‘At the Coalface’: The Role of the Street Level Bureaucrat in Provision of Statutory Services to Older People Affected by Homelessness

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ABSTRACT

Research has revealed that households affected by homelessness in England have increased due to the combined effects of an economic downturn and political austerity. Yet due primarily to the latter statutory provision to meet these extra demands have, if anything, decreased. This thesis employs Lipsky’s street level bureaucrat conceptual framework to assess the effectiveness of Local Authority Housing Option Service (LAHOS) provision in respect of older people at threat of homelessness in England. More specifically it considers how frontline delivery at the individual level coalesces with organisational and central level determinants. Lipsky maintained that resource scarcity and higher level pressures underpinned an inability to undertake public sector roles effectively. Investigations which have shown that LAHOSs at times resort to illegitimate gatekeeping to meet politically motivated objectives or in order to protect limited local supplies lend additional support to this argument. Although households of all ages are potentially vulnerable to homelessness, it has been found that older people lose their home due to a unique combination of singular or aggregate causations. Further, in many respects the housing need of older people has been shown to be qualitatively distinct from other groups. Despite this, evidence suggests that policy is persistently failing to address these issues due to a tendency to homogenise older people, or focus on the ‘oldest old’ who require care or support services. Yet homelessness amongst ‘younger’ older people is likely to increase in parallel to the expected exponential rise in the percentage of people over 50 in the population. A multi faceted research design was adopted to explore the wider conditions of provision alongside the delivery mechanisms at the meso and micro levels. This incorporated a national baseline survey, 27 individual interviews in 12 LAHOSs and a group interview with third sector professionals. It was found that service outcomes were negatively affected by pressures due to resource shortages and role objectives set at a higher level. It was further identified that individual or peer level factors, such as categorising particular service users within narrow or stereotypical frames, could also impact upon decision making processes. Overall, the application of Lipsky’s framework to homelessness services proved an effective tool to assess the complex interplay between higher level and frontline role pressures, highlighting where policy makers should consider directing change. However, the model is best viewed as a conceptual guide to frontline statutory implementation, rather than as a prescriptive ‘one size fits all’ approach.
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ABBREVIATIONS

DCLG: Department of Communities and Local Government
LAHOS: Local authority housing options service(s)
LHA: Local housing allowance
LSC: Legal service commission
NPM: New Public Management
ODPM: Office of Deputy Prime Minister
SLB: Street Level Bureaucrat
TSO: Third sector organisation
CHAPTER ONE

Introduction

This thesis employs Michael Lipsky’s (1980, 1971) street level bureaucrat (SLB hereafter) conceptual framework to assist in assessing the effectiveness of current service provision for older people affected by homelessness in England. To a lesser extent it draws upon the work of Prottas (1979), a former student and collaborator of Lipsky. Although homelessness acceptances in England experienced a slight decline in 2013, they have still risen by nearly a quarter overall following the economic downturn (DCLG 2014b). Similar increases have been reported in respect of households requiring help due to the threat of homelessness (Fitzpatrick et al 2012). Furthermore, this upward trend looks set to continue as a growing number of households experience the effects of welfare cuts (Crisis 2012a). However, despite this growth and an economic policy agenda which has been described as ‘radical fiscal retrenchment’ (Nevin and Leather 2012, p14), reducing homelessness acceptances and use of temporary accommodation remains a primary political objective (DCLG 2012b; Parliament 2012a). In summary, Local Authority Housing Option Services (LAHOSs hereafter) are experiencing an environment in which service users are increasing yet resources to tackle this have, if anything, reduced. Running alongside a politically austere climate the main Coalition led legislative change to have an impact upon LAHOS delivery is the Localism Act (Parliament 2011). The stated aim of the Localism Act is to encourage greater discretion at the community level; of direct relevance to LAHOS implementation is the provision relating to whether discharge of the main homelessness duty can be satisfied via suitable private, as opposed to social rented accommodation (this is discussed further in Chapter Two).

Lipsky (1980) argued that theoretically the role of frontline public sector workers was to assist all (ordinarily vulnerable) households who approached for help, yet in reality were unable to satisfy this objective due to the weight of bureaucratic constraint. He maintained that resource scarcity underpinned this inability to undertake the role effectively and led employees to apply discretion in a flawed or discriminatory fashion. Of particular interest to the aims of this thesis is Lipsky’s (1980, p193) argument that an uneven distribution of available resources led to some service users being provided with inadequate provision.
Although Lipsky only made brief reference to homelessness services in a Northern American context, he believed that his framework was applicable to any public service organisation that had extensive face to face contact with the public and exercised discretion (Lipsky 2010, pxvii). LAHOSs were assessed as representing a good fit due to a combination of its statutory function, tight budget, discretionary element in service delivery and its position as a ‘stigmatised’ service, which Lipsky (1980, pp. 91-92) believed would be especially prone to SLB type practices (the SLB framework is returned to below and in Chapter Two).

While households of all ages are potentially vulnerable to homelessness, it has been found that older people lose their home due to a unique combination of singular or aggregate causations. Further, in many respects the housing need of older people has been shown to be qualitatively distinct from other groups (the evidence to support this assertion is discussed in Chapter Three). Yet despite this it has been maintained that the social and economic trajectories of older people tend to be homogenised (Walker 2012; AgeUK 2011b; Pannell and Palmer 2004, p20) and in respect of homelessness policy formulation is for the most part overlooked. Furthermore, if housing problems are acknowledged it generally concentrates on the ‘oldest old’, linking need to care and support concerns (Pannell and Palmer 2004). It has moreover been argued that homelessness tends to take on a pathological identity when placed in the media spotlight (Herring 2009). These negative representations in turn feed into generic typecasts of older people, customarily highlighting the limiting aspects of growing old (Herring 2009, pp19-20). In the few cases where homelessness among older people is acknowledged it tends to evoke images akin to the more extreme forms of rooflessness, such as that of a ‘bag lady’, despite findings which show that this portrayal rarely echoes reality (Kisor and Kendal 2002). This latter point reflects a wider issue that when older people affected by homelessness are considered, be that politically or theoretically, the focus tends to be on visual, acute types rather than those at threat of, or who experience its invisible manifestations (see below).

With regard to how older people affected by homelessness are considered by policy makers it has been argued that younger people are prioritised for homelessness funding programmes whereby older cohorts have few services available to meet their particular needs (Bowpitt et al 2011; Jones and Pleace 2010; Carlton et al 2003, p36; Warnes et al 2003; Crane 1999; Kitchen and Welsh 1998). Other policy areas which may impact on the homeless population,
such as those relating to substance misuse, have been similarly charged with focusing on families and younger people to the detriment of older groups (DrugScope 2014, p6). Moreover, unlike families with children or persons under 18, the legal assessment of vulnerability on the basis of older age is unclear (Parliament 1996), which has led to differing interpretations between and within individual LAHOSs (Hawes 1999; London Research Centre 1990, cited by Age Concern 1991; Niner 1989). Addressing the findings which point to neglect and ambiguity in provision for older LAHOS users forms one of the overarching aims of this thesis and is considered in some detail in Chapters Three, Five, Eight and Nine.

The remainder of this chapter begins by outlining the main research questions and highlights this thesis’s unique contribution to knowledge in respect of statutory service provision for older people in LAHOSs. It follows this with a summary of the research strategy before describing the core themes in greater detail, namely the LAHOS policy and delivery environment, homelessness typologies, a contextualisation of the SLB framework within an implementation perspective and a conceptualisation of older service users.

**Research questions and summary of main contribution**

This thesis is primarily informed by a social policy approach; however, due to its interdisciplinary nature the literature and research design incorporate themes and/or specific concepts from other subject areas, such as politics, sociology, social work, law and social gerontology. In light of the context outlined above it aims to answer the following broad research questions:

1. Can Lipsky’s SLB conceptual framework offer an effective tool to help understand the exercise of discretion in LAHOSs, principally its negative employment?

2. Can the SLB framework assist in comprehending variation in service delivery, such as the allocation of resources, interpretation of legislation and service user differentiation, with a focus on older people affected by homelessness?

3. With particular reference to older people, in what ways may the current political context, principally relating to welfare reform and austerity measures, impact on LAHOS delivery? What has this meant for established role objectives, such as the requirement to limit statutory homelessness and temporary accommodation use?
4. How do LAHOSs perceive their role in delivering political objectives relating to homelessness? What internal or external constraints do they identify and in what ways can these be overcome or improved?

In Summary this thesis applies an implementation focused lens to explore LAHOS delivery in respect of a group which have been relatively ignored in political and scholarly debates. It further combines this with a distinct research design which aimed to capture the macro, meso and micro level concerns that exist in contemporary LAHOSs. It is further the first to undertake a national survey targeting all English LAHOSs to assess service provision in the current austere political climate, as far as the author is aware. More specifically it is the first to apply a SLB framework at the outset to English LAHOSs and utilise qualitative techniques to assess public sector delivery in general terms for older service users. The following three sections highlight each of these contributions in further detail.

Application of the Street Level Bureaucrat framework

Based on previous research in the area of policy implementation it was judged that an investigation into LAHOS delivery would benefit from a conceptual framework which could describe and explain how and why policy contravention may occur and to guide possible solutions. As noted, this project is the first to apply Lipsky’s (1980, 1971) SLB perspective to consider the quality of LAHOSs for older service users. Studies which have concentrated on frontline LAHOSs have generally honed in on specific areas, such as Lidstone’s (1994) investigation into the means by which rationing behaviour may impact upon service outcomes. Other research has focused on the ways in which specific areas of law are interpreted, such as assessment of vulnerability on the basis of health issues (Bretherton et al 2013; Hunter et al 2007). Yet other scholars have considered aspects of frontline delivery, but within an overall framework that was primarily interested in the experiences of literally homeless populations. One example of this is Bowpitt et al’s (2011) discovery that LAHOS assessments were insufficiently conducted when researching multiple exclusion homelessness.

The most prevalent explorations around policy implementation in LAHOSs are those which report gatekeeping practices (for the purposes of this thesis action by frontline workers to actively impede statutory presentations are collectively referred to as gatekeeping). Much of the literature with an interest in this area tends to be descriptive in nature and is not generally
informed by a theoretical perspective. One possible reason for this is that a large amount of research into LAHOS delivery has been commissioned by third sector organisations (Pannell and Palmer 2004), particularly Crisis (for example Cheeseman 2011; Reeve and Batty 2011; Brent Homeless Users Group 2009; Rashleigh 2005), or Government departments (Pawson 2007; Pawson et al 2006; Niner 1989) who are perhaps more likely to expect an applied approach to understanding legal interpretation and service provision on the frontline. The literature which demonstrated the closest parallels to that of the SLB (Cowan 2011) is commonly referred to as a socio-legal perspective. This framework is chiefly applied by scholars working in the discipline of law and highlights where divergent application of policy directives in frontline LAHOSs may lead to negative outcomes for service users (Cowan 2011; Cowan and Halliday 2003; Halliday 2000; Loveland 1991).

In line with the main thread of Lipsky’s argument, the literature has shown how inadequate resources and political pressure to keep statutory homelessness low have resulted in a misapplication of housing policy in LAHOSs. This has led to households receiving incorrect advice or being sent away with little or no assistance (Pawson and Davidson 2007, p14). This lends support to Cowan’s (2011) contention that the contextual environment in LAHOSs will prove more influential than the law itself when policy is disseminated at the frontline. However, it is important to highlight that misinterpretation was not necessarily attributed to deliberative acts; for example inadequacies in legal training were also found to lead to misuse of policy directives (these arguments are considered in some detail in Chapter Three).

Nevertheless, whether intentional or otherwise, the evidence shows that misuse of policy directives may cause preventable homelessness and thus forms the principal focus of this thesis. It is argued that LAHOS decision makers face a persistent dilemma when delivering the chief element of the role. That is, the assistance of eligible households who require help cannot realistically be achieved with the tools available to deliver it (Lipsky 1980). The evolution of housing legislation is considered in further detail in Chapter Two and its implementation in Chapter Three. The main SLB themes, as they relate to LAHOSs, are illustrated in Figure 1.1. The top of Figure 1.1 refers to how a given officer’s day to day role may be driven by objectives within, and relationships around, the local authority organisation. The bottom shows broad macro (mainly political) influents, which interweave at the organisational (meso) level.
The focus on older service users

Although in some cases particular causations of homelessness, such as the experience of mental ill health (Hunter 2007) will cut across age groups it is argued, as highlighted above, that embedding services for older people in generalist provision is unsuitable and will not adequately meet their needs (Pannell and Palmer 2004). Where scholars have considered LAHOS provision for older people in general terms this has tended to be via retrospective accounts from the standpoint of the homeless rather than public service providers. The aim is to bridge this gap by seeking to understand the quality of service provision for older people from the perspective of LAHOS professionals who assess and deliver services to this group. It is, however, recognised that the experiences of older people who fall through the net and become literally homeless are important and a detailed account of studies in this area is covered in Chapter Three.

Whilst there has been some research into older people who experience homelessness in England, for example the barriers faced by older women who flee domestic violence (Blood 2004) and roofless older people (Pannell and Palmer 2004; St Mungos 2004; Kitchen and Welsh 1998; Crane and Warnes 1997) academic insights have for the most part been neglected or marginalised (Crane et al 2004b; Heywood et al 2002, p155; Cohen 1999). Only one qualitative investigation was found on implementation in English LAHOSs which centred on older people affected by homelessness. This study was narrower in scope than this
project as it concentrated on older women who became homeless for a specific reason (domestic violence) (Blood 2004). Further, previous investigations which considered how decision makers interpret housing policy in respect of vulnerability due to older age did not provide a detailed analysis around why different interpretations were found. In the first case this was due to limitations of the research method adopted and in respect of the second, older service users were not the chief concern. For example, although Hawes (1999) investigated variation in priority need assessments due to old age; this was done via a survey so provided little insight into the reasons why interpretations may differ. Niner (1989) also explored vulnerability and older age, but this was not the main focus of her research, so detailed reasoning for divergent decision making patterns was not explored. These debates alongside a more comprehensive exploration of the literature relating to homelessness and older people are discussed in Chapter Three. A detailed account of what is meant by an older LAHOS user for the purposes of this thesis is provided below.

**National baseline survey of current service provision**

A baseline survey was conducted among all LAHOSs in England which sought the views of a large number of public sector employees. As far as the author is aware a survey of this nature has not been attempted elsewhere and provided a unique insight into the types of challenges that LAHOSs are facing. It showed that funding cuts and rising homelessness levels had caused widespread problems, which were then explored further in the qualitative interviews. Employees based in over two thirds of LAHOSs completed the survey and the researcher is confident this response rate ensured a reasonable distribution of authority types. The next section provides a more comprehensive justification for the methods selected, which is further expanded upon in Chapter Four.

**Summary of the research methods employed**

As this thesis aims to provide a broad picture of the current LAHOS environment alongside a rich contextualisation of its frontline delivery processes, a mixture of quantitative and qualitative methods were chosen. This involved a national survey and semi structured interviews in an individual and group setting. It was felt that this wider assessment of provision was needed, both to contextualise the delivery environment and supply information around how determinations of vulnerability and resource scarcity may impact upon service quality at a national level. It was further able to explore localised decision making processes
and availability of prevention schemes or legal assistance for service users who wished to challenge decisions. In relation to older people it investigated how priority need is determined, sought views around current legislation in this area and asked what specialised services, if any, were available.

The survey demonstrated that disparity in service delivery and legal interpretations were occurring on a wide scale and thus lent additional support to subsequent interview findings which probed this in greater detail. It also supplied valuable information around how specific authorities may differ in terms of size, geographic remit and on other levels (this is discussed further in Chapter Four). The follow up semi structured interviews presented a more in-depth appreciation of how employees were coping in response to the pressures highlighted in the survey alongside why divergent patterns in terms of interpretation, delivery and services offered existed. Alongside this a small number of third sector organisations (TSO’s) were interviewed around the same topics, to provide a sense of how frontline delivery in LAHOSs was perceived by those charged with questioning or appealing specific decisions (though it must be stressed this was not a representative sample and cannot be generalised to all organisations who challenge decisions). Overall the methodology adopted showed that the illegitimate use of discretion was influenced by a mixture of central and organisational pressures, legal ambiguity and to a lesser extent, personal values. The following sections provide an overview of the main areas discussed in the thesis, starting with a more detailed description of LAHOSs (which is expanded upon in Chapter Two) and homelessness. This is followed by an initial look at implementation studies, Lipsky’s SLB (covered in greater detail in Chapters Two, Three and subsequent fieldwork discussions) and finally, a summary of what is meant by an older LAHOS user.

**Local Authority Housing Option Services**

In broad terms LAHOSs are required to prevent homelessness, provide housing advice and make statutory homelessness assessments. The Housing Act 1996 (amended 2002, Parliament 2006) forms the main statutory underpinning of the role and regular caselaw updates flesh this out. Homelessness is increasing in many parts of Europe due to a mixture of effects resulting from an ongoing economic downturn and political austerity measures (FEANTSA 2012). Thus public services in other countries may find it necessary to reshape policy directives to protect diminishing resource levels. However, English LAHOSs are the focus
due to the unique evolution of homelessness policy which confers specific responsibilities to public services and enforceable rights to settled accommodation (Fitzpatrick and Watts 2010) not in evidence anywhere else in the world, save for parts of the UK. Yet in respect of the latter, although England does share some similarities to homelessness services based in Scotland, Wales and Northern Ireland, each have employed devolved powers to develop distinct systems which are not directly comparable (for example Scotland no longer operate a priority need policy in respect of homeless service users). However, and as touched upon above, while theoretically English LAHOS users enjoy greater legal protection in the event of homelessness, it has been questioned whether these rights can be effectively exercised in the event of a negative or absent decision (Fitzpatrick and Watts 2010). Scholarly research which has uncovered evidence of gatekeeping (discussed in Chapters Three and Seven) lends strong support to this argument.

In a similar vein older people who experience housing difficulty in England may have comparable experiences to those in other developed nations. For instance homelessness among people over 50 is escalating in countries such as Australia, Japan and the USA, due in part to similar shifts in economic or market conditions (Kushel 2012; Crane et al 2010; National Coalition for the Homeless 2009). However, although international studies are touched upon where relevant, this project chiefly concentrates on potential or actual users of English LAHOSs, which essentially limits its reach.

Since the late 1990s the primary political imperative has been to develop effective homeless prevention strategies (Crane et al 2006, p156). Homelessness prevention is defined as:

- Assisting households to remain in their existing accommodation
- Delaying a household losing their current accommodation until an alternative can be sought
- Procurement of alternative accommodation (ODPM 2005a)

The so-called ‘prevention agenda’ was coupled with strict targets relating to the reduction of statutory homelessness acceptances and use of temporary accommodation (ODPM 2005b), which is argued by many commentators to have contributed toward the likelihood of LAHOSs engaging in unlawful behaviour in an attempt to ration services. The main
principles of the prevention agenda are discussed in Chapter Two and its impact on service delivery is considered in Chapter Three. In order to contextualise discussions relating to service delivery a brief overview of the five legal tests LAHOSs must apply when a household presents as statutorily homeless are provided:

1. Eligibility: this relates to checks that must be made to ensure applicants have a legal right to make an application as a homeless person; this may refer to foreign nationals or repatriated British Citizens.

2. Homeless: this refers to the assessment as to whether a household is homeless or threatened as such within 28 days. In practice this has proved contentious, particularly in cases where someone is living in unsuitable conditions, or has accommodation available to them that may not be reasonable to occupy.

3. Priority Need: the law confers that particular individuals or households may be viewed as vulnerable for specific reasons. The more straightforward categories where this test is satisfied relate to households where someone is pregnant or has dependent children, the under 18s, a care leaver under 21, or loss of home due to a natural disaster. The areas which require a more subjective application of discretion and are thus more pertinent to this thesis include groups who may be assessed as vulnerable due to old age, physical or mental health, institutionalisation, domestic violence, harassment, a care leaver over 21, or for a special reason.

4. Intentionality: this seeks to determine if a household has made themselves homeless due to a deliberate act or omission, if a LAHOS reaches this conclusion a full duty is not owed.

5. Local Connection: generally, for someone to pass this test they must have lived in the area in which they have approached as homeless for six months in 12, or three in five on a settled basis, have meaningful employment in the area (this alone has generated much caselaw, particularly in the case of European applicants), have first blood relatives who have resided on a settled basis in the area for over five years, or for a special reason (for example they have no connection anywhere, or are unable to return to the area of connection due to violence) (Parliament 1996).

In theory a practitioner would be required to apply each test and make a decision on the basis of the outcome at every juncture. If an applicant fails any of the first four assessments, the LAHOS will only be required to provide advice and assistance (if the applicant has no
assessed local connection, they will be referred to the appropriate authority). If all conditions are met the LAHOS will have a duty to ensure that suitable accommodation is made available to the applicant. However, as touched upon above and discussed in some detail in Chapter Three, it has been found that each of these tests may be utilised to discourage statutory homeless applications.

**Policy delivery and legal guidance**

This section provides an introduction to the Homeless Code of Guidance (DCLG 2006) and Pereira test (EWCA863 1999); the former is a supplementary document to the Housing Act, and the latter is an area of caselaw which LAHOSs must give regard to alongside the main Housing Act. Practitioners generally refer to the Code of Guidance to direct decision making, it is essentially designed to be a more user friendly version of the Housing Act itself and although it directs LAHOSs to interpret policy areas in a certain way, practitioners are not necessarily required to do so. As with many legislative documents the concepts adopted to steer decision making are vague and interpretation has been found to vary widely within LAHOSs (Jacobs et al 1999). For example the guidance makes frequent reference to terms such as ‘reasonableness’ or ‘vulnerability’, yet in practice many LAHOSs are unsure how to apply this when assessing if a duty is owed to certain groups (see chapter Three). For instance ‘vulnerability’ underpins the main assessment of priority need for applicants who fit into more subjective categories, such as older people. There is further an argument that the term is entrenched with that of the deserving poor (Brown 2012, p49), which arguably may indicate that those seeking homelessness services who are assessed as non vulnerable will be viewed as ‘undeserving’. Acknowledging the discursive power of vulnerability is important, particularly as the rationing of services can be justified in light of limited economic resources if it can be conveyed to citizens that only households judged this way are deserving of assistance (Brown 2012).

As housing policy tends to leave the onus of interpretation on LAHOS organisations and by extension, individual practitioners, much of its translation is guided by caselaw resulting from decisions being challenged in the courts. The main area of caselaw that decision makers must give regard to when assessing vulnerability (and is incorporated into the Code of Guidance) is the Pereira test (EWCA863 Court of Appeal 1999); this directs that when deliberating priority need:
It is a matter of judgement whether the applicant’s circumstances make him or her vulnerable. When determining whether an applicant is vulnerable, the local authority should consider whether, when homeless, the applicant would be less able to fend for him/herself than an ordinary homeless person so that he or she would suffer injury or detriment, in circumstances where a less vulnerable person would be able to cope without harmful effects (Para Three)

Although the stated aim of caselaw is to clarify areas of the main Housing Act, two problems are identified. Firstly, it potentially elicits numerous meanings due to its broad and ambiguous focus and secondly, it gives rise to the necessity for practitioners to employ the measure hypothetically (Cowan 2011). It seems reasonable to suggest that applying a test of vulnerability giving regard to an outcome that has not occurred will increase the likelihood of divergent interpretations at the local level. In other words, if a person threatened with homelessness presented to all authorities in England with identical circumstances, and the Pereira test was applied, it is unlikely the same conclusion would be reached in each case. There is considerable evidence to support this assertion, which is considered in Chapters Three, Six and Eight. It must be emphasised here that divergent decision making is not in itself at issue, so long as it is the result of individual (or organisational level) interpretation of housing policy, determined by an officer furnished with the ability to apply it. As stressed above, this thesis aims to challenge the ‘illegitimate’ use of discretion, particularly in cases where determinations have little relationship to legal directives.

Statutory definition of vulnerability due to older age
The homeless Code of Guidance is specific in its classification of an older person insomuch as it provides a definitive divide, set at 60 years old. Yet guidance on defining vulnerability on the basis of older age is ambiguous, whereby decision makers are advised:

Old age alone is not sufficient for the applicant to be deemed vulnerable. However, it may be that as a result of old age the applicant would be less able to fend for him or herself ... All applications from people aged over 60 need to be considered carefully, particularly where the applicant is leaving tied accommodation. However, housing authorities should not use 60 (or any other age) as a fixed age beyond which vulnerability occurs automatically (or below which it can be ruled out); each case will need to be considered in the light of the individual circumstances (DCLG 2006, p96)

Within the guide there is no reference as to why the age of 60 should be used as a cut off point; the futility of setting an age benchmark when the recommendation states that priority
should be conferred due to additional vulnerabilities is therefore questioned. Alongside this apparently ineffectual use of a chronological cut off it could further be argued that setting a specific age at which someone becomes old is perhaps discriminatory if it is not supported by sufficient reasoning. That is not to say that the process of ageing should be ignored, as findings show that older people will suffer detriment as a result of homelessness to a larger extent than younger cohorts. But, rather, that use of a chronological age should be justified. This central argument is returned to below and is explored further in Chapter Three.

**Homelessness: causes and conceptualisations**

*Causes of homelessness*

Homelessness, in terms of how it should be measured or defined has been subject to considerable debate. Although Chapter Three engages in scholarly work around the causes of homelessness in respect of older people, the primary intention of this thesis is not to provide an enhanced understanding of homelessness. Rather; the aim is to improve comprehension of the statutory assistance available to households affected by homelessness. However, it is recognised that the conceptualisation of homelessness, both in terms of its types and causes, is important. This is because a widespread adoption of specific assumptions will have some level of impact on how policy makers frame legislative responses (Jacobs et al 1999) which in turn may influence how policies are implemented. In terms of theoretical development around the causes of homelessness there has been a move away from more rudimentary explanations, such as pathological arguments which blame the individual, to more complex portrayals that focus on how structure and agency interact, or the multifaceted nature of homelessness (Somerville 2013, 1994).

