

- 7.1. As set out in paragraph 4.4 of this report, the services are currently delivered out of three main premises, two of which are owned by the Council. To ensure optimum service delivery, and earlier intervention and prevention, service design and engagement will consider the suitability of these delivery hubs and whether alternative delivery locations such as family hubs, community hubs, libraries, Voluntary Community Sector locations should be considered. Therefore, the carbon impact of these decisions will be considered during the service design and engagement phase of the project.

- 7.2. Wider climate impacts such as air quality and biodiversity are not considered to be a consideration with a change to direct Council delivery of these services.

8. Equalities Implications

- 8.1. An initial Equalities Impact Assessment screening has been undertaken for our Housing Allocations scheme, which is the same demand cohort who receive Housing Solutions services. It found that when looking at demand for housing assistance, certain groups with protected characteristics were overrepresented compared to their population share:
- Females
 - (Asian all) Asian any other background, Asian Bangladeshi, Asian Indian, Asian Pakistani, Arab, Chinese
 - (Black all) Black African, Black any other background, Black Caribbean, Mixed White and Black African, Mixed White and Black Caribbean
 - Age 35-49 years
 - Disabled (Housing register only considers mobility)
- 8.2. As part of projects engagement plan, a full EIA will be conducted alongside the service design and co-production work commencing in June 2024. As part of this engagement plan we will ensure the following:
- We are clear with stakeholders and service users about the parameters of this work; that this is about a change of delivery model and in itself will not result in an increase in housing supply.
 - Seek out those whose housing needs have already been resolved, and their valuable reflections on the process.
 - Consider opportunities for co-design with service users and how they can support and have influence over the design of the insourced services.
 - Seek out representation from groups with protected characteristics who may be overrepresented in their population share, to ensure we are doing all we can to minimise inequality in the design of the new services.
 - Ensure ongoing review and consideration of the impact of insourcing and new service design on service users and staff who have protected characteristics.

9. Consultation

- 9.1 Legal advice has been obtained on consultation, which confirmed that there was no statutory requirement to consult on the proposed changes. There is no general obligation at common law to consult. The obligation will arise either as a result of express statutory requirement or ii. as a result of a legitimate expectation.
- 9.2 The options appraisal which has informed the recommendations in this report, drew from feedback from service users and experts by experience gathered

through the Homeless and Rough Sleeping Strategy engagement, complaints, and service feedback, and 50 interviews of Council stakeholders to understand the strengths of the current service, the opportunities and impact of change and to help assess the delivery options. Going forward, the service will engage service users and wider stakeholders particularly those with lived experience of the service to provide input, direction on the service design and feedback on the changes proposed. The feedback of service users, and stakeholders will assist us to shape the design and implementation of the service change and address any issues or concerns that may arise.

- 9.3. This engagement will aim to build trust and rapport between service providers and service users, which can enhance the quality and effectiveness of the service and to increase the awareness and understanding of the service change among service users, and our wider stakeholders.
- 9.4. A public consultation on the Allocations Scheme, via the Common Place platform was open to the public for 4 weeks in February 2024. Over 5000 households currently on the Housing Register were notified of the public consultation and the 6 facilitation events which were held across Westminster for residents who may be digitally excluded and need support completing the Public Consultation. In total, 804 responses were received, with the feedback informing changes to the current Allocations Scheme.
- 9.5. A public consultation is also due to be launched at the end of July 2024 on Westminster’s Homelessness and Rough Sleeping Strategy. This will aim to receive public appraisal of the priorities and policies of the draft strategy and to understand any gaps in thinking to date.
- 9.6. Feedback from both public consultations will inform the service design of the new hybrid model of delivery where applicable.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact:

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APPROVED BY

Name and Title	Date Sent	Date approved
Sarah Warman, Strategic Director of Housing and Commercial Partnerships	9 April 2024	16 April 2024
Nick Haverly, Finance	9 April 2024	16 April 2024

Gerald Almeroth, Executive Director of Finance and Resources		
Deborah Down, Sarah Parker and Shweta Mandokhot, Legal	9 April 2024	16 April 2024
Richard Cressey, Governance	10April 2024	

APPENDICES

Appendix A – Summary of Options Appraisal Outcome.