This multi-dimensional focus can be recognised in the previous New Labour administration’s ‘social exclusion’ and Supporting People agendas, whereby it was recognised that effectively tackling homelessness required a wider focus on areas such as health and employment (Dobson and McNeil 2011). In a similar vein policy documents such as ‘More than a Roof’ (Chapter Two) adopted a wider, more holistic approach to confronting the causes and potential solutions to homelessness in England (Dobson and McNeil 2011, p584). However, whilst its main principles were sound, the social exclusion agenda in particular was criticised due to the coercive elements which were built into its dissemination (for example Fitzpatrick
and Jones 2005). Although the social exclusion concept has ceased to exist under the Coalition Government, its wider focus, at least on the surface, has remained. The term ‘multiple disadvantage’ is now used (Dobson and McNeil 2011, p587), which (at least in theory), retains individual and structural elements when framing the cause of homelessness (see Chapter Two).

For the purposes of this thesis the definition of homelessness adopted by Warnes and Crane (2006) in their study of people over 50 is applied:

[H]omelessness is a function of structural and policy factors, health and welfare service organisation and delivery deficiencies, and personal problems, incapacities and behaviour (p402)

Although no definition will be all-encompassing, this succinctly incorporates the composite nature of homelessness, highlighting that potential causations may emanate from differing spheres or be related to shortcomings in policy areas not directly related to housing. Connected to the need for awareness around the complex potential causations of homelessness are debates which consider the forms it might take. It is argued that policy makers tend to equate homelessness in statutory (Pannell and Palmer 2004, p37; Neale 1997, p48), or roofless terms (Gov.UK n.d). In respect of the former this may be due to the Government’s legal duty to secure housing for this group (McNaughton 2008, p8; Neale 1997, p48), the latter can arguably be viewed as an attempt to tackle more visible manifestations of a social problem (see below). Yet although scholarly studies tend to focus on literally homeless households there is a growing recognition that homelessness comes in different forms, whereby the most numerous type, the ‘hidden homeless’ are invisible to the public gaze (discussed below). The remainder of this section provides a brief outline of the main types of homelessness which are discussed in the forthcoming chapters.

**Types of homelessness**

Homelessness is generally broken down into three broad categories, statutory, rooflessness (or literally) and hidden. Statutory homelessness refers to households who have made a formal application and a main duty to re-house has been agreed. As local authorities are required to record accepted homeless households, statistics for this group are the most readily available. Street homelessness refers to someone who is literally without accommodation, a person who is roofless; they may reside in hostel accommodation or sleep rough. It has been
argued that roofless people seldom seek statutory assistance (Homeless Link 2012; Kitchen and Welsh 1998, p12). Further, though there is no satisfactory measure of the prevalence of rough sleeping (Reeve and Batty 2011, p10; Homeless Link 2010a) it is widely accepted that they are in fact less numerous than statutory (Thomas 2012) or hidden homeless cohorts (Reeve and Batty 2011, p1). Despite this, scholarly investigations disproportionately address roofless groups which as highlighted above, may be attributable to its status as a severe form of homelessness. Further, the fact that concealed homelessness is less observed or observable is likely to be a contributing factor toward its relative neglect in scholarly spheres (Reeve and Batty 2011) as accessing this group is so problematic (Buckingham 2010). The hidden homeless refer to those who live in unsuitable accommodation; this could be with friends or relatives or may refer to the poor condition of a home they either rent or own. Many concealed homeless households are not owed a statutory duty, and some may approach LAHOSs for advice and prevention services. The extent and prevalence of hidden homelessness can only be estimated at best and will differ dependant on how it is defined by a given commentator. The pervasiveness of hidden homelessness, specifically among older people, is discussed in some detail in Chapter Three.

An implementation perspective
Lipsky’s unique implementation perspective is employed as it offers a developed explanatory tool in respect of the type of organisation for which this thesis is focused; but its principles are adopted with the caveat that no framework can offer a perfect account of all nuances in service delivery. This is because frontline officers themselves are heterogeneous, making it unfeasible to apply a one size fits all theory of bureaucratic behaviour, even within a single organisation. For example each individual may interpret and apply their role in a unique way (Brehm and Gates 1997) and equally each organisation will have unique aims and priorities (Meyers and Vorsanger 2003). Lipsky (1971) coined the term SLB to refer to those at delivery level who exercised discretion by manipulating interpretation of policy in the course of their day to day role. Street Level Bureaucracies refer to the public sector organisations in which SLB’s are employed (Lipsky 1980, p4). The exercise of discretion was predominantly conceptualised as a negative action, viewed as being primarily in response to pressures embedded within the organisation to ration demand. Alongside a perennial lack of resources, the necessity to limit services was assessed as being driven by related issues such as performance targets or a heavy workload. In turn bureaucrats were judged as having the
ability to reshape policy directives to fit these requirements due to the ambiguous and contradictory nature of policy directives (Lipsky 1971, p394).

Lipsky’s SLB conceptual framework\(^1\) broadly rests within an incremental paradigm, which states that policy development essentially evolves slowly due to an inherent recognition that it is shaped throughout the process. Other researchers have made individual elements of the journey the main focus, such as the conception of policy (Grube 2012), or its implementation (Lipsky 1971; Prottas 1979). The chief focus of this thesis can be described as an implementation perspective due to its specific focus on public sector employees who work with policy at the middle and lower end of the procedural scale (Hill 2009, p257). Implementation perspectives emanate from a broad range of subject areas, some have been briefly covered above, but others include public administration, management, regulatory enforcement, principal agent theory, new institutionalisation, governance, networks, and policy design alongside street level bureaucracy (Winter 2003, p206). Further, numerous frameworks and research focuses coexist under the umbrella of implementation studies, thus scholars who utilise this approach may only have the initial focus on delivery of policy or a service in common.

LAHOSs are generally referred to as an organisation and Simon’s (1957, pxvi) succinct conceptualisation, viewing it as ‘the complex pattern of communications and other relations in a group of human beings’ is followed. Accordingly LAHOSs are made up of frontline decision makers, peers, supervisory staff, councillors and more senior members of the local authority alongside central policy makers and the numerous individuals or external groups who may possess the ability to in some way influence and shape the service. Throughout this thesis terms such as NPM or networks are used to discuss particular policy process perspectives; these can broadly be subsumed under the term ‘governance’, which Hupe and Hill (2007, p287) describe as ‘the choices about ways of governing, made at several layers within a policy process, often simultaneously’. This definition succinctly captures the difficulty of assessing how policy is ‘made’, due to the manifold potential for its meaning and purpose to be reshaped throughout its journey.

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\(^1\) The term framework and model are used interchangeably to discuss Lipsky’s street level bureaucrat, though it has been argued that each has slightly distinctive, yet contested, meanings (Cairney 2013). For example Cairney (2013) suggested that frameworks refer to the identity of relevant concepts which help organise analysis and theoretical comparison and models make particular assumptions about specific objects of enquiry.
Who is an older service user?

It was argued above that despite the homeless Code of Guidance recommending persons over 60 should be ‘considered carefully’ (DCLG 2006, p96) LAHOS decision makers are not required to award priority need on the basis of older age. Thus the process of determining when older age renders a person vulnerable is essentially a subjective one. Herring (2009) argued that a definitive benchmark was unrealistic due to the variation of older people and their circumstances, concluding that people of a similar age may have nothing at all in common save for their birthdate (Herring 2009, p2). Yet despite this valid point nearly all organisations and researchers refer to a chronological cut-off point when operationalising older age. For example the World Health Organisation (WHO) (2002, p4) adopted over 60 whilst accepting this could not adequately account for how the ageing process affects different people and cultures. Moreover, identifying when someone should be treated as potentially vulnerable due to age will be dependent on the particular circumstances of the individual.

Albeit with a caveat that it is by no means optimal, an age at which a homeless person should ordinarily be classed as ‘older’ is employed. Following the benchmark adopted by scholars who investigate older homelessness, a relatively young age of 50 is utilised. This reflects research evidence demonstrating that premature ageing is an inevitable consequence of rooflessness (UK Coalition of Older Homelessness 2011; Pannell 2002b; Cohen et al 2001; Crane and Warnes 1997). For example Wilson (1995, p8) pointed out that older people would struggle to live on the streets in comparison to younger cohorts due to the inescapable fact that they will tend to be less physically strong. Furthermore, Crisis (Thomas 2012) put the average age of death for street homeless men at 47 years; this was set even lower for women, at 43 years. It was additionally found that 55-64 year olds had from 1.5 to nearly three times the mortality rate of their housed counterparts. These figures remain unchanged from an investigation of older street homelessness conducted over 15 years ago (Kitchen and Welsh 1998)\(^2\). The evidence cited above draws attention to the fact that ageing is accelerated for those who become street homeless. Alongside this the main focus is on LAHOS users under retirement age; as will be covered in Chapter Three, this group is commonly viewed as less likely to be assessed as vulnerable and more at risk of falling between the gaps of provision commonly aimed at younger or much older cohorts. Moreover, the literature suggests that the

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\(^2\) Although these assertions are without a doubt stark, it is pertinent to note that they refer to long term rooflessness rather than older people who become homeless for the first time who may not exhibit such a dramatic morbidity rate (Pannell and Palmer 2004, p20).
‘younger old’ tend to be incorrectly viewed as an indistinct group whose needs can be assimilated into generic provision (see below).

The principal focus on older age does not imply that individual circumstances such as wealth and health or characteristics such as ethnicity and gender are not important, as there are unquestionably differences between ‘younger old’ age groups (as there are amongst the ‘oldest old’). This thesis concurs with the WHO’s (2002, p40) assertion that ‘older age often exacerbates other pre-existing inequalities based on race, ethnicity or gender’. If gender is taken as an example it could be argued that the worldwide experiences of older women will be distinct to men due, amongst other things, to their overall economic disadvantage (WHO 2002). With regard to LAHOS delivery, scholars have shown that gender (of all ages) may impact upon decision making, although the findings do not support each other. For example Cramer (2005) argued that women were provided with favourable treatment in comparison to men, whereby Watson and Austerberry (1986) countered that the women in their study had experienced negative discrimination. In summary, individual characteristics or circumstances matter and relevant studies which focus on homelessness within specific cohorts of older people are discussed. However, a detailed comparison between different groups of older people goes beyond the scope of this thesis, though inferences can be made in some cases, such as when domestic violence is discussed in Chapter Seven.

Although this thesis does not aim to contribute to debates around how older age should be defined it is recognised that, as with homelessness, conceptualisation will be inextricably linked to how policy is devised or disseminated. While biological factors are undoubtedly an important determinant of the ageing process (WHO 2002) it has been argued that ‘old age’ is socially constructed (Herring 2009; Heywood et al 2002, p22) and further, the actions of an older person can potentially be impeded by policy areas such as those relating to employment (Walker 2005). It has moreover been claimed that ageism is entrenched in housing policy (Herring 2009), which gives cause for concern in light of findings which suggest that the housing choices available to older people are inextricably linked to the discursive labels assigned to them (Clapham 2002). For example and as touched upon above (and returned to in Chapter Three), older people are commonly viewed as being unaffected by homelessness, which likely accounts for its scant political attention in comparison to younger cohorts (DCLG 2006). Yet if the needs of older people are not recognised in the political realm this may result in a lack of targeted provision (this is explored in later, fieldwork chapters).
An active ageing framework

While policies relating to its main principles are yet to be successfully incorporated at a national or European level (Foster and Walker 2014, p5) the ‘active ageing’ paradigm most closely reflects the author’s view of how politicians should respond to an ageing population. It is further acknowledged, at least at the European level, as offering the most developed framework to effectively legislate for an ageing population (Foster and Walker 2014). The WHO’s (2013) conception of active ageing is followed due to its broad, inclusive nature, whereby the focus is on the individual rather than the contribution they can make to society:

Active ageing is the process of optimizing opportunities for health, participation and security in order to enhance quality of life as people age... the word “active” refers to continuing participation in social, economic, cultural, spiritual and civic affairs, not just the ability to be physically active or to participate in the labour force. Older people who retire from work, ill or live with disabilities can remain active contributors to their families, peers, communities and nations (Para Three)

An Active Ageing approach further supports a life course perspective which stresses that a person’s needs are qualitatively distinct throughout the various stages of the life cycle (WHO 2002, p14 and see below). This is moreover reminiscent of a pathway approach to homelessness, which is covered in some detail in Chapter Three. Yet the active ageing framework, whose main elements were developed in the USA during the 1960s (Walker 2002) has become all encompassing in recent years, whereby meanings within are fluid, dependent to a large extent on the definer (Walker and Maltby 2012). For example it has been argued that European political discourse around the ‘active’ in active ageing focuses disproportionately on the economic component, or being ‘actively economic’, whilst largely ignoring other important areas, such as health or wellbeing issues (Walker and Maltby 2012). There is further a risk that ‘economistic’ definitions fail to capture the reality that older people are qualitatively distinct from younger cohorts (Biggs and Kimberley 2013) and experience unique challenges specific to ageing (WHO 2002). It is thus argued that treating the needs of older people as merely an extension of the young is insufficient (Biggs and Kimberley 2013; WHO 2002), which has tended to be the case in respect of homelessness legislation, as highlighted above. An additional point to consider is that the active ageing paradigm has a tendency to focus on the positive elements of ageing, to the detriment of the oldest old, who would be unlikely to recognise themselves within its core defining elements (Foster and Walker 2014).
However, whichever definition is adopted, it is hard to dispute that losing one’s home will impinge on an older person’s ability to ‘age actively’ and as the above research findings show, homelessness is associated with ill health and dramatically reduced life expectancy. Thus participation is diminished and the security which comes with a home does not exist. In summary what it means to be an ‘older’ person is a complex mesh whereby chronological elements may become secondary to how political, economic and social forces impact upon the life chances of a given individual. In light of this, experiences of ageing are treated as unique to each individual but with an understanding that their needs are different to those of younger age groups.

**Summary of main chapters**

Chapter Two begins by highlighting the main areas of housing and welfare legislation which have shaped present day LAHOSs. It then goes on to discuss specific paradigms of the policy process before implementation perspectives are explored in more detail. This chapter also considers important questions around the nature of power in frontline LAHOSs. Following this a detailed discussion and justification for adopting Lipsky’s SLB conceptual framework is given, alongside a deliberation of the scholarly debates around its application.

Chapter Three discusses research on policy implementation in frontline LAHOSs which found evidence of unlawful gatekeeping and misappropriation of housing policy due to both wilful and unintended causes. It then goes on to highlight evidence showing why these practices have an adverse affect on households who seek help due to the threat of homelessness. It next touches upon the imperative role of the non statutory legal sector in challenging LAHOSs, whilst stressing the longstanding problems in terms of funding experienced by this type of organisation. The chapter finishes by highlighting LAHOS service delivery in respect of older people, beginning with a look at the causes of homelessness before concentrating on relevant policy and scholarly research in this area.

Chapter Four discusses the main research strategy and its focus, devoting considerable attention to the fieldwork environments, justifying why a multi level strategy was adopted to answer the main research questions. It further contextualises the methodology underpinning the thesis, which follows a constructionist epistemology. It also provides a rationale as to why the incorporation of quantitative methods is not incongruous to an interpretative paradigm. The researcher contextualises her place within the research project throughout the chapter,
outlining how previous professional knowledge and experience added value to both the research design and analysis of findings. It finishes by discussing the ethical implications and analysis strategy.

Chapter Five concentrates on the relevant findings of the baseline national survey and looks at how practitioners are coping and delivering a service in a politically austere environment, alongside service availability and interpretations of vulnerability for older people. It highlights where individual LAHOSs showed wide disparity in terms of knowledge and interpretation of relevant legislation and guidance, who made decisions and the level of services offered. It depicts a picture of an organisation struggling with increased workloads, inadequate resources and a perennial shortage of suitable options for those affected by homelessness. In respect of older people it discusses findings which showed inconsistent and low levels of provision alongside uneven interpretation of vulnerability.

Chapters Six and Seven adapt Lipsky’s SLB framework to aid discussion of the practitioner interviews. Overall the findings support those of the survey and show that resource shortages negatively impacted on quality of service provided. It further showed that interpretation and delivery of housing policy differed. A variety of causations were identified and each is discussed in detail, but insufficient provisions underpinned most examples of unlawful or discrepant behaviours. Chapter Six explores the exercise of discretion and the ways in which training, scrutiny and workload issues could impede the positive utilisation of role specialisation. Chapter Seven highlights the ways in which service users are differentiated; demonstrating how in many cases this process may occur even before a given household approaches LAHOSs. It further explores other potential areas where rationing may occur, with a focus on screening and gatekeeping. This chapter finishes by discussing the group interview with a small number of TSO’s, who broadly echoed LAHOSs concerns in terms of where services were failing households at threat of homelessness. Both chapters report evidence of stereotypical frames of reference used to depict older people, disparity in terms of how vulnerability for this group was assessed and a shortage of specialist temporary accommodation or tailored services. There were mixtures of reasons for each finding which are considered.

Chapter Eight brings together the literature and fieldwork and shows how an SLB perspective provided a useful explanatory framework in respect of policy delivery in LAHOSs, drawing
chiefly on findings connecting specific coping mechanisms to the reshaping of housing policy by frontline workers. It further identifies where Lipsky’s framework is less useful and engages in debate based on scholars who reconceptualised the SLB following research in specific settings. Overall it uncovered that current LAHOS provision for older service users is for the most part inadequate and detailed reasons are provided for this assertion.

The conclusion advocates a number of policy recommendations based on the research findings. The main suggestions relate to general changes which give greater attention to training issues, resource pressures, unrealistic organisational led targets and look toward providing a more user led service where the specialist knowledge of frontline LAHOSs are utilised to drive services forward. It further asserts that delivery of specific initiatives should be made fairer and attention given to the Localism Act based on findings that it may contribute toward gatekeeping behaviours due to its ambiguous, discretionary nature. It is moreover highlighted that TSO’s and similar legal help organisations are not being adequately supported despite the fact they provide invaluable help to households who wish to challenge LAHOS decisions. In respect of older people it is argued that the Housing Act should be amended to provide greater clarity around vulnerability. It also considers ways to improve local knowledge of available services and makes suggestions for more specialist accommodation and initiatives aimed at older people. The thesis finishes by reflecting on the overall effectiveness of the research methodology and providing suggestions for future research.
CHAPTER TWO
The Policy Environment

Introduction
This chapter focuses on the development of LAHOSs, alongside a discussion of policy process perspectives. The first part considers relevant legislation, guidance documents and political shifts that have developed and shaped LAHOSs. It also touches upon the recent restructuring of welfare policy due to its intricate connection to homelessness risk factors (McNaughton 2008). Whilst a wide array of policy areas, such as those relating to health (DCLG 2011c), economic and employment policy may all potentially intertwine with housing outcomes (AgeUK 2011b; Homeless Link 2010a; Ravenhill 2008, p54; Anderson 1999, p161), due to the sheer volume of related policy areas only those which directly affect delivery in LAHOSs are covered in detail. The second part of the chapter traces the main perspectives that have attempted to elucidate the policy process before turning to theoretical debates around the ways in which power relations influence frontline policy outcomes. It finishes with a detailed account of the SLB conceptual framework, exploring research that has applied it to specific frontline settings, the aim being to foster an appreciation of the broader contexts in which Lipsky’s implementation model has been situated.

The evolution of Local Authority Housing Option Services

Housing policy development
The following five sections trace the main developments which had an impact on homelessness policy and practice, focusing on those which have taken place since the poor law (which for the most part ceased in the late 1940s). It should be borne in mind that alongside legal developments, legislation is essentially shaped by the ideological underpinnings of a given political party when in power, which in turn will impact on the ways in which laws develop and take shape. The prevailing argument amongst political theorists is that neoliberalism, in various guises, has remained the dominant theme over the last 30 years or so (Davies 2012; May et al 2005). But Pawson and Jacobs (2010, p78) have warned that treating neoliberalism as the pervading force framing contemporary politics is
not sufficient for examining policy implementation at a micro level, as it assumes that ideology is practiced at the frontline. The later discussion around frontline implementation supports this view, showing that the operation of policy is more complex than alluding to an overriding political imperative. An overview of the relevant policy and guidance documents discussed are laid out in Table 2.1.

Table 2.1: Overview of relevant legislation and guidance

<table>
<thead>
<tr>
<th>Year</th>
<th>Legislation or guidance</th>
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<tbody>
<tr>
<td>1948</td>
<td>National Assistance Act</td>
</tr>
<tr>
<td>1972</td>
<td>Local Government Act</td>
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<tr>
<td>1977</td>
<td>The Housing (homeless persons) Act</td>
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<tr>
<td>1985</td>
<td>The Housing Act</td>
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<tr>
<td>1986</td>
<td>Housing and Planning Act</td>
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<td>1996</td>
<td>The Housing Act</td>
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<tr>
<td>2002</td>
<td>The Homelessness Act</td>
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<tr>
<td>2002</td>
<td>The Homelessness Act (Priority Need for Accommodation) (England) Order</td>
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<tr>
<td>2003</td>
<td>More Than a Roof: a report into tackling homelessness</td>
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<tr>
<td>2005</td>
<td>Sustainable Communities: homes for all</td>
</tr>
<tr>
<td>2005</td>
<td>Sustainable Communities: settled homes; changing lives</td>
</tr>
<tr>
<td>2006</td>
<td>Homelessness Code of Guidance for Local Authorities</td>
</tr>
<tr>
<td>2011</td>
<td>The Localism Act</td>
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<tr>
<td>2012</td>
<td>The Welfare Reform Act</td>
</tr>
<tr>
<td>2012</td>
<td>Making Every Contact Count: A joint approach to preventing homelessness</td>
</tr>
<tr>
<td>2013</td>
<td>The Gold Standard Challenge</td>
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</table>

The National Assistance Act 1948 (HMSO 1948) was the first statute requiring local authorities to help specified homeless households. It was rather sparse, being chiefly concerned with crisis intervention and minimal short term aid to particular groups who became literally homeless. This Act stated that old age should be recognised when determining vulnerability, a principle which has persisted to the present day. The Local Government Act (1972) introduced the notion that local authorities should look to provide more settled accommodation, albeit on a discretionary basis (Somerville 1994, p167). The chief catalyst leading up to the Housing (homeless persons) Act 1977 (HMSO 1977) emanated from pressure exerted by the third sector in reaction to the plight of homeless households, coupled with the public sector’s persistent ignorance of the recommendations contained in the 1972 Local Government Act (Somerville 1994, p166). It has further been suggested that the television play ‘Cathy come Home’ raised awareness of homelessness and made it a politically salient issue at this time (Cowan 2011). The 1977 Act furnished specific
housing departments, in place of social services, with the main responsibility for tackling homeless households. Further, this Act effectively depoliticised homelessness, transforming it into a bureaucratic concern rather than a social problem (Somerville 1994, p171).

Although the 1977 Act did not compel authorities to provide eligible homeless households with their own housing stock, they were required to ensure that accepted applicants could access settled accommodation. It has been argued that as private rented or other types of tenure were unlikely to be viable at this time, local authority properties were normally allocated so that the discharge of duty function could be satisfied (Somerville 1994, p170). Homelessness services had been marginal up until the 1977 Housing Act, with charities or social services dealing with emergencies as they arose. This Act created a whole series of homelessness rights and furnished local authorities with prescribed responsibilities. For example it introduced the requirement to make homeless investigations into a person’s circumstances and introduced the five tests which were highlighted in Chapter One (HMSO 1977). The Conservative opposition were ideologically opposed to the Act, arguing that the state was becoming too entrenched in homelessness issues (Somerville 1994, p173).

Although the political inclinations of the main parties may have essentially shaped legislative shifts in homeless policy prior to this period, following the 1977 Act this became less discernable and as stated above, more incremental in nature; Hogwood and Peters (cited in Parsons 1995, p571) referred to this as ‘policy succession’. The Housing Act 1985 (Parliament 1985) retained the need to make enquiries and embodied the notion that LAHOSs should look to provide advice and assistance as well as emergency provision (although the principle of this existed in the 1977 Act, it became more explicit). The Housing and Planning Act 1986 factored in the reasonableness of accommodation and was a vital legislative acknowledgement that in some cases people should be viewed as homeless if they lived in unsuitable housing conditions.

The current policy environment

The Housing Act 1996 (Parliament 1996), passed during Conservative rule, forms the underpinning of LAHOSs to the present day, as does the amended Homelessness Act 2002 (passed by a Labour government). The 1996 Housing Act arguably enhanced the autonomy of homeless services as a whole by denying service users the right to appeal negative decisions externally by introducing an internal procedure (Cowan et al 2006, p382). Although
an internal review, if unsuccessful, can be challenged in court, it would need to be demonstrated that an officer has erred on a specific point of law (Parliament 1996), which as will be shown below and in the next Chapter, is by no means straightforward. Whilst the main rules which apply to the 1996 Housing Act and subsequent legislation introduced at the turn of this century was covered in Chapter One, the overriding political objectives underpinning it are now expanded.

Homelessness prevention

Whilst LAHOSs provided some, albeit limited prevention services by the mid 1980s (Dean et al 1996), the dramatic shift toward prevention programmes emerged at the turn of this century. Back in 1980 homeless acceptances in England stood at just over 60,000, this figure increased exponentially until it reached an all time high of 135,590 by 2003 (Pawson and Wilcox 2012); it was this dramatic escalation that triggered proactive prevention strategies (ODPM 2003). Concomitant to these changes, the number of households to be assessed as reaching the threshold of priority need was broadened (ODPM 2002). The Homelessness Act 2002 required LAHOSs to formulate and publish a strategy and encouraged them to devise a review of homelessness in their area. Its purpose was to encourage a broader interpretation of the housing options that should be available to households at threat of homelessness. LAHOSs were expected to work in partnership with other statutory departments and the voluntary sector (discussed in the next chapter) in an effort to reduce homelessness in their respective areas. The emphasis was very much on LAHOSs ensuring ‘all’ in housing need would have access to effective advice and assistance (Homelessness Act 2002). Furthermore, the Act provided that LAHOSs must ensure duty was discharged with an offer of secure accommodation if a statutorily homeless household required it. This undoubtedly added further pressure to local authority housing stock and may have served as yet another disincentive to accept a statutory duty unless absolutely necessary.

In the Same year the ODPM (2003) published ‘More than a roof’, which reiterated that homeless prevention must form the chief focus of LAHOS delivery. In 2005 the Government published two key documents: ‘Sustainable communities: homes for all’ (ODPM 2005a) and ‘Sustainable communities: settled homes; changing lives’ (ODPM 2005b). Within the published guidance were a number of specific targets that LAHOSs were required to meet to increase recorded preventions and correspondingly reduce statutory acceptances (discussed below). Extra funding was made available for prevention work (ODPM 2005a; 2005b) and
LAHOSs ring fenced on average eight times more monies toward this than statutory services (Shelter 2010). LAHOSs set up strategies such as bond or rent in advance initiatives, designed to assist people into private rented accommodation (DCLG 2006, p22; ODPM 2005a, p46) (however, despite this funding, recent welfare retrenchment measures have meant that a private rented tenure is increasingly difficult to access for low income groups, see below). The government also introduced programmes aimed at households who faced affordability issues in mortgaged properties (National Audit Office 2011, p4).

The updated Housing Act placed responsibility for devising ways of increasing prevention and reducing statutory homelessness on individual organisations. Correspondingly execution of schemes that aimed to restrict homeless applications was left to the judgment of the LAHOSs who administered them (Pawson 2007, p875). For example the rules set out for the Government Mortgage Rescue Scheme stated it needed to be determined that mortgage difficulties had occurred through no fault of the potential recipient, which is open to interpretation (Directgov n.d). It has been pointed out that escalation in the measurement of numerical outputs served as a tool of scrutiny to ensure prevention directives were adhered to (Pawson 2009, p94). This view is evident in light of Government targets set at this time which required LAHOSs to halve the use of temporary accommodation and end long term use of B&B for specified households by 2010 (ODPM 2005b).

On the surface centrally directed initiatives aimed at reducing statutory homelessness appeared to be successful insomuch as emergency accommodation use decreased and homelessness acceptances had reduced to a record low of under 50,000 by 2009 (Pawson and Wilcox 2012, p206), which was just over a third of those recorded in 2003 (Pawson and Wilcox 2012). Although these figures have begun a steady accent following the economic downturn, statutory homeless acceptances are still lower than those recorded at the turn of the century (DCLG 2014a). However, the aforementioned flexibility in how LAHOSs administer homeless prevention schemes has meant that in many cases only service users who fit specific criteria, such as being identified as priority need, are assisted (Jones and Pleace 2010; Pawson et al 2007, also, see Chapter Three). It has further been argued that prevention programmes tend to favour service users with little or no identified problems (Ravenhill 2008, p50). More specifically scholars have urged that caution be exercised before unquestioningly concluding that lower statutory acceptances were due to successful prevention outcomes for a number of reasons.
Firstly, it needs to be acknowledged that statistical information is collated within individual LAHOS organisations (Hawkey 2004, p19), so the reliability of data may be compromised due to different administrative and data gathering practices. Secondly, the quantitative measures that these conclusions rely upon do not tell us which households are no longer accepted as statutorily homeless and thus may not be a credible measure of the success of the prevention agenda (Pawson and Davidson 2007). Thirdly, it has been maintained that the prevention agenda emerged as a political cloak, the actual catalyst behind the panoply of initiatives being to reduce politically damaging homeless acceptance rates, rather than a genuine desire to assist those in housing difficulty (Lund 2011, p169). In support of this argument the main political targets prioritised lowering accepted homeless households, such as reducing applications or temporary accommodation, over tackling non priority or concealed homeless households. This is likely to at least partly explain why prevention initiatives tend to focus on groups who are classed as being in priority need for assistance, as touched upon above. The final point argues that rationing practices, such as gatekeeping, show that reductions in statutory homelessness figures cannot be taken at face value.

However, although scholars (discussed in Chapter Three) have attributed the prevention agenda to an increase in illegitimate discretionary practices, it is important to point out that earlier investigations have shown that gatekeeping is in fact a time-honoured response to the perennial scarcity and need to protect limited resources in LAHOSs (Evans 1999; Niner 1989). That said, the evidence suggests that increased pressure to reduce statutory homelessness is likely to increase the probability of gatekeeping being practiced. Ultimately, it has been argued that many cases of homelessness which could have been alleviated continue to fall through the net; particularly in the case of non priority single people (Reeve and Batty 2011; Jones and Pleace 2010; Crane et al 2006). These points lend weight to Loveland’s (1991, p13) argument that policy makers should acquire an appreciation of the execution process rather than be informed by national data, which offers additional support to the implementation perspective adopted by this thesis.

**Coalition Government led policy**

The prevention agenda has continued under the present Coalition Government and its latest strategy ‘Making every contact count: A joint approach to preventing homelessness’ (DCLG 2012b) repeats the key messages of earlier policy documents. Namely, it promotes a holistic, multi agency approach, the overall aim being to reduce statutory homelessness applications.
and use of specific forms of temporary accommodation. The document has been criticised for not addressing the lack of resources and failing to provide any measure that would hold individual local authorities to account if its stated objectives are not adhered to (Twinch 2012). This latter point is pertinent in light of evidence that LAHOSs do not necessarily follow political directives and this is discussed in the next chapter. Further, the Coalition has introduced an initiative which attempts to guide LAHOSs on the specific steps that should be taken to prevent homelessness and reduce temporary accommodation use (National Practitioner Support Service 2013). This so called ‘Gold Standard Challenge’ has echoes of the former Government’s ‘Regional Homeless Champions’ or ‘Beacons’ (Pawson 2009, p95). However, unlike comparable schemes introduced by the previous administration the Gold Standard Challenge is discretionary and preliminary reports claim that despite nearly all authorities assenting to apply its principles, only one had done so, with lack of time and resources being reported as the primary reason (Spurr 2013).

Although prevention funding continues to be made available (HM Government 2012), more recent policies which aim to tackle rising homelessness levels have tended to focus on rooflessness as opposed to those at threat thereof. Some examples include ‘No second night out’ (HM Government 2011) and a homelessness transition fund worth £20 million to be paid to TSO’s throughout the UK (Gov.UK n.d). Alongside this, a politically commissioned Ministerial Homelessness Working Group similarly concentrated on literal homelessness (Fitzpatrick et al 2011, p10). This is despite initial claims that its chief mandate was to investigate how to prevent rather than cure homelessness (HM Government 2012, p51). Moreover, the working group has not published any further information or apparently met since early 2013. It is accepted that rooflessness, as an extreme manifestation of homelessness, must be tackled. But it is nevertheless maintained that preventative measures can more effectively reduce street homelessness in the longer term.

**Political austerity**

Since the Coalition Government came to power in 2010 its main policy objective of reducing public spending has meant cuts to both central budgets and local authority departments. Correspondingly, spending toward housing and welfare is at its lowest level since 1945 (Nevin and Leather 2012, p14). Of particular concern to this project are the widespread findings that welfare retrenchment is leading to a rise in all types of homelessness (Gov.UK 2014; Fitzpatrick et al 2012; Homeless Link 2010b; Jones and Pleace 2010, p5). For instance
figures released by the DCLG (2013b) showed that official counts of street homelessness had risen by around a third since 2010 and statutory homelessness, despite experiencing a slight drop, had increased by around a quarter overall since 2008 (DCLG 2014a). Alongside this, statistics show that the total numbers of accepted homeless households are reducing exponentially. For example rejections on the basis of an assessment of non priority have doubled in the last 25 years (DCLG 2014a, p3; Pawson and Wilcox 2011, p209) and it is likely that a significant proportion (if not all) of affected households will remain homeless, albeit in its roofless or hidden forms. Furthermore, a high proportion of households who fall victim to particular welfare reform measures and subsequently seek LAHOSs will likely remain invisible (Fitzpatrick et al 2013). Moreover, figures published by the DCLG (2014a, p13) show a dramatic rise in the use of unsuitable out of area emergency accommodation, which was 36% higher in the first quarter of 2014 when compared to the previous year. This means that just over a fifth of total accepted homeless households were accommodated in another local authority district.

The aforementioned growth in homelessness is further projected to continue as the far-reaching consequences of reductions to local housing allowance (LHA) are realised (Crisis 2012b; Homeless Link 2010b). For example it has been predicted that despite Southern areas being disproportionately affected by welfare reform (Fitzpatrick et al 2013), LHA retrenchment will lead to private rented tenures becoming ‘very unaffordable’ for low income households in many Northern areas (Lister et al 2011). It has been argued that the resulting shortages of private rented accommodation will lead to a corresponding rise in demand for LAHOSs (Pawson and Wilcox 2011, pp38-9). Moreover, around half of those who present will have a priority need as defined in the Housing Act (Homeless Link 2010c, p7). These negative portends are borne out in the latest DCLG (2014a, p5) statistical release, which showed that loss of private rented accommodation accounted for over a quarter of all applications (a 14% increase when compared to financial year 2012/13), making it the largest cause of statutory homelessness acceptances in England.

The Coalition has further charged LAHOSs with identifying cost savings and in some cases have reduced frontline staff through redundancy and redeployment (ONS 2011, p2); subsequent reports confirm that public sector employment is experiencing a year on year drop (ONS 2014). In addition to this ‘Supporting People’, which was introduced by the former Labour Government and provided financial assistance to ensure vulnerable households could
remain in their homes, had its ring fenced funding removed in 2010. Thus local authorities were afforded discretion in how they distributed the budget. Even though it was agreed that subsidy would be maintained, it was in fact reduced by 13%, with plans to make further cuts in subsequent years (Homeless Link 2011b, p3). Homeless Link (2011b) concluded that this drop in targeted income toward homeless services was likely to lead to hostel closures and reductions in floating support in an environment where people in housing need were swelling due to welfare cuts. However, despite this challenging environment and as pointed out above, at the time of writing Central Government had not eased pressure to reduce statutory homeless acceptances or the use of temporary accommodation (DCLG 2012b). The next section outlines the LHA cuts in further detail alongside the Localism Act and Big Society agenda, all of which have the potential to impact upon frontline LAHOS delivery.

Coalition reforms
The Coalition Government’s landmark legislative proposal in respect of homelessness and housing is the Localism Act. An overriding theme of the Act is the notion that LAHOSs will have increased discretionary powers to target resources where they view it to be required (Parliament 2011). One area which offers a qualitative shift is the introduction of flexible tenancies, whereby a given authority or housing association may provide a tenancy for a fixed term (Parliament 2011). More specifically relevant to LAHOSs are measures which mean that duty can now be discharged into private rented accommodation whereas accepted homeless households previously held a lawful entitlement to a secure social tenancy. This latter component is nothing new and has in fact been reintroduced after it was repealed by the Labour administration during its time in power (Homelessness Act 2002). Yet this amendment comes at a time when private rented tenures are less viable due to LHA reform in the following areas:

- Amount of LHA payable reduced to a lower average percentile rate of 30 percent in place of the median rent in a given area (DWP 2011)
- An extension of the shared room rate to include those up to the age of 35 (DWP 2011)
- Introduction of a cap, both in terms of property size and the maximum amount that can be paid out to a single household (DWP 2011).

It was highlighted above that reductions to LHA have resulted in private accommodation becoming increasingly unviable due to a decrease in affordability. In addition, survey
findings indicated that around 80% of landlords were unwilling to let properties out to households who claimed LHA in light of recent changes (Apps 2014), meaning that LAHOSs may struggle to access suitable accommodation to discharge duty into. Yet it is maintained that in cases where LAHOSs are able to access private rented tenures, it will weaken the position of statutorily homeless households, potentially placing them in a cycle of insecure accommodation (CIH et al 2012, p15; Fitzpatrick et al 2011, p10). However, due to its discretionary nature local councils have the choice to opt out; for example Camden Council stated that it intended to retain the existing structure of lifetime tenancies (Lloyd 2012). Yet a recent report found the local authorities that have chosen to preserve lifetime tenancies are disproportionately Labour run and correspondingly, Conservative led authorities are proportionally more likely to implement fixed term tenancies (Inside Housing 2013). If these findings are correct this will undoubtedly result in a postcode lottery of sorts, whereby the type of tenancy awarded will depend on where service users wish (or need) to live.

Although not directly related to policy delivery in LAHOSs, the Coalition led ‘Big Society’ programme (Civil Exchange 2012) is worth highlighting. It is difficult to pin the Big Society down to any particular policy area due to the broad and overarching nature of its remit. No coherent synthesis holds it together and rather, it is presented as an overarching theme, a metanarrative (Grube 2010) that undercurrents welfare reform as a whole. Yet the perceived rhetoric underlining its stated intentions may be important in respect of the ways in which LAHOSs justify particular decisions. For example it has been suggested that the Big Society returns debates around the causes of homelessness to the blaming of the individual (Jacobs and Manzi 2013), whereby the state should not be held accountable for the misfortunes of those at threat of losing their home. It has moreover been treated as analogous to welfare cuts (Corbett and Walker 2012) so can be viewed as inextricably linked to current political austerity.

While centrally led political objectives such as the Localism and Housing Acts may essentially shape the work that LAHOSs do, the premise of this thesis is that those very policies may be re-shaped by workers in order to cope with particular pressures in certain circumstances; this is explored in the next chapter.
The political process: perspectives, power and people
The previous sections traced the trajectory of key policy developments, identifying a continuation of the homelessness prevention agenda within an environment of transformation under a new political power. This section begins by summarising the main perspectives that have attempted to elucidate the policy process in order to provide a context for Lipsky’s unique implementation oriented analysis. Perspectives which attempt to illuminate the policy process are normally broken down into two broad schools of thought. The first refers to a rational model and suggests a more longstanding prescient approach (objectives) and the second, an incrementalist outlook, places policy development very much in the here and now (problems) (Booth 1988). The rational/incremental divide is essentially a simplified taxonomy, as procedural frameworks widely differ within each school of thought; additionally, not all policy process perspectives fall neatly into either of these domains (Parsons 1995, pp297-299). It has further been argued that treating both as diametrical opposites is misleading, as each may be utilised to measure contrasting factors or questions. For example, a rational outlook may be applied to assist in an understanding of how policy making ‘ought’ to operate, whereby incremental approaches may be employed to demonstrate the unpredictability that policy makers will actually face when policy is interpreted on the frontline (Booth 1988, pp13-14).

Policy process perspectives
Rational arguments
In the 1970s rational, top-down approaches to policy delivery tended to be dominant, with many commentators holding an inherent assumption that the intention of central directives would filter down and be enacted relatively untouched (Parsons 1995, p462; Lindblom and Woodhouse 1993, p59); if implementation was factored in at all, its vantage point was at the top, or the inception stages (Sabatier 1997, p272). Weber’s particular operationalisation of the bureaucratic state, which identified policy as a top-down, homogenous process is a good illustration of this ordered concept. For Weber it was more or less taken for granted that policy delivery was smoothly delivered by the bureaucratic machinery (Ringer 2004) rather than the multilayed and thorny explanations which have dominated in recent years (see below). A more rationalistic orientated reasoning can be found in structuralist, elitist, Marxist and many globalisation perspectives. Although commentators in these fields hold distinct positions with regard to procedural underpinnings and whose interests are served, each views the process as ordered and predetermined to a large extent. Perhaps unsurprisingly all the
aforementioned positions have been charged with offering a rather deterministic outlook on the ‘modus operandi’ of policy (Hill 2009).

An illustrative example of a rational based argument in relation to housing policy is Somerville’s (1994) analysis of the political landscape leading up to the 1977 Housing (Homeless) Persons Act. He intimated that if local authorities resisted political counsel, the Government would be undaunted. Compliance would be enforced using legislature, thus once a directorate became law local authorities would have little choice but to adhere to it. Somerville (1994) viewed the evolution of housing policy in relation to homelessness as a product of the political ideologies of a given Government, which sustained an omnipotent force on those charged to implement it. Even scholars who have adopted a critical perspective and uncovered political failings when assessing implementation of the Housing Act have at times concluded that resistance can be diminished with the exercise of political will (Cohen et al 2001).

In contrast classic pluralist perspectives argued that power could be exercised within a number of spheres, but suggested these actors worked together in a stable and systematic manner (Dahl 1963). These moved away from a more traditional top down approach, but failed to effectively capture the unordered or chaotic way in which the policy process itself might operate. However, the pluralist philosophy has been rekindled and reshaped into network and policy community models in recent years, commonly referred to as ‘policy network’ approaches (Hill 2009). These ‘networked’ explanations offer varied conceptualisations of the policy process (Jeffares and Skelcher 2011; Silke and Hanspeter 2007), with some attempting to create ambitious models to depict a policy’s vertical and horizontal passage through to the frontline (for example, Sabatier’s (1988) Advocacy Coalition Framework). But an enduring characteristic is that policy advancement is generally measured in terms of multilevel relationships (Silke and Hanspeter 2007).

Incrementalism and multiple relationships
Relatively few earlier commentators identified that the policy process was not necessarily coherent or systematic; this included Lipsky himself, who originally conceived of the SLB in the late 1960’s. Another notable example is Lindblom (1959) who gave regard to the complexity of policy making in his aptly titled ‘The Science of Muddling Through’. Lindblom (1959, p86) held that policy makers generally applied political strategies
incrementally due to an acute awareness that radical amendments to a particular area would be unlikely to have the desired effect at execution. Although Lindblom (Lindblom and Woodhouse 1993) has tweaked his model in response to specific critiques, the essence of incrementalism and disorder remained throughout his writings. It has further been pointed out that at times people may even sway the outcome of policy directives without a conscious recognition that they are doing so (Hill 2009, p4), thus further demonstrating the inadequacy of chiefly assigning policy outcomes to the will of those who have conceived of it.

So while it is important not to lose sight of the fact that higher level policy making coexists with activities which take place at the ‘sharp end’ (Loveland 1991), it is now generally accepted that to view Central Government as the primary determinant of policy outcomes from inception to implementation is fundamentally flawed (Hill 2009; Lindblom and Woodhouse 1993), failing to take into account the multiplicity of actors and interests that may wish to determine particular policy outcomes (Booth 1988). ‘Politics, like life, is a messy business’ (Blunkett 2012, p645), furnished with ‘ambiguities, paradoxes, intractabilities and uncertainties’ (Gregory 2007, p241). However, within this general consensus there exists considerable disagreement as to the relative influence of various policy actors and the nature of incrementalism itself; some of which are touched upon in this chapter.

It is asserted that an incrementalist paradigm is more suitably equipped to assist commentators interested in the policy process at implementation stages, as it recognises the potential for a multitude of influences during interpretation. It highlights that whatever a given policy’s intention, it is rarely played out that way when disseminated due to the ability of institutions and individual actors to dramatically alter its intended shape (Hudson 1989). It is now generally accepted that in respect of social policy effectual research must evaluate the aggregate influences manifest at the frontline (Evans 2010). Further, it has been argued that although implementation may not be the ‘correct’ way to apply political objectives, it nevertheless more closely reflects the reality of the political process (Booth 1988). As Lipsky (2010, pxviii) pointed out, incremental change is the best that can be hoped for in terms of effective policy delivery. It further ties in with the cumulative character of housing policy development since the 1970s, as highlighted at the beginning of this chapter.
The Street Level Bureaucrat

Lipsky (1971) coined the term SLB to refer to public sector workers at the delivery level who were required to exercise discretion when interpreting policy in the course of their day to day role (Lipsky 1980, p4). The use of judgment when forming decisions (or ‘non’ decisions (Lipsky 1984)) was viewed as an essential cog in public service provision, with each case being unique and essentially requiring a person to assess it (Lipsky 1980, p161). The ability to reshape policy intentions, deliberately or otherwise, was viewed as facilitated by the SLB’s recognition of the specialised character of their role and the ambiguous nature of legal directives (Lipsky 1980). As a result of this wide discretion Lipsky maintained that public service employees had a political role insofar as policy was continually reshaped by them at the implementation stages. He further asserted that in a heuristic sense, frontline employees actually created policy due to their relative autonomy in terms of service delivery (Lipsky 1980).

Despite the relatively wide levels of autonomy afforded to frontline officers Lipsky (1971, pp393-395) argued that discretion was often utilised for a negative purpose due to higher level pressures, underpinned by a perennial scarcity of resources. The use of negative discretion was also viewed to be as a result of an inherent contradiction whereby officers recognised that the main purpose of their role was to assist service users, yet insufficient tools were provided in which to do so. For example, many frontline practitioners are required to deal with a heavy workload, lack of sufficient funding, staff or training and are normally required to adhere to strict targets in an environment that is (albeit for the most part ineffectively) scrutinised (Lipsky 1980). In respect of the latter scrutiny was viewed as existing within the bureaucratic environment but was also extended to the media and public who may question how limited budgets are spent (Lipsky 1980, p39, p58).

These pressures in turn cultivated SLB practices, thus leading to rationing behaviours aimed at saving time or financial assets. For instance street level bureaucracies may screen service users or operate gatekeeping practices alongside differentiating clients by the employment of stereotyping, bias or favouritism (Lipsky 1971, pp395-396). While discretion was viewed as being encouraged by supervisory staff if it explicitly achieved organisational, and by extension central goals, Lipsky (1980, p18) argued that SLB’s use of discretion as a coping mechanism to deal with inadequate resources was not supported. He further believed that supervisors were sufficiently motivated to quell the more negative displays of SLB
behaviour. Despite this perceived impulse on the part of managers and the belief that they exerted considerable influence, frontline administrators were nevertheless viewed as relatively unregulated due to the impracticality of senior staff attempting to oversee the role (Lipsky 1980). This was viewed as being primarily due to inadequate time and a lack of detailed knowledge or understanding of the clientele that SLB’s assessed on a daily basis (Lipsky 1980; Prottas 1979).

Although Lipsky (1971) recognised that implementation could be influenced by the beliefs practitioners brought to a role and Prottas (1979) pointed out that individual values inevitably underpinned how specific tasks were undertaken, it was nevertheless believed that professional values tended to converge due to work pressures (Lipsky 1980). This was seen as exerting greater influence than the personal values of staff or the perceived need of service users:

The ability of street-level bureaucrats to treat people as individuals is significantly compromised by the needs of the organization to process work quickly using the resources at its disposal (Lipsky 1980, p44)

Scholarly opinion around the relative influence of personal values in relation to higher level pressures has been found to differ dependent on both the perspective adopted and individual research settings. This divergence is evident when specific examples of implementation orientated studies are provided below and in later chapters.

Lipsky (1980) held that the SLB conceptual framework could potentially be applied to any public service organisation, outlining commonalities such as a statutory function, working within tight budgets, public accountability and political pressures that are likely to exert an influence on service delivery. It is important to recognise that Lipsky (2010, pxvii) did not view all statutory frontline workers as SLB’s and to be defined as such public sector workers were required to satisfy specific criteria. These included direct interaction with service users, an ability to exercise discretion and the existence of limitations in work structure. In turn a given public sector’s position as a street level bureaucracy may change over time and space,

Footnote:
3 It has been pointed out that the conceptualisation of ‘professional’ was fluid in Lipsky’s work, in the sense that both a wider and narrower focus was utilised interchangeably (Evans 2010, pp19-21). For the purposes of this thesis a professional broadly refers to all public and third sector employees and managers who have the ability to apply a level of discretion to the role.
dependent on, at least in part, satisfying the three conditions highlighted above (Lipsky 2010).

Of particular interest to the aims of this project, as touched upon above, is Lipsky’s (1980, p193) contention that as a result of their relative autonomy SLB’s will not necessarily distribute available resources evenly. That is, in order to simplify a contradictory, ambiguous and resource pressured role (Lipsky 1971), some service users will be subject to less favourable treatment (Lipsky 1980, pxi) which could potentially cause harm (Lipsky 1980, p84). Further, it was suggested that users of stigmatised services would be especially prone to the withholding of potentially helpful information (Lipsky 1980). Moreover, it was maintained that many service users would unquestionably tolerate this state of affairs due to a limited comprehension of how policy directs the system to work (Lipsky 1980, p53) (although, as will be shown below when the exercise of power is considered, there are other reasons for this). When Lipsky (1980) referred to service users, he generally viewed them in a pejorative light, arguing that practitioners, as a condition of their work, were required to dehumanise the individual. The service user becomes a quantified, processed, and ultimately, socially constructed client who could be fitted into the ideology of the bureaucracy (Prottas 1979). Whilst the sense of ‘inevitability’ in terms of how service users will experience frontline public services is evident in Lipsky’s work, he did recognise that a few may actively attempt to influence the process to increase the likelihood of a favourable outcome. Yet with this acknowledgement was attached a caveat that for the most part this would prove unsuccessful due to limited resources (Lipsky 1980, pp 9-10).

Figure 2.1 breaks down Lipsky’s SLB framework into a few main themes and a larger number of corresponding concepts. All bar one of the main variables, ‘alienation’, are covered due to their relevance to the main research questions. Although the concept of ‘alienation’ can facilitate comprehension of a practitioner’s separation or detachment from the role, it is not as helpful in uncovering dynamics of service provision in respect of older people and is thus not included in any discussions. In reality the individual concepts are for the most part interconnected, and Figure 2.1 has been produced for illustrative purposes only.
Although most of the individual concepts in Figure 2.1 were outlined earlier and are returned to below, each is covered in greater detail in Chapters Six and Seven when the interviews are analysed. Before looking at investigations which have applied the SLB conceptual framework to specific research settings the important question of how the distribution of power directs the policy process is now considered.

**Policy implementation and power**

It is argued that investigations concerned with the policy process must be mindful of its congruence to debates around the distribution and exercise of power (Hill 2009, p25). The identification of ‘who’, ‘where’ and ‘how’ power is distributed depends to a large extent on the theoretical underpinnings of a given scholar. For example those writing from a pluralist position view it as being present at all levels, albeit not necessarily evenly spread (Dahl 1963), whereas Marxist and elite theorists maintain that power is concentrated in the hands of a few (Hill 2009). A further obstacle to comprehending the operation of power is that it tends to be covert and thus difficult to measure, which is perhaps the reason why many scholars who study the policy process utilise a qualitative case study method, in an attempt to uncover these processes at source (Hill 2009, p10). As this thesis adopts Lipsky’s SLB conceptual model, the remainder of this section will concentrate on the exercise of power at the
implementation level. The SLB framework is often situated in the bottom up school of thought due to its focus on micro level policy delivery (Hill 2009, p17), yet it has been countered that to treat it is unidirectional is mistaken as top down elements are also present in the sense that the negative application of discretion is generally attributed to central political objectives (Evans 2011, pp369-370).

Some implementation scholars have viewed frontline public sector staff as holding considerable power. For example Meyers et al (1998) asserted that practitioners should not be viewed as mere statutory servants who unquestioningly implemented central policy, but rather, as having an interdependent relationship with Government in the sense that they are relied upon to carry out policy directives. Yet while Lipsky (1980) recognised a practitioner’s ability to exercise discretion relatively independently, this was viewed as being generally geared toward higher level concerns, as highlighted above. So despite Lipsky’s acknowledgement that officers had the opportunity to manipulate policy outcomes the employment of discretion was linked to wider pressures which indicate that it does not constitute an exercise of power as such. Consequently it has been suggested that many frontline professionals can exert power over service users, but not over the overriding purposes of their role (Hill 2009, p262) (this is returned to below when debates around the nature of discretion on the frontline are considered).

**Service users**

As touched upon earlier, while Lipsky contended that in some cases service users may be able to orchestrate favourable outcomes, he maintained that the balance of power ultimately rested with public sector decision makers (and by extension, the priorities of the organisation for which a service is sought). Although commentators who have applied the SLB framework have presented differing perspectives around those who hold power and the relative value of frontline discretion, most concede that service users have a limited ability to influence outcomes (Sullivan 2009; Ellis 2007; Pawson 2007; Hudson 1989) with their fate being determined by how SLB’s (and by extension their peers and organisation) perceived them (Maynard-Moody and Musheno 2003, 2000).

A further barrier relates to the suggestion that the exercise of power is only realistic if tackled as a collective concern (Lindblom and Woodhouse 1993). This indicates that statutory review and appeal procedures will make the seeking of legal recourse more problematic due to its
reliance upon individual action (Lipsky 1980). In specific reference to LAHOSs and giving regard to Lindblom and Woodhouse’s assertion, it is argued that LAHOS users occupy a weak position as they tend to come from divergent backgrounds and are thus isolated from each other (Cheeseman 2011). Another important point is that public service users do not generally have the choice to go elsewhere if they are dissatisfied (Lipsky 1980, p50) and as far as many are concerned, public sector workers are synonymous with the government (Lipsky 1971, p392). In other words whilst SLB’s may be viewed as having limited power at higher levels, the power held by frontline officers will generally be perceived as significant to service users, whereby specific decisions can have a potentially life changing impact.

The arguments presented so far in this chapter present a rather bleak picture for households who rely on public services. Marvasti (2002) warned against viewing public sector processes as necessarily predetermined or unidirectional, adopting an ethnographic approach in an attempt to demonstrate that the service delivery environment should be viewed as a dynamic and changing process. Yet his findings nevertheless support arguments that the balance of power ultimately lies with frontline officers who primarily steered outcomes toward the rules and policies of a given organisation. It is therefore iterated that service users for the most part occupy a weak position when they seek services due to higher level concerns that they have limited power to influence. Giving regard to the main arguments discussed here, this thesis broadly follows Hill’s (2009, p107) contention that although the influence of specific policies, from inception to dissemination, will essentially differ dependent on the actors involved and their ability to influence outcomes, power is essentially unequally distributed. The identification of power, who has it and why they use it, underlines much of the discussion in the following chapters.

Lipsky in a contemporary public service climate
The next few sections explore how Lipsky’s SLB conceptual framework has been applied to assist in an understanding of the recursive relationship between policy intentions and its interpretation and dissemination at the frontline. Lipsky conceived his framework over 40 years ago and Northern American public services were the focus of enquiry. Many contemporary explorations have sought to test if the framework is compatible to political environments outside of America and in the wake of new ideologies and management structures.
For the most part later researchers have concluded that street level bureaucracies have continued to a greater or lesser extent, due in large part to the prevailing gaps between intended policy outcomes and the financial means to achieve them, leading to a ‘mismatch between rhetoric and resources’ (Evans 2010, p36). In short, the main factors which Lipsky viewed as indicative of an environment in which SLB’s would thrive have been uncovered in later years. These include financial scarcity, lack of clarity around the intended purpose of legislation (Evans 2010, p37; Lindblom and Woodhouse 1993), pressures due to heavy case loads (Sullivan 2009; Evans 2010), conflicting and ambiguous directives (Chun and Rainey 2005) and the presence of external scrutiny (Rashleigh 2005). Hence frontline workers were found to apply discretionary powers where they viewed it as necessary to deal with these issues (Sullivan 2009; Ellis 2007; Maynard Moody and Musheno 2003), which in turn resulted in unequal outcomes for particular service users (Sullivan 2009; Ellis 2007).

The SLB and older people

As emphasised in the introduction, an SLB framework has not been applied to assess the quality of LAHOSs for older people, though a few make reference to this group in respect of social service departments in the UK. For example Sullivan’s (2009, p1314) study of two social work departments in England utilised Lipsky’s SLB alongside Goffman’s frame analysis to argue that the ideological underpinnings of frontline workers worked alongside organisational level concerns as a significant contributor to how older people were viewed, and policy subsequently implemented. It was found that due to the need to limit services decision making for the most part was based on value judgements and stereotypical frames of reference. Moreover, in parallel to Lipsky’s main findings (and those of Maynard-Moody and Musheno) a few older service users were assessed as more worthy of provision and thus bestowed with favourable treatment. This led to a situation whereby some older service users with the highest levels of need, such as dementia sufferers, received lower levels of provision (Sullivan 2009, p1314). Yet in line with the discussion above around the relative lack of power held by service users the older people in this study rarely challenged what the researcher perceived to be untoward behaviour (Sullivan 2009, p1316). Ellis (2007) similarly determined that social workers adopted pathological frames of reference in respect of older service users when assessing their suitability to receive direct payments for care services. One illustration of this was that younger people tended to be viewed as more suitable for

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4 UK legislation on direct payments involves an attempt to replace state organised care services with payments of cash to the recipient who is then required to pay directly for their personal care and was set up by the Community Care (Direct Payments) Act (1996).
direct care payments whereby older people, in contrast, were regarded as more dependent and reticent to change.

Both these investigations highlighted that judgements regarding older people (alongside those based on individual characteristics, such as ethnicity or social class (Evans 2010, p145)) was attributable to organisation level concerns relating to budgets interspersed with assumptions held regarding older people. Although the latter relies on a more subjective assessment, particular attitudes may nevertheless have developed through experience within the organisation and/or were perhaps informed by wider assumptions around the abilities of the oldest old (as highlighted in Chapter One). This is reminiscent of Lipsky’s (1971, p394) argument that SLB’s would attempt to make sense of the ambiguity and contradictions which surrounded the role by looking to peers, managers and even wider definitions to support particular actions. It further highlights the difficulty in attempting to attribute the use of stereotypes such as ageism to individual decision makers. The use of stereotypical frames of reference in respect of older people was explored further in the fieldwork and is discussed in Chapter’s Six, Seven, Eight and the Conclusion.

Abatement arguments
A few scholars (mainly in the field of social work) have held that the validity of a SLB framework to explain frontline public service provision has diminished in recent years. The chief argument put forward to support this is that the development of New Public Management (NPM) type operating procedures in the 1990s had achieved its primary objective of enhancing accountability and curbing discretionary elements of service delivery (Lane 2000, p3). Referring to social workers Howe (1991) argued that managerialist developments had dramatically curbed the level of discretion that could plausibly be exercised by frontline practitioners and further, that initial training successfully socialised staff to operate within limited, organisational led, parameters. Taylor and Kelly (2006) concurred that the panoply of administrative objectives relating to tighter control and rigid rules meant that an officer’s ability to re-shape policy or influence the outcome of procedural directives had been curtailed in any public service organisation in which parallel restructures had occurred.

However, NPM, both its conceptualisation and perceived relevance are widely debated (De Vries and Nemec 2013) with research highlighting that its application is multifaceted and
dependent on the values of individual actors (Jeffares and Skelcher 2011) who may not necessarily adhere to the intended application of its methods (Evans 2011, pp381-382; Gregory 2007). It has also been pointed out that due to the complexity of particular environments the NPM model is ineffective in addressing frontline delivery of the kind conceptualised by Lipsky and is better suited to explaining less fluid policy areas, such as health and safety (Klijn and Koppenjan 2012, p587). Alongside this are arguments that the NPM has been superseded in any case (Klijn and Koppenjan’s 2012). The current Coalition Government’s stated desire to reduce public sector scrutiny must also be considered (see below).

But rather than become embroiled in debates around how modern developments in the public sector should be conceptualised it is argued that the main causations provided as to why abatement has occurred are reminiscent of the pressures Lipsky (1971) outlined back in the late 1960s when he conceived of the SLB. That is, officers were viewed as generally exercising punitive control over the pace, raw materials, or outcomes of their role (Lipsky 1980). Yet far from this limiting SLB practices these barriers to independent decision making in fact potentially increased it. For example, in his participant observation research in Boston Lipsky (1984) found that increased scrutiny had a negative impact on service delivery as primacy was given to meeting set criteria. Subsequently, less time and resources were devoted to ensuring service users received a fair service. Moreover, Lipsky (2010) attested to the aforementioned bureaucratic changes in management structures in a recently updated version of his 1980 SLB publication, but maintained that these later attempts to suppress disproportionate frontline discretion had for the most part failed.

A further issue is that Howe’s (1991) assertion that a social worker’s knowledge is predetermined by the training management choose to provide ignores the informal knowledge transfer of working practices and coping skills shared by employees (Parsons 1995). Moreover, though Taylor and Kelly (2006) acknowledged that practitioners are still required to exercise discretion on a day to day basis, they assumed that this was now more closely monitored by management, who in turn ensured rules were adhered to in a target driven, scrutinised environment. Yet it has been pointed out that even if supervisors are suitably motivated to monitor the work of practitioners (considered below) it would be impracticable to do so due to the sheer number of service users dealt with on a day to day basis (Prottas 1979); thus ‘if everything is scrutinized nothing is scrutinized’ (Lipsky 1980, p164). In this
vein Smith et al (2011, p997) suggested that policy makers could suppress SLB type behaviours in the short term in a few selected areas, but to do so nationally and over a longer term was unworkable.

It has ultimately been argued that enhanced scrutiny may have stemmed the flagrant abuse of policy, but it nevertheless failed to impact upon the undercurrent of discretion which forms a part of work practices that exist on a routine basis (Hudson 1989, p49). It has moreover been pointed out that suppressing discretion was not the aim of the managerialist programme in any case. As touched upon above, policy makers generally concede that they cannot take into account all eventualities when formulating policy and thus recognise that the specifics will be determined by public sector workers (Andrews et al 2012, p77), who are recognised and relied upon by central policy makers (Crotty-Nicholson and Miller 2011) and supervisors (Evans 2011, p372) alike (though as has discussed previously, it must be borne in mind that higher level pressures are embedded within frontline policy interpretation). It has additionally been demonstrated that even if employers witness policy contravention on the frontline they may turn a blind eye if it resulted in meeting set objectives (Evans 2010; Evans and Harris 2004, p873). The argument that managers may tacitly approve SLB practices in many respects runs counter to Lipsky and is considered further below.

Fundamentally the complexity and multiplicity of public service delivery is not afforded sufficient regard by abatement scholars. It could further be said to underplay the fact that discretion is an essential element of assessing individual needs which, it has been argued, would amount to contravention of policy if workers did ‘not’ exercise it (Evans and Harris 2004, p888):

Street level bureaucrats have discretion because the nature of service provision calls for human judgement that cannot be programmed and for which machinery cannot substitute (Lipsky 1980, p161)

So while there is no denying that rules and regulations permeate public services, as Lipsky himself recognised, it does not necessarily mean that SLB’s follow them; ‘street level work is, ironically, rule saturated, but not rule bound’ (Maynard-Moody and Musheno 2003, p10).

A further point is that the present Government has expressed a desire to reverse the development of central scrutiny in local authorities in any case, to allow greater operational
autonomy (HM Government 2010). For instance while targets related to prevention, statutory homelessness, and use of B&B are still operational in LAHOSs, the regulatory body that oversees this, the Audit Commission is due to be disbanded, with an intention to replace it with alternative local auditing bodies (DCLG 2012a). Yet, when gatekeeping practices in LAHOSs are discussed in the next chapter, the effectiveness of external organisations in suppressing SLB type behaviours are questioned anyhow. While it could be argued that schemes such as the Gold Standard initiative show that scrutiny of services continue to prevail, it is restated that this is discretionary and as seen above, has for the most part not been adopted by LAHOSs. This is not to suggest central pressures are diminishing, but rather, the means of achieving reduced statutory acceptances, for example, are less prescribed. Although this is a positive outcome in some respects it does increase the opportunity to apply illegitimate discretion (this is considered in the next chapter). In summary, the conditions which Lipsky identified as necessary for the existence of street level bureaucracies has arguably not waned following the framework’s original conception over 40 years ago.

**Reconceptualisation of the Street Level Bureaucrat framework**

The previous section offered a critique of commentators who have argued that the SLB framework is no longer valid, pointing out that this view is not shared by the majority of researchers in this area. What tends to be more customary is that SLB scholars concur with its dominant principles, but modify particular elements to reflect the context of individual research findings. The next three sections consider a few central critiques in some detail, focusing on debates around the conceptualisation of a SLB, organisational dynamics and the main drivers of discretionary behaviours. Another important debate relates to Lipsky’s argument that public sector workers can be viewed as politicised; however, as this was considered above when the nature of power in frontline organisations were explored, it is not covered here.

**Who are the street Level Bureaucrats?**

One observation of the SLB framework is that it fails to sufficiently capture the heterogeneity of those employed in street level bureaucracies. For example Yates (1982) argued that Lipsky at times applied equivalent stereotypes or assumptions in respect of the actions of frontline workers as he accused them of adopting with service users. Lipsky was also accused of paying scant regard to organisational level dynamics that may form due to the personal characteristics of SLB’s in relation to their supervisors or service users (see below). For
instance Grissom and Keiser (2011) found that the ethnicity of frontline workers may impact upon the conditions of their role if it differed to that of their line manager. Similarly Maynard Moody and Musheno (2003) discovered that professional rank (i.e. status of supervisor) had less impact on organisational relationships than personal traits relating to age, sexuality or gender. These findings suggest that peer or supervisory relationships (which can be important when decisions are formed) may also be dependent on a number of personal factors, which indicates a wider set of dynamics than that presented by Lipsky.

On the other side of the coin research has pointed to differential outcomes based on the characteristics of service users themselves, such as ethnicity (Sullivan 2009; Lipsky 1971), social class and age (Sullivan 2009). Whilst Lipsky (1984, 1980, 1971) devoted more attention to the characteristics of service users he concentrated less on the how this may interact with those of the public sector workers who served them. Yet it has been found that the specific characteristics of frontline staff in relation to service users can impact upon service outcomes. For example research on the effectiveness of ‘representative bureaucracy’ in respect of the ethnic makeup of frontline staff has shown that in some cases particular minority groups received a greater share of resources if the organisation for which they sought services contained workers of a similar demographic composition (Meier and Stewart 1992; Selden 1997).

However, while research which explores how characteristics held by employees may impact upon professional relationships and resource allocation is helpful, it must be borne in mind that Lipsky acknowledged this omission at the outset. It was accepted that the particular nuances of individual decision makers could not be accounted for due to the large population under study. He therefore maintained that the conceptualisation of the SLB framework reflected ‘central tendencies’ (Lipsky 1980, pxvi). So although it is viewed as important to recognise that personal characteristics may impact upon the dynamics which exist in public sector settings, it is argued that to sufficiently capture all individual factors into a predictive framework at the micro level would prove incredibly complex and is thus not attempted. In fact, the aforementioned research focusing on representative bureaucracy tends to adopt broader, macro level instruments to measure its efficacy. Rather, the aim is to understand the broader determinants of specific types of discretionary behaviour in LAHOSs (this is returned to in Chapter 4).
Moving away from personal characteristics and toward relationships based on job role, recent research in UK public service settings suggest that Lipsky may have oversimplified the frontline dynamics that exist between staff and their line managers (alongside those highlighted above relating to individual characteristics). For example it has been shown that senior staff at times experience conflicting goals themselves and may be torn between upper and lower level concerns (Hoyle 2014; Evans 2011, pp381-382). For instance Evans (2010, p371) contended that Lipsky paid insufficient regard to the fact that managers may exhibit SLB behaviours where they assessed it as necessary. He went on to argue that managers should not be viewed as mere ‘policy lieutenants’ (Evans 2011, p372) but as agents who will look to manipulate legislation to achieve their goals (Evans 2011, pp370-371). It was moreover pointed out that differences between higher and lower level management may be greater than between direct supervisors and frontline staff, which is something Lipsky failed to portray due to his homogenisation of public sector management (Evans 2011, p383). Evans is one of the few researchers to investigate SLB’s at the senior staff level and thus provides an extra dimension to studies which at times assume officers and managerial staff will necessarily experience the complexities and challenges of the role differently (though this is not always the case, for example see Murray 2006).

Turning to a broader issue a few commentators have attempted to reconceptualise the term SLB due to findings that it did not adequately reflect particular public sector settings. For instance Durose (2009) substituted SLB for the terms ‘civic entrepreneur’ in an attempt to move away from the strong state orientated focus evident in Lipsky’s SLB. Maynard-Moody and Musheno suggested that frontline workers share a dual narrative, relating to state and citizen agent, whereby the latter tended to be the language adopted by frontline workers (both are considered further below when potential drivers of discretionary behaviour is considered). Bovens and Zouridis (2002) attempted to re-work Lipsky’s SLB to fit in with what they believed was a changing landscape within some traditional street level services. Although they contended that discretion in policy implementation persisted, they argued that it had changed in nature as computers had progressively routinised decision making tasks. It was suggested that as frontline workers were now more likely to interact with service users virtually the term ‘systems level bureaucrat’ may be a more fitting description. Although Bovens and Zouridis (2002) accepted that a ‘system level bureaucrat’ would not be applicable to all public organisations, they nevertheless arguably strayed from Lipsky’s original conception. As highlighted above the very essence of a SLB in Lipsky’s framework
referred to those who had face to face dealings with the public and was not designed to understand officers in statutory roles who dealt with ‘paper, not people’ (Prottas 1979, p103). Furthermore and as will be shown later, direct contact with service users remains an essential element of the LAHOS role in any case (as with social service departments, where employment of the SLB model has been heavily concentrated in the UK).

**Individual values versus organisational constraint**

Alongside critiques which highlight the lack of dimension afforded by Lipsky to individual frontline SLB’s, his suggestion that decision making behaviour was inextricably linked to the organisation for which officers worked has also been viewed as an oversimplification. It has been argued that decision making cannot merely be explained by organisational pressures as individual actions will inevitably impinge on the process (Keiser 2010). For example though Lipsky (1971, pxii) accepted that practitioners may possess a desire to assist service users on commencement of the role, he maintained that infiltration within the bureaucracy would erode this over time.

Yet it could be argued that Lipsky underestimated the influence of individual agency and that extrapolating where individual values can be separated from or merged into that of the organisation for which they are employed is problematic. Simon (1957) believed that an individual officer’s values were intertwined with, rather than subsumed by the organisation and thus viewed that individual and organisational values were inseparable as an explanation of administrative implementation. Alongside this Lindblom (1959, p82) maintained that values themselves were fluid and context dependent. However, the focus on individual level discretion will ultimately be influenced by the perspective followed by a given scholar. For instance Garrow and Grusky’s (2012) institutional level focus viewed discretionary behaviour as being synonymous to the needs and values of the organisation, leaving less room for individual interpretation of specific actions. It is moreover important to give regard to findings that peer influence can be highly influential in shaping the decisions of frontline officers (Tummers et al 2012; Hupe and Hill 2007) potentially exerting a greater influence than that of a supervisor (Maynard-Moody and Musheno 2000, p342).

These studies draw attention to the complex nature of assessing broad patterns of behaviour within a micro level environment and this topic is returned to in the next chapter when policy implementation in LAHOSs is discussed. But suffice to say here that due to the interplay
between individual decision making and higher level or peer pressures that work alongside this, it is assessed as unfeasible to go further than speculate as to why decisions may differ on a more personal level, or why some decision makers are perceived as tougher than others (discussed in Chapter Three). In summary, separating individual actions from the influence of higher level concerns when policy decisions are made does not form a discernable role in Lipsky’s SLB analysis. As the means of assessing why interpretation may differ at an individual level is complex and difficult to predict, studies which have attempted this generally isolate singular characteristics, such as gender (as highlighted in Chapter One).

The nature of discretionary practice
Another area of Lipsky’s (1980) analysis that has been debated is his focus on the more negative exercise of discretion, whereby unequal outcomes are viewed as almost embedded in its structure (Foster 1983). Lipsky further assessed more illegitimate use of discretionary practices as being entrenched in organisational concerns (as highlighted above) rather than the need of service users. This rather bleak outlook has been shared by a number of researchers’, particularly where investigations have focused on social services. For example Foster (1983, pp201-211) argued that the prominent role played by the need to ration services undermined the professionalism of social workers. Heywood et al (2002) questioned whether the action of frontline staff should even be viewed as discretionary following findings that policy outcomes were manipulated as a primary consequence of vertical dictation. They further suggested that although employees may feel that specific practices go against their instincts, primacy is given to retaining their employment (Heywood et al 2002, p54). This links in with Lindblom and Woodhouse’s (1993, p71) assertion that bureaucrats (used in a wider sense) tend to focus on restraints rather than the actual aims of policy directives and from this viewpoint the act of deliberately contravening policy to meet targets or keep costs low becomes perhaps more understandable.

The arguments above (and those discussed at the beginning of this section) tend to imply that practitioners operate under the hegemonic control of the bureaucratic machine and, at least at the macro level, the use of the term professional discretion is perhaps an overstatement of their implementation behaviour.Linked to this Maynard-Moody and Musheno (2000, p341) disagreed with Lipsky’s (1980) assertion that SLB’s have a role to play in policy making. They argued that SLB’s have the potential to ‘shape’ but not ‘create’ policy, arguing that
their decisions are too localised and disparate to form a recognisable policy as such (this argument is explored further in Chapter Eight).

As highlighted above when the relative power of public sector workers was debated, a few scholars have attempted to move away from a more pessimistic focus, maintaining that the application of discretion reflects the professionalism afforded to frontline officers (Andrews et al 2012; Evans 2011). Other commentators have countered that far from being necessarily hegemonic in nature, the exercise of judgment can potentially augment fulfilment of a role (Nielson 2006). Durose (2011) maintained that although Lipsky’s depiction of discretion remained in frontline delivery, practitioners, at least in her study, were no longer unilaterally controlled by bureaucratic concerns, as more decentralised elements of service provision had changed the nature of how it was utilised. It was thus argued that the term SLB could not satisfactorily account for a more contemporary, localised focus on the public sector role and was thus substituted with ‘civic entrepreneur’. This was intended to reflect frontline workers who juggled central directives and worked toward making these fit with local needs, rather than merely ensuring organisational goals were achieved (Durose 2011). Along similar lines Maynard-Moody and Musheno (2000) argued that SLB’s would be better operationalised as ‘citizen agents’ as opposed to ‘state agents’ in an attempt to draw attention to the fact that official objectives were viewed by officers as secondary to assisting service users. The tone of these assertions are reminiscent of a Government document which provides assurances that discretion (at least in social service departments) would be given back to frontline workers so they would be better placed to help citizens:

Giving decision making to front-line professionals is important in building localised and flexible services. The workforce will be empowered to work more in partnership with carers and volunteers locally, helping to develop community skills [research findings have shown that] burdensome procedures and over-regulation reduce social workers’ discretion to exercise professional judgement (DoH 2010, p35)

Nevertheless, the literature as a whole suggested a more pessimistic picture of service provision than those portrayed above. Furthermore, Maynard-Moody and Musheno (2000, p340) themselves contended that that the role of ‘citizen agent’ tended to be reserved for the minority of service users assessed as more ‘responsive’ or ‘receptive’ to services.

It further needs to be borne in mind that the exercise of discretion is itself complex (Evans 2010), many-sided (Taylor and Kelly 2006) and may be practiced to a greater or lesser extent.
With respect to the latter levels of discretion may be determined at the organisational (Kelly 1994), or individual level (Lipsky 1980). Correspondingly, the research settings discussed have presented a large and very complex matrix of why, how and when officers exercise discretion. Add to this the fact that the causations and drivers of implementation of specified policies will inevitably differ across varying countries, political systems (Meyers and Vorsanger 2003, p252) and with individual types of organisation (Evans 2011). Thus effective evaluation of the determinants of discretion becomes tricky to unravel. It is therefore accepted that SLB behaviours may ensue to a greater or lesser extent, commensurable on each situation and its context (Evans and Harris 2004). By appreciating this apparently infinite combination of micro, meso and macro level contexts and objectives it is easier to see why scholarly portrayals of the SLB worker shift from the self interested, altruistic, powerful or powerless. However, that said, nearly all commentators who applied the framework were able to utilise the main principles successfully in their particular fields of study.

**Conclusion**

Policy development has seen a steady ascent in both the nature and type of assistance a household at threat of homelessness should expect to receive. Furthermore, political change enacted from the turn of this century has transformed LAHOSs into more dynamic, preventative led organisations; yet perennial scarcity and associated pressures on accommodation remain. Moreover, pressure to reduce statutory homelessness and temporary accommodation use looks set to continue unabated as the current administration heads toward the end of its first term in Government. Due to space considerations it has not been possible to cover the wide array of differing viewpoints regarding the extent to which SLB persists, or how implementation theory can be applied to measure discretionary practices in frontline public services. Suffice to say that no two scholars have presented the same argument, which was expected due to the primarily micro level research focus and the nature of policy delivery itself which is essentially complex, with numerous potential forces driving particular behaviours (albeit with some having great influence than others).

The evidence assessed nevertheless indicates that an implementation perspective should be an integral component of any assessment relating to policy delivery. It has been shown that to study senior levels of a hierarchy is not sufficient to comprehend the dynamics of the implementation process (Hudson 1989, p42), ‘if we wish to understand policy
implementation, we must understand the SLB’ (Hudson 1989, p53). Based on Lipsky and related findings policy execution is assessed as an important phase which may ultimately determine the quality of advice and assistance given to older users of LAHOSs. It is therefore imperative to appraise the ways in which policy contravention can occur, as in order to tackle these practices effectively an appreciation of how and why they operate is required (Nielson 2006, p866). Although Lipsky’s findings and critique have been introduced here the specific concepts are returned to in later chapters when the fieldwork findings are discussed. The next chapter will consider research into frontline implementation in LAHOSs and evaluate current service provision for older people at threat of homelessness.
CHAPTER THREE

Delivery of Housing Option Services, Homelessness and Older People

Introduction
This chapter begins by focusing on investigations which have assessed policy delivery mechanisms in LAHOSs. Although no other analysis has explicitly applied Lipsky’s SLB to LAHOSs in England some researchers, particularly those writing from a socio-legal perspective, have acknowledged its applicability to specific areas of frontline implementation. Furthermore, studies which have explored the prevalence of gatekeeping have reported causations synonymous with the framework, such as attributing its practice to pressures around resource scarcity (see below). The role of the TSO’s who can assist service users who wish to challenge LAHOSs is then discussed, alongside evidence which shows that these are under threat due to funding cuts. The second part of the chapter concentrates on older people affected by homelessness, assessing its potential prevalence and causations before considering statutory provision in this area. The investigations discussed demonstrate that the position of older homeless people is qualitatively distinct and commonly disadvantaged when compared to other groups. Regrettably, only limited research relating to older people at threat of homelessness was found, although some explored this retrospectively with literally homeless cohorts.

Policy implementation in Local Authority Housing Option Services
Chapter Two highlighted the multifaceted nature of frontline delivery settings, whereby complex interactions take place and mutual influences occur in both horizontal and vertical directions. The following sections consider research which has applied an implementation lens to LAHOSs, opening with studies around the processes by which housing policy and caselaw is interpreted on the frontline. This is followed by a detailed look at investigations which have found deliberate misappropriation of housing law.
Interpretation of the Housing Act

The first two chapters demonstrated that the way in which housing policy is interpreted on the frontline is more complex than assessing an employee’s awareness of its written content. That is, it is generally accepted by implementation scholars that the ‘law in books’ will inevitably be re-shaped by the ‘law in action’ (Cowan et al 2006, p383). The latter, which mainly consists of unwritten rules, are generally favoured and it has been argued that policy amendment is unlikely to be sufficient to alter this tacit organisational structure (Seal 2007). Along similar lines Maynard-Moody and Musheno (2003) stated that the cultural context of the public service worker role operated synonymously to that of the legal environment, emphasising that the former often took precedence over the latter. Findings which show that LAHOS practitioners base assessments less on legislative rules and more on contextual considerations and networks relevant to their local environment lends support to these assertions (Hunter et al 2012; Pannell and Palmer 2004, p20; Burrows 1997, pp55-56; Loveland 1991, p20). For example in respect of influences at the organisational level the interpretation of legislation has been shown to be regionally diverse due to a combination of localised codes of guidance which are utilised to a greater or lesser extent than central legal directives (Bramley 1993). In a similar vein when uncovering evidence of gatekeeping behaviours, Evans (1999, p148) found that access to a homeless application was just as likely to be guided by the specific practices of LAHOSs than housing legislation itself.

On an individual level, it has been argued that practitioners view policy as an exogenous constraining factor which impacts upon their ability to operate the role effectively (Loveland 1991, p22). Furthermore, Loveland (1991, p13) provided direct examples of how individual values may override higher level instructions, describing a LAHOS practitioner who bestowed favourable treatment on victims of domestic violence by taking a homeless application. This was despite the authority where she was employed discouraging this, preferring to enforce service users to access other avenues such as an injunction. Although in some LAHOSs it may not be possible for officers to make statutory decisions which go against organisational directives, as will be considered here and in later chapters, it does demonstrate that individual actions have the potential to impact upon the delivery process. Yet it has nevertheless been shown that officers tend to justify a specific reading of housing policy by referring to measureable or desirable outcomes that are generally determined at a higher level. For instance when gatekeeping practices are considered below it is shown that
the main causation of its application is linked to the political drive to reduce statutory homelessness and use of temporary accommodation.

Corresponding to Lipsky’s argument, research into homelessness services found that subjective assessments could lead to the adoption of stereotypes, bias and favouritism toward specific service users. For example commentators linked divergent decision making to characteristics such as gender (Cramer 2005) and ethnicity (Halliday 2000). Further, it was found that presenting with more fluid or transient circumstances, for instance domestic violence (Rashleigh 2005), leaving the parental home (Niner 1989) or certain health concerns (Bretherton et al 2013) could negatively impact upon the process. Bretherton et al (2013) considered how frontline practitioners assessed medical need and found evidence of discordant decision making patterns due to the use of highly subjective thought processes. For example if someone presented particularly well, they may not be convinced of claims that the applicant had specific health problems. It was further found that those perceived to have more ‘visible’ health issues, such as use of a stick, may be viewed more favourably. This latter example is supported by Lipsky’s (1971) earlier argument that SLB’s will use outward appearance to form assessments. On the flip side this suggested that households who presented with mental ill health would be more likely to fall victim to gatekeeping practices (Bretherton et al 2013, see below). Moreover, it was found that frontline workers did not give due weight to formal medical opinion from the applicants own GP owing to a distrust of the intentions of the latter.

The researchers concluded that frontline workers exhibit SLB type behaviours when assessing whether the medical condition of a single applicant is sufficient to gain them priority need status and thus the broad intention of law relating to vulnerability on the basis of health was broken (Hunter et al 2012). Although the authors did not explicitly anchor this to organisational level pressures within LAHOSs, they did link it to wider influences insomuch as the environment in which assessments were made was viewed as socially constructed (Bretherton et al 2013). Furthermore, many of the investigations referred to above placed causations of discriminatory behaviour based on specific circumstances within inherent meso or macro led pressures, such as resource shortages and related workload and target driven pressures. These findings are now turned to in the context of studies which found evidence of gatekeeping in LAHOSs (the practice of gatekeeping in relation to older people is dealt with later in the chapter).
Evidence of gatekeeping

Lipsky (1980) listed a number of tactics that officers may utilise to discourage take up of services, including: monetary (ensuring the service user incurs a charge), time, creaming (assisting those who appear to have fewer problems or issues), queuing, psychological (lack of respect, degradation, bias) and information (failing to distribute or withholding). Whilst gatekeeping may potentially interact with each, it specifically refers to a type of information rationing. That is, the failure to advise service users of their right to request a homeless application, or suggesting (incorrectly) that they are ineligible to apply. It is further concerned with a service user’s ability to access their procedural rights to make a homeless application. This follows Adler and Asquith’s (1981, p. 128, cited in Foster, 1983) distinction between procedural rights, that of ensuring that the process involved when claiming a service is dealt with according to legal rules, as opposed to substantive rights, which refers to a service outcome.

As stated in Chapter One, in legal terms if a household is assessed as threatened with homelessness within 28 days they have the right to request and be granted a homeless application regardless of perceived priority. It has been argued that prior to the prevention agenda households presenting as homeless were normally taken on face value and automatically completed a legal presentation, but its introduction meant that service users were required to undergo a filtering process (Pawson and Davidson 2007). It thus became progressively problematic to communicate with a practitioner qualified to conduct a legal homeless presentation, with more staff being employed on the frontline to prevent service users reaching this level (Reeve and Batty 2011; Rashleigh 2005).

However, as touched upon in the previous chapter, the role of gatekeeping in frontline provision prior to the prevention agenda should not be underplayed. For example Evans (1999) found that staff routinely discouraged applications from single people, many stating that this was to limit workload and reduce expectations of non priority applicants. Niner (1989) showed how specific tactics, such as requesting substantial amounts of evidence to support claims, or advising an applicant that they would likely be found intentionally homeless, were adopted in a bid to dissuade potential applicants. These findings are likely to reflect the underlying lack of resources which recurrently plagues LAHOSs and the nature of the Housing Act itself, which invokes a set of hurdles that must be satisfied before an applicant can be conferred the status of statutorily homeless (Evans 1999).
It has been shown that LAHOS practitioners may ensure service users are effectively denied their legal right to make a homeless application with the adoption of a number of strategies. For example initial assessments may not be conducted thoroughly (Bowpitt et al 2011; Reeve and Batty 2011; Rashleigh 2005), or service users are discouraged from making an application on the premise that they would be unlikely to pass specific homeless tests (Niner 1989). For example potential applicants may be advised that they could not apply as homeless as they had no local connection or priority need (Reeve 2006, p. 77). In some cases households were found to be signposted to prevention rather than statutory provision (Pawson 2007; Rashleigh 2005), despite this practice being unlawful (EWHC52 2007). Moreover, it has been found that practitioners at times adopted aggressive strategies (Cowan 2011), withheld or provided insufficient information (Quilgars and Pleace 2010; Lidstone 1994), adopted delaying tactics or requested more evidence than a potential applicant was legally bound to supply (Reeve 2006; Loveland 1991; Niner 1989) to discourage people from requesting a homeless application. One example in respect of the latter are investigations which found that children being asked to leave the parental home may be advised that a court order must be obtained (Loveland 1991; Niner 1989) despite the fact that in law this is not required due to the child’s status as an excluded occupier (Parliament 1977).

It has also been found that service users may not even get to speak to a homelessness caseworker, as was the case for a third of the respondents in Reeve and Batty’s (2011) investigation. While a few investigators found evidence of gatekeeping via the testimony of frontline decision makers (Rashleigh 2005; Loveland 1991), others uncovered it via the direct experience of service users (Bowpitt et al 2011; Reeve and Batty 2011) notably through mystery shopper exercises (Cheeseman 2011; BHUG 2009). For example Brent Homeless User Group (BHUG) (2009) undertook mystery shopper visits to LAHOSs across five London Boroughs and found that in nearly all cases single people were denied their legal right to a homeless application, or provided with inadequate levels of advice and assistance. Furthermore, the mystery shoppers whom the researchers’ viewed as displaying characteristics indicative of a potential priority need were advised that they did not in fact fit this criterion, despite no real assessment of their conditions (BHUG 2009). With regard to London authorities, research carried out by Reeve et al (2006) suggested that women who approached LAHOSs in this area as homeless were more likely to be subjected to illegitimate gatekeeping; which was linked to the more extreme shortages of accommodation in London areas. Although the previous administration publicly warned LAHOSs not to adopt
gatekeeping practices (EWCA1122 2007), a Local Government Ombudsman (2011) report confirmed that homeless applications continued to be blocked via the misappropriation of prevention, delaying tactics and misuse of the law around local connection and priority need categories.

Factors that may lead to gatekeeping
Attempts to dissect the causations of gatekeeping can be complex, as practitioners may be unwilling to reveal to a researcher ways in which they may flout the law. For example, when Rashleigh (2005) asked LAHOS decision makers if they had refused to allow someone to make a homeless application despite knowing they were legally entitled to do so, most declined to answer, but of those who did all admitted they had gatekepted. In a similar vein to Lipsky’s (1980) main argument and highlighted in the previous chapter, it has been maintained that gatekeeping is generally attributable to organisational or macro led pressures and is not an exercise of power on the part of a given employee. That is, gatekeeping is practiced as a reaction to top down directives which officers are relatively powerless to influence (Rashleigh 2005). It has moreover been maintained that the coping behaviours which may lead to gatekeeping are almost unconsciously followed by employees (Seal 2007). Halliday (2000) concurred that gatekeeping was not necessarily a deliberate weapon utilized by practitioners, but rather, incidental to the aforementioned work practices that help to manage limited resources. However, whilst meso or macro level pressures undoubtedly impact upon decision making it is argued that findings such as Rashleigh’s (2005) suggest officers are fully aware that they participate in unlawful actions (see below).

As highlighted in the introduction the main factors which contributed toward gatekeeping behaviour bear close parallels to the concepts present in the SLB framework, relating as they do to budgetary concerns, policy ambiguity and the consequence of adopting specific coping mechanisms. For example Rashleigh (2005) found that frontline workers saw it as their duty to protect limited resources by ensuring the homelessness route appeared unappealing

It is my job to ration council housing so therefore I am the gatekeeper. I make the route to that resource as long and as unpopular as possible (p21)

Some investigations found that a lack of emergency (Halliday 2000) and settled accommodation may also be a causal factor, whereby authorities with plentiful housing stock
were found to apply a looser criterion than those with a shortage (Evans 1999, p138; Niner 1989). Related to this Bowpitt et al (2011) found that LAHOSs at times were not adequately investigating the vulnerabilities of single people due to a lack of housing resources that could be offered. However, Rashleigh (2005) found that even in areas where social housing was relatively plentiful, gatekeeping practices ensued, perhaps highlighting the power of a target driven workforce that at times may fail to take resources into account (a further point is that the respective budgets of LAHOS and social housing allocation departments may not necessarily operate in harmony).

Chun and Rainey (2005) maintained that multiple or conflicting goals (which as discussed above, has been found to exist within the LAHOS role) will lead practitioners to make decisions around those which are the most important. So perhaps in the case of LAHOSs, objectives which relate to keeping statutory homeless acceptances or use of temporary accommodation to a minimum will take precedence over using resources to ensure adequate housing assistance is provided. For example, as touched upon above, the need to meet targets was shown to be a contributory factor of gatekeeping behaviours and Rashleigh (2005) found that housing law was repeatedly and flagrantly broken for this reason: ‘We go out of our way to push the law. If we’re challenged, then we reconsider. If we’re not, then we get away with it’ (p18). Most participants advised that as long as pressure to reduce homeless acceptances existed, gatekeeping would persist. It was further disclosed that officers who had higher acceptance rates were labelled as ‘soft’ and that this hardened culture had resulted in many people who were entitled to assistance being turned away (Rashleigh 2005); this type of peer pressure was also identified in respect of limiting the use of B&B’s (Halliday 2000). In their qualitative examination of LAHOSs internal review procedures Cowan et al (2006) observed that even senior staff felt pressurised to conform to the expectations of colleagues. This links in to the discussions above around how day to day practices and localised pressures can supersede strict legal interpretation on the frontline. Yet in respect of the latter it is reiterated that localised systems or rules in many respects evolve due to macro level political imperatives, alongside local level concerns.

**Challenges to gatekeeping**

While, as discussed in Chapter Two, service users can request a judicial review if they deem that a given LAHOS had erred in law, it has been argued that they will not necessarily be made aware of this option or have access to legal help (see below). It has further been pointed
out that service users will not generally possess detailed knowledge of housing policy (Reeve and Batty 2011; Crisis 2009), feel powerless to alter its path (Cowan and Halliday 2003) or have no access to the internal mechanisms at play (Lidstone 1994; Lipsky 1980, p53). It has further been maintained that service users may fail to recognise the discretionary element that ultimately permeates the decision making process, thus assuming the service they have been provided with is acceptable (Cowan and Halliday 2003, p132). An additional hindrance for service users subject to gatekeeping is that due to its status as an informal assessment with no official decision, it is more difficult to appeal (Foster 1983, p15). The fact that there are only a few examples of gatekeeping being successfully challenged through the courts despite its apparent prevalence lends support to arguments that service users are not, in the main, challenging illegitimate discretionary practices. Yet research has found that in the few cases where service users are aware of their legal rights, it had made the difference between being provided with housing, or being turned away with no assistance (Reeve et al 2006, p. 78).

It could be argued that successful challenges may diminish even further over time due to the fact that third sector agencies are facing funding constraints and losing sections of their workforce (Homeless Link 2009), thus reducing their crucial role in ensuring service users have access to legal recourse in any case (Holmes 2006, p99). However, another potential reason for the small number of legal disputes may be due to officer’s backtracking and taking a formal application where accusations of gatekeeping have been made. As LAHOSs would be unlikely to record this type of action its occurrence on a wider scale can only be speculated upon. Although no research relating to this topic was found this behaviour was identified by the TSO representatives during the fieldwork of this project and is therefore discussed further in Chapter Seven.

**Overview of research and critique**

The researchers above have provided informative insights into the ways in which LAHOS practitioners may interpret or distort housing policy at the local level. But a few did not necessarily recognise more deliberative practices in the conduct observed. For instance despite presenting evidence which showed that frontline staff consciously practiced gatekeeping Rashleigh (2005) nevertheless maintained that an officers repeated refusal to take a homeless application from a priority need household demonstrated a lack of understanding in how to apply legislation. Likewise Reeve and Batty (2011, p5) argued that Central Government must put tighter controls in place to ensure local authorities adhere to the
principles of the Housing Act. Following BHUG’s (2009) findings that LAHOS were not adhering to housing law Crisis similarly suggested that practitioners should better equip themselves to grasp it.

The above arguments suggest that an enhanced comprehension of relevant legislation would improve the quality of assistance and advice offered to service users. Although this argument is sensible, improved knowledge is necessary but not sufficient to achieve this outcome. For example it was learned above that LAHOSs have been found to be secretive when their actions are questioned (Rashleigh 2005), so it may be difficult for an agency such as BHUG to be confident they can draw conclusions that contravention is due to ignorance rather than obstructive practices. This argument further does not give regard to evidence that practitioners within the public service sector are aware they breach policy, but for various reasons choose to do so, rather than through ignorance of a law (Lindblom and Woodhouse 1993; Lipsky 1980).

Related to this latter point a few researchers found that decision makers believed they were highly proficient in interpreting the law and gave no reason to suggest this was not the case. For instance Loveland (1991, pp7-8) found that frontline officers perceived themselves to be in a unique position to comprehend complex housing legislation and felt that councillors and even senior officers had poor legal skills and a limited conception of housing policy. Further, Bretherton et al (2013) showed that decision makers placed their ability to interpret medical conditions above those of the service users own GP at times. Although this belief may have been misguided, it demonstrates that the issue is not necessarily due to a lack of training, but rather, the particular views or objectives held by those who make decisions. However, it is not suggested that LAHOSs are necessarily well versed in housing law, accepting that practitioners may fail to keep up to date with legal developments (Cowan 2011, p151). But the evidence outlined above suggests that a number of other factors unrelated to knowledge of the role are at play. Ultimately, it has been pointed out that the legalistic side of the role is low on a practitioners list of priorities in a pressured environment, as day to day challenges and how best to resolve them with the limited resources available takes precedence (Loveland 1991).

Some researchers had a tendency to make somewhat premature assumptions based on what housing legislature appeared to instruct. For example Cohen et al (2001, p172) suggested that
older people were better protected in the UK than the USA as vulnerability due to old age was conferred in the Housing Act. But as identified in Chapter One this policy area cannot be accepted at face value, as the term ‘vulnerability’ as opposed to ‘older’ tends to become the focus of a given decision makers judgement. Pawson and Davidson (2007, p20) referred to the credence of regulatory bodies such as the Audit Commission to moderate LAHOSs capacity to flout housing policy. However, LAHOSs would arguably display more recalcitrance and conceal less savoury practices from regulatory bodies to an even greater extent than they would from researchers, or ‘play the system’ for the benefit of the auditors (Davies 2012, p774). In summary, much of the research indicates that miscomprehension may potentially be adopted as a smokescreen in order to keep homeless acceptances low.

It is finally important to stress that it is not suggested that dramatically reduced statutory homeless figures have been achieved primarily as a result of legal manipulation or negative practices. It is accepted that homelessness prevention can be viewed as a positive step toward tackling housing shortage and making cost savings (Pawson et al 2007, p9) whilst achieving prevention objectives by ensuring households can remain in their homes, or secure suitable alternatives (Busch-Geertsema and Fitzpatrick 2008; Pawson and Davidson 2007, p15). Rather, the aim is to highlight areas where policy may be applied to handle specific pressures and the ways in which these may affect the quality of help service users can expect to receive. It is moreover informed by research which shows that many instances of rooflessness could be avoided if adequate statutory services or options are made available (Reeve and Batty 2011).

**The non statutory environment**

This section considers organisations that provide legal or general advice to households who are dissatisfied with LAHOSs. TSO’s have been shown to play a pivotal function in ensuring that those who are denied appropriate housing assistance have access to advice or legal recourse (Jones and Please 2010; Quilgars and Pleece 2010, p137; Holmes 2006, p99; Pannell and Blood 2003, p20), act as an invaluable housing advice service to augment that offered by LAHOSs (Pawson et al 2007, p10; Warnes et al 2003) and better ensure success if service users wish to challenge negative decisions (Cowan and Halliday 2003). Where TSO’s have been discussed so far it has referred to those who carry out a specific legal function around providing advice, normally with the assistance of legal aid funding provided by the Legal Service Commission (LSC). It needs to be noted that private organisations may also
receive funding from the LSC to aid service users, but a more detailed discussion is not provided here.

Although it was initially suggested that the Coalition Government’s ‘Big Society’ initiative would channel funds toward the third sector (Buckingham 2010) evidence suggests they are losing out overall. For example supporting people budgets\(^5\) have been reduced and legal aid funding slashed by £350 million (Ministry of Justice 2011). Further, it has been estimated that voluntary sector funding will fall by a total of £3.3 billion between 2010 and 2016 (Civil Exchange 2012). It is not surprising to find that within this backdrop organisations that assist the homeless are diminishing (Bury 2012; Homeless Link 2012; Jones and Pleace 2010, p5). For example Shelter, one of the main organisations that provide legal advice to homeless households nationally, has seen calls from households threatened with homelessness soar by around four fifths in the last three years (Twinch 2012). Yet despite these increases they are in the process of closing offices as a direct result of financial loss to the legal services budget (Twinch 2013). Although some cuts will affect households at threat of homelessness directly, many will impact upon it more implicitly. For instance the Citizens Advice Bureau experienced losses to LSC funding for debt, welfare benefit and employment problems, which can all lead to homelessness if help is not made available at the outset (Citizens Advice 2012).

\textit{TSO’s and older people affected by homelessness}

Third sector projects which cater exclusively for older people at risk of homelessness emerged in the 1990s due to a recognition that their specific housing needs could not adequately be met through generic services, but these are still a small number in relative terms (Crane et al 2010), with provision commonly hidden within general purpose advice agencies (Pannell and Palmer 2004, p3). Yet it has been demonstrated that TSO’s can provide valuable help to older service users. For example, Parry and Means (1999) found that the charitable organisations in their study successfully campaigned to get negative decisions overturned and Pannell and Blood (2003) established that in many cases older people would only be given appropriate help once a charitable agency intervened.

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\(^5\) Supporting People was aimed at enabling vulnerable people with housing related support needs to live independently in the community.
However, despite these findings evidence suggests that universal voluntary agencies are more likely to target their services toward the young (Homeless Link 2011a). Older people concur that they view organisations that provide general assistance, such as Shelter and the Citizens Advice Bureau as being for younger people (Pannell and Blood 2003, p21). It has also been pointed out that the aforementioned cuts will inevitably lead to a reduction of current homeless prevention services for older people (AgeUK 2011b). There are specific examples of advice and advocacy services aimed at older people being disbanded due to loss of funding, for example Better Government for Older People, whose aim was to influence policy development, and The UK Coalition of Older Homeless, which proffered a valuable resource in terms of highlighting the plight of older people at risk of homelessness and connecting dispersed agencies through action research (Pannell and Palmer 2004, p6).

TSO’s are essentially reliant on sufficient funding to operate and assist policy makers in reaching centrally set goals (Jones and Pleace 2010, p6). Yet it has been pointed out that funding bodies tend to concern themselves with numerical outputs and value quantity over quality when determining how successful a project has proved to be (Help the Aged 1999, p2). Perhaps this is the reason many organisations have been viewed as giving priority to less complex individuals, or those with relatively few issues, as it ensures financially viability to assist more people (Ravenhill 2008; Pannell and Palmer 2004, p3). Yet these funding priorities have been found not to suit older people, as they normally require more intensive, holistic (Parry and Means 1999) support over a longer period (Pannell and Palmer 2004). Quantitative evaluative tools are further unlikely to capture the quality of long term and intensive work that has been undertaken for older people affected by homelessness (Help the Aged 1999, p3). In summary TSO’s aimed at older people affected by homelessness are at present insufficient and are further diminishing due to the current politically austere climate. This is unfortunate in light of the evidence which shows that this type of organisation can make a real difference to older LAHOS users (this topic is returned to in Chapter’s Seven, Eight and Nine).

**Homelessness and older people: theory, policy and practice**
The following sections consider the prevalence, causes, relevant policy and LAHOS response to homelessness in respect of older people. Although specific statutory experiences connected to homelessness will apply to some older people, such as those classified as non priority, it is
argued that research which fails to distinguish older people as a unique group in their own right (as is the case for studies which focus on youth homelessness) may fail to capture the multiplicity of layers that age contributes to the experience. As highlighted in the introduction, numerous scholars have recognised that older people in housing need have a diverse and often complex set of circumstances (Crane et al 2010; Pannell and Palmer 2004; Willcock 2004; Carlton et al 2003; Pannell et al 2002; DeMallie et al 1997), with the factors contributing toward their homelessness assessed as qualitatively distinct (Means 2007, p72; Pannell et al 2002; Evans 1999, p136). Yet it has been argued that academic insights in respect of homelessness and older people in the UK continue to be neglected or marginalised (Crane et al 2010) as is the case with policy makers (discussed below). Furthermore, where housing problems amongst this group have been studied there has been a tendency to concentrate on those who are roofless (Wilson 1995, p5), or require support in their own home (see below).

**How prevalent is homelessness among older people**

There are no reliable official (or unofficial) figures available in respect of people over 50 at threat of, or literally homeless in England, though it has been maintained that numbers are increasing due to the exponential rise of this group (Crane et al 2010; Cohen et al 2001, p167). In respect of rooflessness it has been estimated that around one third of rough sleepers in London are over 46 (with 10% of this number being over the age of 55, CHAIN 2012, p24). With reference to statutory homelessness it has been argued that older people may be missed due to partial monitoring strategies (Homeless Link 2010d). For example, vulnerability due to old age is rarely applied as it tends to be subsumed within other categories, such as ill health (Pannell and Palmer 2004, p21). However, though a low proportion of all acceptances, assessment of vulnerability due to older age has risen by over a quarter in the last few years (DCLG 2013a). Alongside this official figures show that in the first quarter of 2014, of all statutory homeless households, an applicant is over 45 in just under one fifth of cases (DCLG 2014a, Table 781). In fact the average age of the main applicant has risen exponentially since 2006, from 12% in 2006 to 17% in 2013 (DCLG 2014a, Table 781). Moreover, initial estimates based on the first quarter of 2014 suggest this upward trend is continuing, with the figure recorded as 18% (DCLG 2014a, Table 781).

The lack of data on the incidence of homelessness amongst older people tends to be starker when cases where it is hidden are considered (Homeless Link 2010d), particularly as
estimates do not corroborate each other’s findings. For example AgeUK (2011a, p15) put unofficial homelessness for the over 65s in the UK at around 42,000, yet writing a few years earlier Pannell and Palmer (2004) estimated around two thirds of this figure despite incorporating the lower 50-64 age group in their calculation. However, in spite of this lower number Pannell and Palmer (2004, p53) determined that a further 360,000 people over 50 lived with friends or relatives and viewed it likely that many required more suitable housing. This latter observation is an apt demonstration of why attempting to measure concealed homelessness within the older population (and other age groups) is so problematic, as an unknown number of those who reside with others may be unsuitably housed and require alternative accommodation.

As Pannell and Palmer provided a partial estimate and AgeUK only factored in people over 65, the findings of Reeve and Batty (2011) were collated with current estimates of the total hidden homeless population in the UK (Labour Force Survey 2010, cited by Fitzpatrick et al 2012, pxviii). The former calculated that around 14% of concealed homelessness contained a person over 50 and the latter placed hidden homelessness as a whole at 1.5 million. This provides an estimate of concealed homelessness amongst older people at just over 200,000. However, this figure is presented with a caveat that actual numbers may in fact be higher, particularly as research findings have suggested incidences of homelessness in respect of older people are more likely to be invisible when compared to other groups. For example it has been found that older people are statistically less likely to present to LAHOSs and that around half do not seek advice prior to becoming roofless (Crane et al 2004, p5; Burrows 1997, p52).

The relevant factors which contributed to the lower reported incidences of older people seeking LAHOS help included ignorance of its existence (Warnes and Crane 2006; Pannell and Palmer 2004, p19) the perception that statutory services would not be targeted toward their specific needs (Pannell and Palmer 2004; Pannell 2002b; Parry and Means 1999, p6; Kitchen and Welsh 1998, p4), the assumption that they would not be assessed as a priority (Warnes and Crane 2006) and distrust of dealing with agencies or people they did not know (Pannell and Blood 2003, p21). In respect of the latter it was found that older people were more likely to rely on existing support networks or family for advice on their housing situation, which often resulted in them not accessing appropriate specialist assistance (Pannell and Blood 2003, p21; Parry and Means 1999). Moreover, it has been found that if an older
person has a negative experience within a statutory division (perhaps a dispute over housing benefit) this may lead them to distrust other departments (Pannell and Blood 2003, p22). A final consideration is that older people who become at risk of homelessness in areas of plentiful sheltered accommodation may never be recorded, due to quick provision of a property to avoid the homeless route (Hawes 1997, p9). Whilst this may equate to a positive outcome it does hide from view incidences where older people do in fact find themselves in housing difficulty that is unattached to limited physical or sensory ability, which as highlighted in Chapter One and below, may contribute toward a myth that homelessness does not happen to older people.

**The causes of homelessness in the older population**

The next few sections consider the circumstances in which older people may find themselves affected by homelessness in more detail. Although the chief aim of this thesis is to consider public sector delivery to older people at threat of homelessness, it is important to understand the reasons why this group may approach LAHOSs, as this can potentially inform effective policy and delivery responses. The intention is not to provide an exhaustive list of ‘triggers’ as older people may experience a myriad of mitigating factors that contribute toward housing difficulty. In a similar vein, a focus on particular causes should not be treated as a vacuum of disparate entities, but rather as interconnected and relating to (generally a mix of) personal, social, economic and political factors, which is where an analysis of homelessness pathway approaches proved helpful. Whilst there are a number of different perspectives which can assist in an understanding of the factors that may cause homelessness (Somerville 2013), it is judged that pathway models are the most developed due to incorporating individual, structural and chronological elements (although, it is not without problems and these are considered below). According to Anderson (2001) a pathway approach to homelessness can elucidate factors that impact upon the:

> Processes and dynamics at work in relation to the housing careers and life trajectories of individuals and households who experience homelessness at some point in their lives (p1)

The latter part of this quote refers to its focus on the life course which may relate to potential pathways into, through, or out of homelessness at various stages of a person’s life (Anderson 2001). A number of scholars have applied a pathways approach to assist in an understanding
of how people lose their home and experience homelessness (for example Chamberlain and Johnson 2011; Fitzpatrick 1999), but the examples considered here are mainly limited to two studies which either explicitly factored age into the pathways (Crane and Warnes), or designed them with older people in mind (Anderson and Tulloch). Furthermore, although investigations which refer to the potential pathways through or out of homelessness are undoubtedly important, pathways into homelessness is chiefly considered due to a focus on the assistance available to those at threat thereof.

*Anderson and Tulloch*

Anderson and Tulloch (2001) identified age as a key factor (gender was acknowledged as a secondary indicator) during the development of their homelessness pathway model and subsequently devised youth (15-24), adult (20 to 50 years) and later life (50+ years) paths. In respect of later life, it was suggested that potential causes of homelessness included redundancy, loss of parents (if the older person was dependent on them), widowhood, marital breakdown and mental illness. It was stated that unlike younger pathway groups, the ‘triggers’ which may lead to homelessness would likely be as a result of individual (aside from redundancy) rather than structural factors (Anderson and Tulloch 2001). Although the more explicit utilisation of a life course element is welcomed, providing an important reminder that homelessness itself is fluid and will require different policy responses at various stages of a life cycle (Pillinger 2007), there is a concern that the over 50s have been thrown together into one (very broad) category.

A more serious charge is that it may focus political attention toward areas traditionally assumed to be associated with ageing to the detriment of other factors. For example although Anderson (2001) conceded that age specific pathways would inevitably overlap, it is still of concern that the pathway for the over 50s gives less emphasis to structural causations, thus failing to include any reference to housing costs or affordability. Yet Crane et al (2010, p10) research into the causes of street homelessness for older people in England found that only a third could be attributed primarily to personal factors (see below). It was further disclosed by Anderson and Tulloch (2001) that due to a shortage of studies around older homelessness the earlier work of Crane and colleagues was the main source which informed the older pathway. This indicates that its formulation was not based on as developed a base as for younger age cohorts, where investigations were (and are) more plentiful.
Crane and colleagues

A more sophisticated application of a pathway approach to homelessness in respect of older people is that of Crane and colleagues (2013, 2012, 2007, 2006, 2004, 2000, 1997). This work attempted to capture the complex interaction of individual and structural factors which may result in people over 50 losing their home and was based on a comparative research project undertaken in England, Australia, and the USA. Data gathered from 131 older people in England uncovered 18 different factors which had led to their homelessness. Significant differences between 'older old' and 'younger old' were identified, which lends further support to the above argument that Anderson and Tulloch’s (2001) singular pathway for older people is not sufficient to capture the triggers that may lead to homelessness in respect of this group. Crane et al (2006, pp412-415) provided a set of causes of homelessness which they referred to as 'clusters of triggers'. This culminated in five 'packages of reasons' for homelessness:

- Problems with condition of housing or tenure
- Breakdown of marital/cohabiting relationship
- Financial problems and rent arrears
- Problems with co tenants or neighbours
- Death of relative or close friend

Alongside these main pathways an older person may experience problems due to mental health, poor living, illiteracy, or substance abuse which would increase the likelihood that the ‘package of reasons’ highlighted above would lead to homelessness. This analysis satisfies Somerville’s (2013) argument for a multidimensional conceptual framework, but it is argued that no analysis can realistically cover all the potential causes of homelessness. A further issue is that the sample was relatively small given the aim of the project which was to present a working framework that could be applied to all older people. It is argued, as suggested by Crane et al (2006) themselves, that a larger sample would be required to produce a more robust framework, as at present it is reasonable to say that a different set of factors may present themselves if the study were repeated.

For example although the concepts identified extend those of Anderson and Tulloch no mention is made of homelessness due to domestic violence, which has been found to foster
unique problems that will not be in evidence in other types of relationship breakdown. For instance it has been maintained that older people who experience domestic violence are not as assertive as younger cohorts, may be less likely to define an experience as domestic violence and feel more embarrassed about approaching services (Barron 2007). This supports arguments that older people who experience domestic violence will have unique needs that are qualitatively distinct from younger age groups, yet this is perhaps not recognised as there is little specialist provision or assistance available (Barron 2007; Blood 2004). Supporting this, Quilgars and Pleace (2010) found that nearly a quarter of authorities and just under a third of service providers felt there was insufficient help available to older people affected by domestic violence. It could be argued that if either of the above pathway models were given regard by policy makers, it would continue to be ignored, as it is not identified as a potential cause of homelessness.

Applying homeless pathways to older people
A perhaps more fundamental issue with developing unique pathways to reflect how older people experience homelessness is the contention that this group has both widely variant ‘sub-groups’, relating to gender or social status for example, as well as the aforementioned differing ‘sub-age groups’ (Hawes 1997, p5). A recognition that older people themselves are heterogeneous and will differ from one another presents Anderson and Tulloch’s older pathway in particular as rather unidimensional. Fopp (2009) went as far as to suggest that use of the term pathway was ‘superfluous’, merely serving as a metaphor which tended to reflect the aims or views of the researcher(s) rather than the reality of why people experience homelessness. With regard to this latter point and as stated above, there is a concern that if policy makers follow theoretically defined pathways relating to older people, those who present with ‘non typical’ housing issues may not receive the targeted assistance they require. Yet to attempt a model which incorporates the interrelationship between various characteristics becomes very complex and arguably the numbers required to undertake such an all inclusive analysis would make an effective pathway model impracticable. This is reminiscent of the reasons given by Lipsky (1980) for focusing on broader observations when conceptualising the SLB.

However, it is maintained that despite its limitations pathways research can be applied to identify common triggers which may cause older people to experience housing difficulties.
This may help ensure that in at least some cases more targeted, appropriate assistance is provided, which has been identified as an important factor when conceiving of pathways ‘out’ of homelessness (Pillinger 2007, p65). It has further been maintained that a pathways approach can aid policy makers in gaining a deeper understanding of the array of complex factors at play (Pillinger 2007, p66), moving away from more primitive structural versus individualistic arguments (Somerville 2013):

In order for preventative policies to work in practice, there needs to be an evidence base informed by both the structural causes and the personal histories that impact on homelessness Pillinger (2007, p11)

Finally, it is believed that developing a framework, even if viewed as metaphoric, provides a useful understanding of the interconnectedness of what may at first appear to be disparate causations.

Older homelessness in the contemporary climate
The pathway approaches discussed above found that the factors involved when an older person loses their home are qualitatively distinct to those of younger groups, which is broadly supported by the wider literature in this area. For example it has been pointed out that older people are more likely to have experienced longer term employment, a growing family and to have lived in different types of tenure prior to becoming homeless (Pannell and Palmer 2004, p16; Carlton et al 2003, p36). Alongside this it has been established that older people have an increased likelihood of losing their home through retirement, loss of tied accommodation (Crane 1999, p86), widowhood (Age Concern 2008; Pannell and Palmer 2004, p16) or due to physical illness connected to age (St Mungos 2004, pp11-12; Pannell and Palmer 2004, p16; Kitchen and Welsh 1998, p17).

However, as noted by Crane and Warnes (2006) following their research, homelessness in older age may also be due to causatory factors which affect all age groups. For instance a high proportion of homelessness in later life has been attributed to relationship breakdown (Pannell and Palmer 2004, p16; Crane 1999, pp52-57; Kitchen and Welsh 1998, p16) mental illness (St Mungos 2004, pp11-12; Crane 1999, p86; Kitchen and Welsh 1998, p17) and discharge from the armed forces (St Mungos 2004, pp11-12; Crane 1999, p86). Crane and Warnes (1997, p12) further established that over half of roofless respondents had come from broken or unsettled homes. The following three sections explore a selection of investigations
chosen to reflect upon how the current environment, specifically relating to an ongoing downturn and political austerity drive, may impact on the housing outcomes of older people. It firstly concentrates on financial and employment factors before considering potential barriers associated with private rented tenures. The latter has been included due to the argument put forward in Chapter Two that private rental is increasingly becoming the only viable option for many households seeking accommodation.

**Economic and welfare factors**

Whilst it has been argued that the economic activity of older people is overemphasised in policy wide discussions around active ageing (Walker and Maltby 2012), scholars exploring housing problems with regard to this group at times placed less emphasis on financial factors, as touched upon above. Yet it is reiterated that older people in many respects are equally as susceptible to experiencing housing difficulty due to structural shifts as their younger counterparts (Crane et al 2010). For example Crane et al (2004a, p9) found that one fifth of older people interviewed had lost their home due to affordability issues. Scholars have thus maintained that preventative work which focuses on the economic situation of older people is essential (Warnes and Crane 2006, p413; Pannell and Blood 2003, p10; Pannell et al 2002; Pannell 2002a, p6).

Further, whilst it has been asserted that the so called ‘baby boomers’ (those born in the mid 1950s to mid 60s) have experienced a relatively favourable trajectory in terms of housing and welfare policy conditions (Ronald and Elsinga 2012, p18), research in the USA found that rooflessness amongst this group has been rising steadily since the 1990s, with the trend looking set to continue due to the rising proportion of older people (Kushel 2012, p5; Hearth and CHS 2011). Moreover, in respect of the UK it has been argued that older age groups were most adversely affected by the downturn (Cohen 2011). For instance AgeUK (2013) established that a quarter of people over 50 feared they may lose their home due to the current low interest rates on savings (also, see Fenge 2012), high cost of living and being unable to secure employment to pay the rent or mortgage (AgeUK 2013). In a similar vein while the Welfare Reform Act (Parliament 2012) may have left those over retirement age relatively unscathed, people in their 50s experience LHA (with the exception of shared room rate changes) or other cuts to the same extent as any other age group. Alongside this, older people under retirement age may be affected by the spare room subsidy (the so called bedroom tax) in cases where children have left home.
Employment

Successive governments have acknowledged the link between unemployment and housing, with a recognition that one will have a direct and negative impact on the other (DCLG 2008a), as have the charitable sector (Homeless Link 2010a) and academic researchers (Fitzpatrick et al 2011, p7). Further, some pathway approaches have identified inadequate employment (Pillinger 2007; May 2000) and redundancy (Anderson and Tulloch 2001) as one of the chief triggers that may lead to homelessness. An example of a link between older rooflessness and employment prospects is Okamoto’s (2007) research in Japan, which found that a relatively large proportion of street homeless people were over 50 and 75% attributed losing their home to unfavourable employment conditions. The author contended that employment may be less of a determinant of homelessness in England due its relatively favourable social welfare institutions (Okamoto 2007). Yet this so called ‘safety net’ does not necessarily capture all of those in need; in fact, in light of arguments that older people are less assertive than their younger counterparts (Pannell and Palmer 2004, p3) it is suggested that some may fail to seek advice if welfare benefits are stopped or if an overpayment is accrued for any reason (Pannell 2002a).

It has been determined that the downturn has had a direct and negative impact on older workers, whereby some have been forced into retirement as companies look to ease financial pressures (AgeUK 2010); this has further been found to have had a more pronounced effect on women (Cory 2012). Figures show that older people who have been unemployed for over a year (this does not include those who claim out of work benefits but may be looking for work, see below) has risen from around a third to 45% in recent years (Boffey 2012). Alongside this research has indicated that if unemployment is experienced by someone over 50 for a significant period of time, it is unlikely they will become economically active in the future (AgeUK 2013).

Yet despite an increase in economically inactive 50-64 year olds, national and local schemes favour younger people (AgeUK 2011b, pp56-57). For example though the stated intention of ‘The Work Programme’ is to ensure those with the greatest need are assisted into employment it does not recognise older people as a distinct group (DWP 2011). This is despite a recognition that assisted employment schemes can reduce the risk of homelessness (AgeUK 2011b; Ravenhill 2008, pp58-59; ODPM 2005b, p24). One final issue refers to a point made that employment rates among older people are notoriously difficult to measure, as
they are less likely to class themselves as work seekers than younger groups. They are thus more likely to claim out of work benefits, even though they may actually prefer to be in employment (Cory 2012).

*Private rented tenures*

Investigations which have explicitly focused on the experiences of older tenants in private rented tenures has been scarce (Rugg and Croucher 2010), though recent findings confirm that people over 65 who occupy this type of tenure are increasing (Salsbury 2012). A DCLG (2008b, p24) report suggested that around one third of older people lived in hazardous or non decent housing and in respect of private rented accommodation it has been pointed out that older tenants as a whole tend to live in poorer conditions than their younger counterparts (DCLG 2008b, p74). It has further been maintained that older people are particularly vulnerable to abuse in the private sector, but are unaware of their legal rights or where to get advice, so often their plight is invisible to services (Carlton et al 2003).

Although older people who secured private rented accommodation before 1988 may reside in protected tenancies, many are in poor condition (Rugg and Croucher 2010). Moreover, tenants may suffer harassment at the hands of landlords who wish to gain possession, but are unable to do so unless the terms of the tenancy agreement are broken (Carlton et al 2003). It has been suggested that post 1988 assured shorthold tenancies are more transient than other tenures (Rugg 2008, p7) and designed with younger mobile professionals in mind as the limited security of tenure is perhaps not as suitable for older people who may wish to settle (Carlton et al 2003). For example it has been found that older people with assured shorthold tenancies are concerned about the long term security and future affordability of their accommodation (Rugg and Croucher 2010).

While not the main focus of this thesis, people over retirement age in particular may struggle to access private rented tenures as some agencies can request up to six months rent in advance (Bharaji and Emerson 2009, p10), which many may not be able to afford, particularly if they are living off of a means tested pension (Bharaji and Emerson 2009, p15). Furthermore, the recent reductions to LHA (as discussed in Chapter Two) will deepen the financial burden. If tenants are unable to make up a rent shortfall it could potentially lead to rooflessness (Jones and Pleace 2010, p5; Rugg 2008), particularly as rent arrears have been

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6 This is similar to an assured or secure tenancy, these were abolished following the Housing Act 1988 and replaced by assured shorthold tenancies
cited by landlords as the primary reason for terminating a tenancy (DCLG 2014a). An additional concern relates to older people who require adapted accommodation, as they may have difficulty accessing a suitable property in this sector (Rugg and Croucher 2010). It is finally important to note that the intention is not to present private rented accommodation in a negative light, but rather to highlight the potential pitfalls this tenure may have for some older people. For example during their research Rugg and Croucher (2010) observed that many older people had a positive relationship with their landlord and those with mobility issues had arranged for some adaptations to be undertaken at the property.

The themes covered above emphasise that the current climate can negatively impact upon older people in a number of interconnected areas and would undoubtedly benefit from early intervention. But as will be shown in the next few sections, the tools to achieve this are not currently in place.

Policy and practice responses to older people affected by homelessness

Statutory responses
Warnes and Crane (2006, p417) established that around one third of older people in their study had lost accommodation due to policy deficiencies which left a gap between funding and services required to confront the problem. They further identified an apparent lack of any coherent relationship between statutory agencies and older homeless people, arguing that many potential evictions could have been averted if social landlords, health professionals and benefit agencies collated information when someone was facing difficulties in any of these areas (Warnes and Crane 2006, p413). It was argued that even in cases where an older person had lost their home due to a perceived deliberate act, this was normally cumulative and as a result of vulnerabilities that agencies had neglected to address (Warnes and Crane 2006, p417). It has moreover been maintained that where services attempt to address older people at threat of losing their home, they tend to be patchy geographically and pay insufficient regard to prevention (Pannell and Palmer 2004, p4). It has additionally been shown that older people who seek housing assistance at an early stage tend to be offered limited advice by statutory services (Parkinson and Pierpont 2000, cited in Pannell and Blood 2003, p20). On a final note, it has been claimed that the recent cuts to local authority expenditure is likely to further
reduce the already limited services available to meet the needs of older people affected by homelessness (AgeUK 2011b).

Inadequate levels of provision are undoubtedly due, at least in part, to resource scarcity, but it has also been attributed to a lack of statutory understanding around the needs of older people who experience homelessness. For example it has been maintained that policy which deals with housing and older people tends to concentrate on problems that may be present in their current accommodation, as opposed to lack of or living in insecure housing (Pannell 2002b). This focus toward ensuring provision for care and support is evident in the main policy documents produced by the Coalition Government (for example DCLG 2011c). Alongside this, schemes aimed at older people, such as Lifetime Neighbourhoods, SITRA, Firststop, Housing Care, Home Improvement or handyman initiatives are similarly geared toward adaptations or support to live independently (DCLG n.d). While these initiatives are no doubt helpful to specific cohorts of older people, a lack of targeted help to those at threat of homelessness lends credence to arguments that successive Governments have failed to recognise older people as a group who may lose their home.

It has been identified as a serious flaw in social policy that older people are treated as homogenous, whereby services tend to reflect a ‘one size fits all’ principle (Age Reference Group on Equality and Human Rights 2005, p10). It is further argued that legislative documents which represent older people as a group whose primary concerns are of frailty and the need to be looked after is clearly not helpful to those who do not fit into this inveterate model. Independent living is the preferred tenure for older people, and for Government’s, as it is viewed as more cost effective alongside increasing wellbeing (Olsberg, 2012). For example it has been argued that 90% of older people do not live in supported accommodation (AgeUK 2011a, p15; Heywood et al 2002, p155) and prefer to reside in conventional housing (Higgins 1989, cited in Means 2007, p67). In England, social care policy is now geared toward maximising the wellbeing of older people and promoting ‘ageing in place’ (HM Government, 2014)

In respect of homelessness documents the latest Code of Guidance (DCLG 2006) for LAHOSs has a chapter dedicated to the needs of 16 and 17 year olds, whereby older people as a distinct group are given little mention. This neglect is further evident in the Government’s latest homelessness strategy ‘Making Every Contact Count: A joint approach
to preventing homelessness’ (DCLG 2012b). An apt demonstration relating to this lack of political awareness around the scale of the homelessness problem in respect of older groups can be found in a DCLG (2011a) report undertaken to assess the potential impact of the new discharge of duty function conferred in the Localism Act:

In 2009-10, 1 per cent of homeless acceptances had priority need because of old age. This is not disproportionate compared to the general elderly population and we have therefore not identified any equality impacts for older people (p1)

The report concluded that there were no issues to address in respect of older homelessness, yet it is argued that this is a premature evaluation on a number of counts. Firstly, the report only considered applicants who were actually accepted as a result of old age, yet as stated above, priority need is often conferred due to a secondary reason, such as ill health (Pannell 2002b; Parry and Means 1999, p6). Secondly, as official statistics only incorporate those who have been accepted as statutorily homeless (Reeve and Batty 2011; DCLG 2011d), it does not include service users assessed as ineligible for assistance, or provided with prevention options. Therefore, the report, by focusing on one particular statistic may dramatically underestimate the prevalence of homelessness in older age groups. An additional issue and as with many other official documents, the report does not attempt to conceptualise older people, merely referring to this group as ‘the elderly’, thus leaving the reader to make an educated guess. It has been argued that if statutory documents perpetuate that older homelessness is not a problem which requires attention, LAHOSs can focus more resources on other groups (Pannell and Palmer 2004, p3).

Based on the aggregate of evidence discussed above it is maintained that older people affected by homelessness are for the most part imperceptible. This cloak of invisibility in official statistics further fulfils the prophecy that older people do not need special attention, yet the findings suggest that nothing could be further from the truth. For example in respect of literal homelessness scholars have contended that the perennial perception of single rooflessness as primarily a youth phenomenon is mythological (Crane et al 2006, p157) and as highlighted above, people over 45 make up a significant proportion of this group. Yet the political (and public) perception appears to be that older people are for the most part, adequately housed (Pannell and Palmer 2004, p3; Kitchen and Welsh 1998, pp7-8). Simply put, lack of a home (aside from the popular image of a ‘bag lady’ as discussed in Chapter
One) is not generally viewed as a problem experienced by older people (Crane et al 2010, p354).

Gatekeeping and older people

Earlier in the chapter it was shown that gatekeeping practices were prevalent in LAHOSs and may act as a barrier to all potential service users; yet it has been argued that older people are more likely to be discouraged by its application (Homeless Link 2011a; Parry and Means 1999). Some of the factors that may lead to older people experiencing gatekeeping behaviours include findings that they are less assertive than younger people (Crane and Warnes 2007; Pannell and Palmer 2004, p24; Carlton et al 2003, p36; Heywood et al 2002; Pannell 2002b; Help the Aged 1999) and tend toward acquiescence when they do seek advice, however insufficient they perceive it to be (Pannell 2002; Help the Aged 1999; Parry and Means 1999, p19). Moreover, of perhaps more relevance to the ‘oldest old’, service users with cognitive defects may not be able to express themselves clearly and be sent away by officers who have not have grasped their housing need (Pannell and Palmer 2004, p32). An additional issue is that if an older person is marginalised, or has particularly complex issues, which as shown above, is often the case for this group when they seek advice, the specific skills or holistic approach required to understand their housing need may not be present (Homeless Link 2011a; Pannell and Palmer 2004, p3; Pannell and Blood 2003, p3).

These findings are a cause for concern, particularly when considered in conjunction to those outlined at the beginning of this section that many older people became homeless as a result of poor advice or because help was refused when they asked for it. Consequently, a number of scholars identified that effective preventative services at an earlier stage were critical to ensure older people did not lose their home (Ford et al 2010; Homeless Link 2010a; DCLG 2008b, p121; Pannell et al 2002; Cohen et al 2001, p177), with many recommending the employment of specialist practitioners (Barron 2007; Carlton et al 2003; Pannell and Blood 2003; Pannell et al 2002; Parry and Means 1999). However, these studies predate the current austere fiscal climate and are thus less realistic, despite evidence from the third sector and statutory sources demonstrating that preventative measures are ultimately more economical than crisis intervention (NHF 2012; DCLG 2011b).
Conclusion
This chapter has highlighted that divergent decision making occurs in LAHOSs due to individual officer differences in interpretation of housing policy and as a result of more deliberate unlawful practices, such as gatekeeping. In respect of the latter it was shown that service users experienced unequal outcomes based on circumstances or characteristics which may have little bearing on legal interpretation. Regarding findings relating to illegitimate implementation in LAHOSs it is reiterated that the broader focus favoured by Lipsky (1980) is necessary for two main reasons. It firstly brings into focus the impracticality of producing numerous variables in an attempt to cover every individual, middle or macro level reality. Secondly, the literature has shown that higher level causations, in the main, tended to drive the negative use of discretion. However, research has also identified that individual acts should not be underplayed and therefore needs to be acknowledged as a component which may potentially alter delivery mechanisms, albeit on a more isolated level.

The second part of this chapter demonstrated that older service users, particularly those at threat of homelessness, have been afforded scant political and theoretical attention. This has arguably resulted in a misrepresentation or assimilation of this unique group into other generic labels. Ultimately, evidence suggested that older people affected by homelessness have complex and distinct needs which policy is persistently failing to address. This is a concern in light of findings that if anything, homelessness amongst this group is likely to increase in parallel to the expected exponential rise in the percentage of people over 50 in the population. Perhaps the disparity in resources and facilities can be attributed to the ways in which older people affected by homelessness are obscured in statistical depictions, coupled with the aforementioned paucity of recent research focusing on this group. Taken together, these issues may fulfil the prophecy that older people do not need special attention, yet as this chapter has shown, this view is fundamentally flawed.

The previous two chapters have highlighted research around frontline implementation, homelessness and older service users and has illuminated where the gaps identified in Chapter One exist. The next chapter provides details around the research strategy employed and further shows where the literature reviewed contributed toward the methods chosen to answer the main questions.
CHAPTER FOUR

Research Strategy: Outline and Rationale

Introduction
This chapter provides a detailed outline of the main research strategy. Building on discussions in previous chapters, it begins by providing a justification for applying an implementation perspective, with reference to the methods adopted in related investigations. It was determined that the research questions would be most effectively answered with a multi-strategy design. As covered in Chapter One, an initial baseline survey was sent to all LAHOSs in England to assess broader aspects of service delivery. This was followed by individual interviews with statutory officers and a group interview with third sector professionals to gain a deeper insight into frontline LAHOS mechanisms. The methodological aims, particularly in respect of the interviews, are essentially a broad guide. As is the nature of qualitative methods, research and data collection may be driven in a diverse path dependent on contextual concerns and the dynamics of the process (Mishler 1986, p117). The chapter finishes by discussing how ethical concerns were tackled and provides an outline of the analytical and dissemination procedures. To recap, this project aims to answer the following questions:

1. Can Lipsky’s SLB conceptual framework offer an effective tool to help understand the exercise of discretion in LAHOSs, principally its negative employment?
2. Can the SLB framework assist in comprehending variation in service delivery, such as the allocation of resources, interpretation of legislation and service user differentiation, with a focus on older people affected by homelessness?
3. With particular reference to older people, in what ways may the current political context, principally relating to welfare reform and austerity measures, impact on LAHOS delivery? What has this meant for established role objectives, such as the requirement to limit statutory homelessness and temporary accommodation use?
4. How do LAHOSs perceive their role in delivering political objectives relating to homelessness? What internal or external constraints do they identify and in what ways can these be overcome or improved?
Finally, it is important to reveal that the researcher has professional experience of statutory homelessness, gained in the public sector and a not for profit setting. This positioning as observer and participant of homelessness policy implementation provided the impetus for this study and inevitably guided the process (Marshall and Rossman 1999, p25). It is recognised that questions may be raised around the credibility of research findings where the investigator has an insider perspective to the topic under study. But at the same time, significant experience in the field being researched can demonstrate the researcher’s competence (Marshall and Rossman, 1999); this topic is returned to throughout the chapter.

**The research focus**

This thesis aims to provide both an insight into service delivery from the perspective of LAHOS practitioners and to make policy suggestions based on those observations. It is however acknowledged that the relationship between research evidence and influence at the policy level is by no means straightforward, synonymous to the policy process itself (Walker 2005). Although it goes beyond the scope of this thesis, accounts of the multilayered and complex relationship between academic research and policy has been covered elsewhere (Weiss and Bucuvalas 1980). Due to its aims of accessing implementation mechanisms this project explores the perspective of housing professionals rather than that of older service users, though investigations which focused on the latter were covered in some detail in the previous chapter. Other reasons for concentrating on those who are involved in policy delivery and as touched upon earlier, is that homelessness legislation has been distinguished as an area clothed in complexity (Ravenhill 2008, pp14-15) and thus service users will not generally possess detailed knowledge of its application (Crisis 2009) and will have limited access to the mechanisms at play (Lipsky 1980, p53). For this reason service users are unlikely to possess a benchmark in which to measure the service they should expect to receive.

**An implementation perspective**

Based on the literature review and as threaded through previous chapters, it is argued that to comprehend the impact of housing policy on older people at threat of homelessness, and the forces that drive LAHOSs to interpret or act upon directives in a particular way, it is necessary to investigate what factors coalesce with its implementation. It has further been demonstrated that Lipsky’s conceptual framework can potentially provide an effective
mechanism to answer the main research questions, albeit with an understanding that no model can offer a perfect fit to all research settings. It has been advocated that presenting the policy process as staged, though an artificial construct, is a useful way to assist in providing a contextual basis and make a complex phenomenon more manageable (Parsons 1995). Moreover, research which attempts to measure policy outcomes by focusing on the lower key actors are likely to uncover more varied and differentiated dynamics (Andrews et al 2012). Respectively, if the action or intentions of Central Government were the sole focus the data collated would likely paint a very different (and arguably inaccurate) picture to that gathered on the frontline.

But equally, peripheral blindness to the upper echelons will distort the ‘fields’ (Smith et al 2011) in which policy is shaped and defined. As highlighted in Chapter Three an analysis of frontline operation is not adequately explained by looking at the individual level alone and must be placed within the ethos of the organisation for which practitioners are employed (Garrow and Grusky 2012). Therefore, although it is recognised that investigations around micro frontline processes are a necessary tool to tackle the main research questions, they are not sufficient (Mason 2006), as essentially these processes make up the macro political operation of national LAHOSs. In other words the importance of the ‘general’ as well as the ‘particular’ is recognised (Evans et al 2011a, p278) and the use of mixed methods aimed to emphasise both (Evans et al 2011a).

**Methods employed in implementation studies**

Many investigations which have employed Lipsky’s SLB framework adopted qualitative techniques such as interviews (Evans 2011, 2010; Sullivan 2009), narrative stories (Durose 2011, 2009; Maynard-Moody and Musheno 2003; Kelly 1994) and ethnographic explorations (Ellis 2007). Others assessed the aggregate of literature in the field (Hupe and Hill 2007; Taylor and Kelly 2006; Evans and Harris 2004). Although most implementation researchers adopted a qualitative approach a few utilised quantitative techniques. Examples include Tummers et al (2012), who developed a systematic analysis which aimed to measure how particular factors may impact upon policy implementation and Nielson (2006), who tested Lipsky’s framework on 174 Danish private companies. In relation to implementation studies which concentrated on LAHOSs, Hawes (1999) identified wide variation in policy dissemination and Rashleigh (2005) uncovered overt abuse of the law from survey data.
Whilst it is accepted that quantitative methods can provide a useful addendum to qualitative research and as is the case with this thesis, set a scene, it is argued that the sole use of this method may impose an artificial or merely descriptive construct (Marshall and Rossman 1999, p57). It further runs counter to earlier arguments that bureaucratic behaviour cannot suitably be understood on an aggregate level due to the individualised and unique way in which each frontline officer may weigh up how to deliver a role. Lipsky (1980, p168) moreover argued that quantitative measurements failed to provide an accurate picture of performance, as statistics were essentially arduous to contextualise and interpret. For example a given LAHOS may show a decrease in homeless acceptances due to mental ill health, yet such data does not tell us the reasons for this. Yet it is maintained that used appropriately quantitative techniques can provide an extra dimension to research aims. For example in respect of this project a baseline survey was adopted as a precursor to the main, qualitative interviews to gather a broad, overall understanding of the current LAHOS environment (this is considered further below).

**Methodological underpinnings**

It is maintained that research should emanate from real world issues and the methods selected should flow from this (Seale 1999). Therefore, as the purpose of this project is to constructively impact upon those whose lives are adversely affected by homelessness, all philosophical positions can potentially exert influence to this effect. That is not to say theoretical underpinnings are inconsequential, but rather, that it should be guided by the research questions that need to be answered. The purpose of this thesis is to ‘elucidate the range of meanings implicit in the everyday practice of housing professionals’ (Jacobs and Manzi 2000, p40). It was viewed that gaining an understanding of delivery in LAHOSs necessitated an outlook which accepted that any meaningful reality is reproduced within the norms and values contained within (and beyond) that sphere, which extended to the research environment (Crotty 2003; Holstein and Gubrium 1995; Mishler 1986). An interpretivist ontology was therefore adopted whereby the actions of individuals employed in LAHOSs were viewed as a social construction (Bretherton et al 2013; Halliday 2002). It is from this standpoint that the author did not aim to ‘control’ participants, but accepted her place within the shared public sphere that was the constructed research process (Crotty 2003; Holstein and Gubrium 1995, p39). Within this sphere and as highlighted in Chapter Three, behaviours were recognised as being formed through a complex mesh of individual interpretation, human
agency, organisational rules, cultural and macro level concerns, albeit to greater or lesser extents.

It has been maintained that a constructionist approach is effective in identifying the development of policy and implementation (Ravenhill 2008, p37), providing an effective tool for measuring who has the influence to both problematise and subsequently dictate the direction that housing policy may take (Jacobs et al 1999, p13). Yet it has been pointed out that constructionism can be viewed as occupying two broad spectrums, one in which wider social structures exist, but can only be effectively explored via the meanings in which actors assign to it. The other underplays the influence of such structures, focusing exclusively on micro discursive practices (Sayer 2000). The methodological outlook adopted for this project can be said to rest within the former end of this continuum; that is, it incorporates meanings but with the overriding acceptance that these are shaped within the structures for which they are embedded. To this end the survey was designed to provide an overall shape to the meso configuration of LAHOSs, which informed the micro, deeper meanings that the qualitative interviews sought.

The apparent breakage between ‘weak’ and ‘strong’ (Sayer 2000) constructionism can become confusing, as arguments aimed at the latter do not generally apply to the former. For example it was highlighted in Chapter Two that any analysis of the policy process must essentially form an appreciation of the power structures that underpin its progress through the various stages from enactment to implementation. Yet constructionism has been criticised for failing to capture the wider processes of power, as it tends to concern itself with the narrow confines of individual interaction (Clapham 2002). However, this does not necessarily apply to ‘weaker’ strands of constructionism and the prominence given to the wider factors which may cause the exercise of negative discretion in LAHOSs in this project is testament to this. A second criticism aimed at constructionism is that although it focuses on micro level processes, it often fails to capture the essence of an individual, instead applying labels based on the normative assumptions of others (Ravenhill 2008, p37). But while it could be argued that labels do not represent realities per se, constructionism identifies that in truth the world operates through the perceptions of actors within it, and arguably the quality of LAHOSs advice is ultimately shaped by this. It is maintained that an interpretivist positioning does not preclude the adoption of quantitative elements, particularly as ‘qualitative thinking’ (Mason
underpins the rationale behind it (for an example of ‘qualitative thinking’ see Wajcman and Martin 2002). A more detailed discussion of each method is now provided.

**Multi strategy research design**
As highlighted above and in Chapter One a multi strategy design was applied, involving a baseline survey, follow on interviews with a selection of LAHOS employees and a group interview with TSO officers; the next few sections discuss each in turn.

*The survey*
The main aim of the survey was to gather a broad impression of current LAHOSs and inform the main, qualitative phase. A Qualtrics software package was utilised to develop an online survey and the questions were based on themes related to the author’s previous professional experience, relevant literature in the field and responses to an initial pilot which was forwarded to a small selection of LAHOS employees. Although it has been suggested that if a topic is timely, salient or perceived as designed for wider benefit it may persuade respondents of the utility of the project and thus enhance participation (Bulmer 2008, p150), the literature and anecdotal accounts indicated that LAHOS departments were especially busy. Therefore to maximise response the survey length and breadth were kept to a minimum and questions were close ended. However, space was given for respondents to make individual comments and a significant minority (around one fifth) did so. Questions around advice or services available to older people were asked alongside those relating to authority type, assessment procedures, service availability, current challenges and interpretation of the Housing Act (the full questionnaire can be found in Appendix One).

The questionnaire was forwarded via an anonymous link in December 2012; although a request for local authority details were included those who wished their identity to remain unknown were asked to confirm completion by emailing the researcher. It was felt that providing the option to anonymise responses was important, particularly as some questions were viewed as sensitive during the pilot stages. The number of authorities initially contacted was 326; it was found that in a few cases LAHOS teams had merged, so only one survey was sent for both, which brought the number down to 319. As the response rate to online questionnaires is notoriously low (Becker et al 2012, p134) and reasons for non response can
relate to a complex array of factors (Groves et al 1992) the decision was made to contact all LAHOSs in England\(^7\) to better ensure a reasonable distribution of authority type.

An internet survey method was chosen, as they are well suited for a defined organisation easily contactable by email (Becker et al 2012, p145). To maximise response the decision was made to gather details of LAHOS Managers/Team Leaders (those who line manage the LAHOS team, referred to as supervisors or senior officers hereafter) and contact them directly, rather than forward the survey to a general LAHOS inbox. Initially the Directgov website was accessed, as it provides a list of all local authorities in England. This was then cross referenced with the Homeless Link website, which provided direct email addresses to LAHOS general enquiries. As Homeless Link did not have email contact details for all authorities those not included were contacted directly and details of the Team Leader/Manager requested.

The decision was made to email each LAHOS individually and refer to the contact by name; though this proved more time consuming than sending a group email it was felt a response would be less likely if the initial communication was assessed as a mass email drop. In cases where someone got back in touch to provide the requested details these were stored; those who asked for further information were provided with brief details of the research objectives. Around 15% of LAHOSs (n = 50) did not initially respond to the email request, this dropped to around 5% following a reminder email; the non responding LAHOSs were telephoned direct to gather the information. In a few cases repeated communication did not uncover a named contact; when this occurred the survey was sent through to the general LAHOS inbox.

The introduction to the survey ensured that respondents were made aware of the researcher’s professional experience in the field as it has been found that perceived similarity may enhance response rate\(^8\) (Groves et al 1992). Similarly, during follow up emails it was stressed that the response had been higher than anticipated and reiterated that a comprehensive report would be provided following completion. This offered a tangible benefit for participation and aimed to fulfil the purpose of convincing respondents that likeminded professionals had recognised the value of the survey, satisfying what Groves et al (1992, p482) referred to as

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\(^7\) It was subsequently discovered that two LAHOSs had not received the survey, but as the cut off date for completion had passed it was too late for them to do so retrospectively. As the number was low as a proportion of all authorities who had received the survey it is viewed as unlikely that this significantly affected the findings overall.

\(^8\) This is stated with the caveat that many potential respondents were unlikely to share the author’s positioning as an academic researcher.

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‘social validation’. Some LAHOSs got in touch to advise that they could not complete the survey due to heavy workload and/or staff shortages but once the importance of the project was stressed, surveys were subsequently completed in most cases. As a suitable number of responses had been received following the second reminder (n = 272) no further prompts were sent.

It is acknowledged that the contextual environment in which practitioners completed the survey and thus produced data is important (Yang 2010, p3). In this case surveys were forwarded to and likely to be completed, at the place of work, which in turn may elicit different responses than if it were finished in a more neutral environment. The researcher was further mindful that a high response rate, though desirable, is not sufficient to prevent total item and case non response (Stoop et al 2010; Yang 2010); the former relates to questions missed out and the latter to those who do not complete the survey. In respect of item non response the final question, which asked whether the Housing Act should be made more explicit in specific areas, had a relatively high item non response rate at eight percent. The researcher was not unduly surprised by this, as the pilot surveys and intuition identified this as a salient issue for two reasons. Firstly, it encouraged respondents to critically assess current housing policy and secondly respondents may have been reluctant to confess to a lack of understanding around particular areas of the Housing Act.

Conversely, of those who did respond to this question nearly three quarters felt at least one area of the Housing Act should be made clearer, which was explored further during qualitative interviews. The Qualtrics software allowed the researcher to view the number of survey’s opened but not completed, this was rather high at 20%. It is impossible to know if non response occurred due to limited time or an unwillingness to answer the questions posed. Further, it cannot be ascertained whether practitioners subsequently opened the survey again and completed it. A full and detailed discussion of the administration of the survey and issues encountered, both foreseen and unforeseen, is contained in Appendix Two.

Profile of respondents
A total of 272 LAHOS professionals responded to the survey, of these 174 (64%) were the senior members of staff originally contacted; the remainder were completed by officers. In a few cases more than one practitioner within a given authority completed the survey; when this occurred identifying information was provided in some instances, but to avoid
duplication and remove potential bias the responses to some questions were weighted to ensure that only the views of one authority was represented (in these cases the first participant from the organisation is retained and the others excluded). A total of 27 responses were weighted due to duplication and a further 27 as the respondent identified themselves as a staff member, but had provided no details regarding the authority they worked for at the end of the survey. Although in some cases the latter respondents may have represented a different LAHOS, the responses were incorporated into the unweighted data to ensure a duplicate authority was not included unintentionally, the aim being to achieve greater precision. Topics where the results from the full 272 respondents are discussed mainly focus on individual attitudes, such as views around housing law and when this occurs it is made explicit.

The weighted responses totalled 218, which accounts for just over two thirds of LAHOSs in England. Although in practice it is not realistic to strive for a 100% response rate, the researcher is nonetheless confident that the survey is representative of LAHOSs because of the high proportion of responses and there was no evidence to suggest that non responding authorities differed from those who completed it. There was an initial concern that only less busy LAHOSs would complete the survey, but based on the challenges reported this did not appear to be the case. For the weighted data there are 160 senior practitioners (73%) and 58 officers (27%), meaning that the former’s responses are overrepresented by nearly three to one; this was expected as senior employees were targeted. Further details regarding specific demographics relating to size and geographic location are discussed in Chapter Five.

Qualitative interviews
Semi structured interviews were adopted as the primary method due to its perceived suitability for exploring the process of policy implementation (Rist 1998, p411) and in light of previous research (discussed above) which successfully adopted it to examine frontline policy delivery in LAHOSs. Individual interviews were further able to draw out the unique views of practitioners and assist in clarifying areas of divergence identified during the survey. Due to the researcher’s previous close relationship to a few of the organisations involved in the study, a diary was kept which noted any perceived issues that arose; this assisted during analysis (see below) and provided an effective reflexive tool. The optimum number of interviews to strive for is a debated subject (Baker and Edwards 2012) but as the survey data highlighted a broad heterogeneity in LAHOSs, a reasonable number needed to be included in the research. This was to ascertain if the mixed patterns of provision identified in the survey
were indicative of internal differences between different types of LAHOS or individual decision makers. However, it is viewed as counterintuitive to rely on other accounts or scholarly advice on the exact number of interviews to be sought. There are so many other factors to consider, such as overall methodology, practicalities, nature of research questions, heterogeneity within sampling frame and so on. It was therefore viewed that the best approach would be to seek interviewees until such time as new themes or concepts reached saturation (see below). It is believed that access to participants was facilitated as a result of the researchers shared frame of reference to the topics under study (Meth and McClymont 2009, p918; Holstein and Gubrium 1995, p16) as this was made explicit in the initial email contact which invited senior officers, alongside frontline staff, for interview.

Based on the results of the baseline survey the LAHOSs approached for interview had a mixture of sizes, geographical location, and other variables which appeared to represent differences in how a given LAHOS may operate a service; however, these were restricted to the North East due to practical issues resulting from a limited research budget. 18 LAHOSs were assessed as residing in the catchment area (that is, based in Northern England and within a reasonable travelling distance) and a representative of each was contacted via email to ask if any employee would be willing to participate in an interview. A total of 27 practitioners in 12 LAHOSs agreed to be interviewed; these were carried out between April and July 2013. As there appeared to be a good mixture of authority types this initial response was assessed as sufficient and the decision was made that reminders would only be sent out to non responding authorities if additional interviews were assessed as beneficial. But it was found that new themes and concepts reached saturation point fairly quickly and further participants were not required.

Of those interviewed one third consisted of line managers and the remainder were frontline practitioners. Nearly half of the interviewees were employed in two authorities (B and I), to gather information on how views and practices may differ endogenously; for the remainder between one and four were interviewed in each. It needs to be iterated that one third of the LAHOSs interviewed either did not complete the survey, or chose to remain anonymous, so the survey to interview responses could not be directly compared; however, as iterated above, comparison was not the aim. In a similar vein although the sample represented a small sub section of LAHOSs in England and therefore cannot be generalised to the whole population of homelessness services, the purpose was to provide a more in-depth analysis that could not
have been achieved if resources had been stretched to incorporate a larger number of authorities.

Due to practical constraints most interviews were held at the employee’s place of work (although two took place in a neutral location at the interviewees’ request). It was recognised that an employment setting may have influenced the particular views expressed, it was further accepted that the role of public sector employee inevitably coexisted with specific familial and social identities, alongside other distinguishing characteristics relating to social class, gender and ethnicity (Estes et al 2001, p23; Holstein and Gubrium 1995, p30). However, alongside the practical issues of attempting to stratify respondents, there is no evidence to suggest individual attributes of decision makers necessarily impinge upon provision (as touched upon in the previous chapter). That is not to say differences do not exist, but rather, as these factors have not been previously identified, introducing them here goes beyond the scope of this project.

The main concepts assessed by Lipsky as indicative of a SLB guided the questions asked, but a number of issues unique to LAHOSs, informed by the survey data and literature review, were also addressed (a copy of the interview guide for frontline and senior staff respectively can be found in Appendices Three and Four). The aim was to ensure that a wide range of factors which could potentially influence service delivery were considered (Evans et al 2011a, p289) and to avoid ‘fitting’ responses to the SLB framework. The interviews followed a semi structured format, as it is believed that to educe good quality information it is necessary to work with the knowledge flow of the respondent. Thus practitioners were given the opportunity to account for the issues that they viewed as being of particular significance (Mason 2002, p65). This meant that the interview flow was essentially different for each participant, concentrating on particular lines of enquiry, but in nearly all cases the discussions broadly followed the themes devised at the outset.

It was further felt that a deeper command of the topic under investigation ensured the information gained from the interview experience was enhanced (Marshall and Rossman 1999). For example a shared vocabulary aided comprehension and ensured answers were not inhibited by linguistic or jargoned distance (Knapik 2006). That said some topics, particularly sensitive areas relating to unlawful decision making, were explored in far greater detail with some interviewees than others. This returns to a concern highlighted in Chapter Three that
LAHOS practitioners may be unwilling to disclose information indicative of policy contravention (Rashleigh 2005). Yet due to this project’s principle aim of assessing the quality of LAHOSs an exploration of sensitive issues, such as those relating to unlawful gatekeeping or problems with legal interpretation, was necessary. Therefore securing the cooperation of respondents was paramount to ensure interviews elicited meaningful information; correspondingly at times it was crucial to probe interviewees who appeared reluctant to discuss particular issues.

It was assessed that the most effective way to increase the likelihood of truthful accounts being provided would be to develop a sound relationship with interviewees (Marshall and Rossman 1999), thus enhancing the trustworthiness of ‘data’ obtained (Arksey and Knight 1999, p104) (though as will be shown in Chapter’s Six and Seven, divergent accounts within LAHOSs can be illuminating in themselves). In respect of this latter suggestion, while in a few cases practitioners appeared unwilling to discuss areas of divergence in respect of their managers or colleagues, it was found that a perceived empathic relationship based on a shared professional frame of reference assisted with the process. This rapport existed regardless of whether the researcher had previously met the respondent (the analyst had a former professional relationship with one third of those interviewed). However, whilst most interviewees opened up after initial probing, on two occasions it was clear that continuing with a particular line of inquiry would potentially disrupt the interview flow. Where this was the case the discussion was steered toward other, relevant topic areas.

Profile of interview respondents
Table 4.1 provides an overview of each responding LAHOS, with basic information relating to size and geographic area, service provision in respect of older people and requirement of priority need for the provision of private rented schemes. It further records whether LAHOSs had scarce or plentiful resources in respect of private and social rented accommodation and if prevention or statutory acceptances had increased in recent years. To protect the identity of the LAHOSs who took part the type of authority (i.e. metropolitan, unitary) has not been added to the table below, but it included one unitary authority, one district, two metropolitan districts, four boroughs and four metropolitan boroughs. The survey findings did not suggest any unique differences between authority type (where these details were available) and it was found that other issues, such as size, rurality, or accommodation availability had a far greater impact on service provision. All authorities operated front desk screening services.
Table 4.1: Profile of Local Authorities

<table>
<thead>
<tr>
<th>LOCAL AUTHORITY</th>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
<th>F</th>
<th>G</th>
<th>H</th>
<th>I</th>
<th>J</th>
<th>K</th>
<th>L</th>
</tr>
</thead>
<tbody>
<tr>
<td>Size(^1)</td>
<td>XL</td>
<td>L</td>
<td>M</td>
<td>M</td>
<td>M</td>
<td>S</td>
<td>M</td>
<td>S</td>
<td>M</td>
<td>L</td>
<td>M</td>
<td>M</td>
</tr>
<tr>
<td>Geographical area(^2)</td>
<td>URB</td>
<td>MIX</td>
<td>MIX</td>
<td>URB</td>
<td>RUR</td>
<td>URB</td>
<td>MIX</td>
<td>MIX</td>
<td>URB</td>
<td>URB</td>
<td>URB</td>
<td></td>
</tr>
<tr>
<td>Services specifically for older people</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Priority need required rent in advance(^3)</td>
<td>N/A</td>
<td>NO</td>
<td>YES</td>
<td>N/A</td>
<td>YES</td>
<td>SCL</td>
<td>SCL</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Priority need required rent bond</td>
<td>YES</td>
<td>NO</td>
<td>YES</td>
<td>SCL</td>
<td>YES</td>
<td>SCL</td>
<td>SCL</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Decision maker(^4)</td>
<td>MAN</td>
<td>OFF</td>
<td>MAN</td>
<td>OFF</td>
<td>BTH</td>
<td>OFF</td>
<td>OFF</td>
<td>OFF</td>
<td>OFF</td>
<td>OFF</td>
<td>OFF</td>
<td></td>
</tr>
<tr>
<td>Availability of private rented(^5)</td>
<td>PFO</td>
<td>SCE</td>
<td>SCE</td>
<td>PALL</td>
<td>PFO</td>
<td>SCE</td>
<td>SCE</td>
<td>SCE</td>
<td>PALL</td>
<td>SCE</td>
<td>DOA</td>
<td>PFO</td>
</tr>
<tr>
<td>Availability of social housing(^6)</td>
<td>SCE</td>
<td>SCE</td>
<td>SCE</td>
<td>PFO</td>
<td>SCE</td>
<td>SCE</td>
<td>SCE</td>
<td>SCE</td>
<td>PALL</td>
<td>PFO</td>
<td>PFO</td>
<td>PFO</td>
</tr>
<tr>
<td>Homelessness acceptances(^6)</td>
<td>URE</td>
<td>INC</td>
<td>RED</td>
<td>SME</td>
<td>INC</td>
<td>SME</td>
<td>SME</td>
<td>SME</td>
<td>INC</td>
<td>INC</td>
<td>SME</td>
<td>INC</td>
</tr>
<tr>
<td>Homelessness preventions(^6)</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
<td>SME</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
<td>INC</td>
</tr>
</tbody>
</table>

*Notes
1 extra large (XL), large (L), medium (M), small (S)
2 urban (URB), rural (RUR), mixed (MIX)
3 not applicable (N/A), only offered to non priority households in ‘special’ circumstances (SCL)
4 manager (MAN), officer (OFF), both (BTH)
5 scarce (SCE), plentiful all (PALL), plentiful families only (PFO), depends on area (DOA)
6 increased (INC), reduced (RED), same (SME), unsure (URE)

Very large and rural LAHOSs were slightly underrepresented based on the survey mix, whereby small, medium, and large alongside urban and mixed authorities broadly reflected the survey demographics. Of the LAHOSs interviewed all bar one stated that there had been an increase in demand for homelessness prevention services, whereas just under half reported a rise in statutory homelessness acceptances, which is lower than that reported in the survey. On the other hand the LAHOSs interviewed overrepresented officers who made all statutory homeless decisions, as three quarters did so compared to 40% of survey respondents. It was found that the LAHOSs interviewed were slightly more likely to report a shortage of private and social rented accommodation, and the probability of offering rent in advance to a non priority need household was slightly higher; eligibility for this group in respect of the rent
bond was broadly congruent. In respect of rent in advance, the disparity may have been in large part attributable to the fact that nearly a quarter of survey respondents did not offer this service, compared to one sixth of authorities interviewed.

For the purpose of confidentiality alphanumeric codes are used when interviewee quotes are cited. Each participating LAHOS was assigned a letter and the interviewees a number; thus quotations are referenced as, Officer/Manager/Senior Manager, followed by the corresponding number (i.e. One, Two, Three), and letter representing the authority for which they are employed. All quotes relating to practitioners are referred to as ‘Officer’ and senior or supervisory staff as ‘Manager’. Two interviewees are described as ‘Senior Manager’ due to their detachment from the day to day operation of frontline services and main task of overseeing frontline supervisors alongside fiscal and direct policy related matters.

Only around 10 percent of surveyed LAHOSs reported a good level of specialised facilities for older people, when those who reported some level of service, but assessed it as inadequate were included, this rose to around 40 percent. Of survey respondents who reported any level of service six resided in the catchment area (although half the LAHOSs in the catchment area had either anonymised or did not complete the survey) and of these, four agreed to be interviewed. As can be seen in Table 4.1 above, only one authority in fact recalled any external or internal services tailored exclusively to older people (and this particular LAHOS had reported in the survey that none was available). The fact that specialised services for older people were less representative than the survey results was due to two specific reasons. Firstly, of the four representatives who reported services for older people within their authority in the survey, the practitioners subsequently interviewed from the same LAHOSs could not identify any. In respect of one of these, a specialist adviser was due to be recruited but this was still pending. Secondly, the remaining LAHOSs in the survey who had reported some level of specialised service did not respond to an interview request. Despite the interview responses, on further exploration it was found that some of the participating LAHOSs had specialised facilities that may have proved beneficial to older people at threat of homelessness, but interviewees appeared unaware of them; this will be considered further in Chapter Seven when specialisation of function is discussed.

Alongside the main LAHOS employees a group interview was undertaken with a small number of TSO representatives (n = three) to discuss the more common areas in which
households sought assistance. The respondents were contacted and recruited via email and the group interview took place in July 2013. The three TSO representatives who participated in the group interview provided legal advice and assistance to around 13 local authority areas (which included a quarter of the responding authorities in the interview sample). Although small in number, the TSO professionals offered advice to service users in a large geographic area, and while can be in no way be viewed as representative of all similar TSO’s, were chosen to stimulate discussion from their particular perspective and offer an alternative view to the main statutory interview data (the interview guide in respect of the TSO participants in provided in Appendix Five).

**Ethical scrutiny**
The main concerns identified prior to the fieldwork are provided in this section. Although, as highlighted above, it was accepted that sensitive topics would arise during the course of the investigation, in line with Diener and Crandell’s (1978) taxonomy of ethical issues relating to harm, lack of informed consent, invasion of privacy and deception, no specific problems were foreseen. It was further assessed that potential ethical dilemmas due to imbalanced power structures between the researcher and researched (Kvale and Brinkmann 2009, p76; Knapik 2006) was to a large extent eliminated as all participants held positions equal or greater than that of the researcher.

An additional consideration related to the competency of respondents (Holstein and Gubrium 1995), but as participants were professionals in the field for which information was sought, this was not viewed to be an issue. However, participants were encouraged to request clarification if it was required and a few interviewees did so. In most cases this related to more recent political issues such as the Big Society, whereby a small number were unsure what it was despite the term being familiar to them. Prior to conducting interviews respondents were also advised of the right to freedom of speech and anonymity and given the opportunity to opt out or request that disclosures be withheld from any final reports or published work (Bulmer 2008, p150). Debriefing took place after all contact and respondents were given the opportunity to raise any concerns. It was recognised that ethical considerations need to be maintained throughout the research, from inception through to dissemination (Kvale and Brinkman 2009) and both survey and interview participants were advised they could contact the researcher at a later date if they had any questions regarding
progress of the project. Confidentiality in accordance to the Data Protection Act 1998 has been adhered to and the dissemination of data has minimised the risk of harm by ensuring that the identity of the employees and their workplace remained strictly confidential. A copy of the informed consent sheet provided to LAHOS interviewees is provided in Appendix Six and. Confirmation of ethical approval, awarded by the Department of Sociological Studies Ethics Review, can be found in Appendix Seven.

**Analysis strategy**

While the analysis strategy has been touched upon, this section considers areas which have not previously been discussed and returns to the researcher’s positioning. The survey responses were inputted and analysed with the assistance of SPSS, as stated above the data derived from this initial stage was descriptive in nature and informed the second, qualitative phase. In respect of the interviews analytic codes were created inductively with the assistance of Nvivo software. But with regard to the latter point, the resulting codes were inevitably influenced by the factors present in the SLB model, as the questions were at least in part derived from Lipsky’s conceptual framework. This was not assessed as a concern as the perspective was consciously employed at the outset and utilising its main variables did not preclude an identification of potential challenges to the framework (this is covered further in Chapter Eight).

In his operationalisation of the interview as a discursive practice Mishler (1986) referred to coding as a coherent way of formulating a complex set of values, meanings and beliefs, but warned that this may misrepresent data and lead to coding errors. For example Yarrow and Waxler (1979, cited by Mishler 1986, pp4-5) pointed out that codes are created in a neutral environment, yet the themes and concepts are formulated in a contextual milieu, as is the case with this research. Thus Mishler (1986) warned that the meanings attached to questions and subsequent responses are complex and standardised coding may artificially regulate this. As has been a recurrent strand throughout this chapter, it is implicitly understood that the research process is not accomplished in a vacuum and the interviewer essentially impinges on the process (Marshall and Rossman 1999, p79). In light of Mishler’s (1986) note of caution transcription was undertaken by the researcher. This increased the likelihood of the original meaning remaining intact due to the in-depth relationship between interviewer and derived data (Mishler 1986). It further aided recall of the contextual environment (Kvale and
Brinkmann 2009, p180). For example, during transcription specific discussions were recalled via audio cues where topics or questions elicited responses such as anger, sadness, or indicated a reluctance to converse in particular topic areas.

**The researcher’s positioning**

As highlighted earlier, the research questions devised for the purposes of this thesis were originally conceived during the author’s experience as a LAHOS and TSO professional. As highlighted above it is recognised that the researcher may come under a charge of potential bias due to her professional experience in the field under study. To offset such an allegation of partiality this chapter has attempted to show that an in depth knowledge of the field proved an asset and assisted comprehension of the topic and data derived from it (Marshall and Rossman 1999, p194). Furthermore, it was felt that a shared frame of reference encouraged interviewees to disclose salient issues that may not otherwise have been extracted (Holstein and Gubrium 1995), as touched upon earlier.

An in-depth and specialised knowledge of the field further ensured the interviewer felt confident when probing sensitive issues. The use of a research diary proved helpful in the early stages, as the analyst was able to reflect upon her status as researcher and former LAHOS worker. Due to the latter positioning it was found that in a few cases interviewees would attempt to evoke a response when referring to specific problems being experienced, such as the impact of resource scarcity, for example. While an empathic approach was adopted, care was taken not to provide a point of view, but rather, listen to the issues being discussed. On a few occasions this proved to be difficult, but due to an awareness of the importance of ensuring that expressed values or beliefs belonged to that of the interviewee, opinions were not provided. However, encouragement was offered to ensure interviewees felt free to discuss any topic, as highlighted above. Finally, in most cases it was found, contrary to expectation, that the LAHOS officers known to the interviewer through professional channels appeared to change from an informal to a more ‘specialist practitioner’ demeanour once the interviews commenced. Thus initial concerns around how a former professional relationship would impact upon the interview environment for the most part proved unfounded. In summary this thesis follows Lucchini (1996, p169) who argued that ‘Without a deep experience of the field even the best methods are nothing’.
Conclusion
This chapter has summarised the main research focus, methodological underpinnings and provided a detailed examination of each method adopted. Alongside this the approach employed to recruit participants, the research design and précis of the ethical concerns and analysis strategy has been provided. A theme threaded through this chapter has been the positioning of the researcher. In summary, it is maintained that an in-depth understanding of the subject under investigation, if the methods chosen are employed rigorously, strengthens the data derived. The next three chapters discuss the survey and interview findings respectively.
CHAPTER FIVE

Survey of Local Authority Housing Option Services

Introduction
This chapter discusses the main survey findings, beginning with an exploration of the demographic characteristics of participating LAHOSs. It then considers responses to questions relating to assessed challenges, service delivery procedures, prevention initiatives, main decision makers, relationship to TSO’s and views around the Housing Act. It finishes with an assessment of available services and determination of vulnerability in respect of older service users. As highlighted in Chapter Four the questions were based on a mix of Lipsky’s SLB conceptual framework, general literature around LAHOS provision and the researcher’s professional experience; it was further refined following feedback gathered during the pilot stages.

As noted previously the main objective of the survey was not to test if Lipsky’s SLB framework could be applied to LAHOSs but rather, to gather an overview of current service provision, which was then explored qualitatively. Although attempts were made to build multiple regression and factor analysis statistical models to aid dissemination, this proved ineffective. Therefore only descriptive details and tests of association/correlation are reported. This inability to ‘fit’ the data into a statistical model is likely to reflect the broad differences in service delivery that existed between similar types of LAHOSs and the high number of challenges reported by nearly all authorities.

Main local authority types
The main demographical information relating to each authority is illustrated in Tables 5.1 and 5.2; these refer to the weighted data to avoid duplication of LAHOS type (the numbers do not add up to 218 as in a few cases identifying information was not provided):
Table 5.1: Size of authority

<table>
<thead>
<tr>
<th>Size</th>
<th>Number of respondents</th>
<th>Percentage total responses*</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5 employees</td>
<td>39</td>
<td>18</td>
</tr>
<tr>
<td>6-10 employees</td>
<td>90</td>
<td>42</td>
</tr>
<tr>
<td>11-20 employees</td>
<td>49</td>
<td>23</td>
</tr>
<tr>
<td>Over 20 employees</td>
<td>36</td>
<td>17</td>
</tr>
</tbody>
</table>

*Percentages are rounded and refer to weighted respondents

Table 5.2: Geographical area type

<table>
<thead>
<tr>
<th>Area</th>
<th>Number of respondents</th>
<th>Percentage total responses*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural</td>
<td>35</td>
<td>16</td>
</tr>
<tr>
<td>Urban</td>
<td>79</td>
<td>37</td>
</tr>
<tr>
<td>Mixed</td>
<td>100</td>
<td>47</td>
</tr>
</tbody>
</table>

*Percentages are rounded and refer to weighted respondents

As can be seen in Table 5.1 the most common number of employees was 6-10, totalling nearly half of all responding LAHOSs. However, there was no accurate way of measuring whether employee composition corresponded to the national average as there was no data available to check this. In a similar vein although the Defra (2011) provide a classification of six main types of rural/urban area splits (major urban, large urban, other urban, significant rural, rural-50 (50-80%), and rural-80 (80% plus rural)), this was not used. Based on feedback provided during the pilot stage it was felt that respondents may struggle to accurately place their respective LAHOS, so for reasons of simplicity three broad categories, rural, urban and mixed, were adopted. Nearly half of the LAHOSs described themselves as mixed (that is, covering both rural and urban areas). Less than one fifth identified their authority as covering primarily rural areas, but as with size, this lower number may reflect the composition of LAHOSs in England.

It was found that an authority’s geographical base was related to its size whereby nearly half of respondents who worked for a primarily rural authority had five members of staff or less, compared to less than four percent of urban authorities. On the other side of the coin only five percent of rural LAHOS had 20 or more employees compared with just under a third of urban authorities. Despite the lack of official comparative data, based on the percentage of total LAHOSs who completed the survey it is viewed that there are sufficient numbers of both...
authority size and geographic remit to be reasonably confident that all main types were sufficiently represented, and thus robust for analytic purposes.

Main findings

Challenges faced in the current political environment

The survey results supported findings discussed in previous chapters that statutory homelessness acceptances are increasing, with three fifths of LAHOSs stating they had risen in their area; just under a third reported that it had remained the same and nine percent a reduction. It must be borne in mind that this question refers to ‘statutory’ acceptances, whereby a full homeless duty is owed and not the total numbers who seek housing advice (this is explored further below). The vast majority of respondents believed that the current national political environment, particularly relating to fiscal cuts, was having a negative impact on service delivery. When asked to consider the current challenges faced the most commonly reported was reduction to LHA levels, mentioned by nine out of 10 respondents. This was closely followed by welfare reform/general effects of the downturn and lack of private rented accommodation, which were both reported by over 80%. Table 5.3 lists the total percentages cited by all respondents relating to each challenge discussed in the survey.

Table 5.3: Current challenges facing services

<table>
<thead>
<tr>
<th>Current Challenges</th>
<th>Yes</th>
<th>No</th>
<th>Percentage total yes responses*</th>
</tr>
</thead>
<tbody>
<tr>
<td>LHA reform</td>
<td>244</td>
<td>28</td>
<td>90</td>
</tr>
<tr>
<td>Lack of suitable private rented accommodation</td>
<td>231</td>
<td>41</td>
<td>85</td>
</tr>
<tr>
<td>Lack of social housing</td>
<td>224</td>
<td>48</td>
<td>82</td>
</tr>
<tr>
<td>Welfare reform/general downturn</td>
<td>222</td>
<td>50</td>
<td>82</td>
</tr>
<tr>
<td>Lack of hostel/supported accommodation</td>
<td>138</td>
<td>134</td>
<td>51</td>
</tr>
<tr>
<td>Departmental budget decrease</td>
<td>125</td>
<td>147</td>
<td>46</td>
</tr>
<tr>
<td>Rise in mortgage repossession</td>
<td>110</td>
<td>162</td>
<td>40</td>
</tr>
<tr>
<td>Rise is statutory homeless acceptances</td>
<td>59</td>
<td>183</td>
<td>33</td>
</tr>
<tr>
<td>Job insecurity</td>
<td>70</td>
<td>202</td>
<td>26</td>
</tr>
</tbody>
</table>

* Percentages are rounded, refers to unweighted data

Nearly half of respondents felt the ability to undertake the role was adversely affected by a heavy workload (see below), with the same proportion referring to pressures as a result of departmental budgetary decreases. These findings supported research discussed in Chapter
Three which linked resource shortages and workload issues to the perceived ability of a LAHOS practitioner to undertake the main role effectively. This trend is particularly worrying in light of earlier reports that households affected by homelessness is increasing, with no evidence to suggest the tide will turn any time in the near future (this is returned to in Chapter Eight). It was found that respondents who were struggling to meet organisational targets due to a heavy workload cited slightly more challenges (M = 5.82), than those who were not (M = 4.9), t (216), 3.834, p < .005, Levene p .846 (Field 2009).

Although significance was not reached LAHOSs with increased acceptances were also more likely to report that budget cuts were affecting service provision (66%), than those who had not (54%). This pattern existed in terms of availability of services, whereby LAHOSs who had experienced a rise in acceptances were more likely to report challenges due to lack of availability of various types of accommodation. For example for those who referred to a lack of private rented accommodation 63% had also reported an increase in acceptances, compared to 53% of those who did not. The corresponding figures for lack of hostel accommodation was 65% and 55% respectively and increased mortgage repossessions 64% and 57% respectively, but there was no real difference in respect of social housing. Further, those who had experienced an increase in acceptances were more likely to report the use of unacceptable temporary accommodation (61%), than those who did not (49%). However, this was expected as an increase in accepted homeless households will inevitably give rise to the need for temporary accommodation.

Yet whilst differences (albeit relatively small) appeared to exist, the number of challenges reported was high regardless of whether statutory acceptances had increased. For example, over half of LAHOSs where acceptances had reduced or remained the same were struggling to provide adequate assistance to all who approached services and further, were being forced to use unacceptable temporary accommodation. Moreover, those who cited five or more challenges were only slightly more likely to work for an authority where statutory presentations had increased (76%), than those where they had reduced (74%). Finally, LAHOSs whose statutory acceptances had reduced were slightly more likely to report that they were experiencing increased pressure on their workload, than those who had witnessed an increase (58% and 54% respectively). The fact that a high level of challenges was recounted regardless of whether respondents had experienced an increase in statutory acceptances is likely to reflect the preventative political climate that has been in existence for
the last decade or so, as highlighted in Chapter Two. That is, it is indicative of an increase in households seeking housing advice, but who are not necessarily owed a full housing duty. Therefore even in cases where statutory acceptances had not increased, pressures relating to the rising number of households ‘threatened’ with homelessness was likely to be generating higher workload levels.

All practitioners who reported challenges to the service were asked in what ways these impacted upon their ability to effectively undertake the role. Over half felt unable to give appropriate advice and assistance to all who required it and a similar number reported that unacceptable alternatives may be offered to some service users. Staff members were more likely to view that workload impacted on their ability to undertake the role than managers (47% compared to 37% respectively). All bar one respondent named at least one challenge to service delivery, and 99% cited two or more. Just over 70% of respondents reported five or more challenges, which is a strong indication that LAHOSs are under considerable pressure in the current climate (Figure 5.1).

Figure 5.1: Number of challenges viewed as impeding effective service delivery

![Chart showing number of challenges](image)

*refers to unweighted data

**Number of challenges by authority type**

When a binary variable was created to represent LAHOSs where statutory acceptances had, or had not increased, splitting authorities into rural or non rural, it was found that area was significantly related to level of acceptances ($\chi^2$ (2, n = 209) = 8, p = .018, 2 tailed). Only 39% of rural authorities indicated that homelessness in their area had risen compared to 62% of
urban and 65% of mixed authorities. As expected (due to the fact that rural authorities tend to have less employees), small LAHOSs were less likely to report an increase (46%), than authorities with 6-10 (61%), or 11-20 employees (where 67% reported a rise), although this did not reach statistical significance.

It was further found that rural authorities were less likely to name five or more challenges (49%), than urban (71%) or mixed LAHOSs (77%) (Although five was still the most frequently cited number for respondents from rural authorities). A one way ANOVA showed a positive relationship between the area an authority covered and the likelihood of perceiving challenges to the service $F(2, 211) = 4.3, p = .0.15$. Post hoc comparisons with Tukey HSD test indicated that the mean score for rural authorities ($M = 4.5$) was significantly different from urban ($M = 5.4$) and mixed authorities ($M = 5.4$), Levene $1.166 (2, 211), p = .314$ (Field 2009). Both urban and mixed LAHOSs reported, on average, one extra challenge, which may be due to the fact that rural authorities were less likely to state an increase in statutory acceptances. However, as indicated above, it was found that overall experiencing a rise in statutory acceptances was not necessarily a reliable indicator of the level of challenges faced by LAHOSs. Furthermore, though a significant result was found, it is important to reiterate that the average number of challenges identified by rural authorities was still high.

Procedure followed when a service user first approaches

The survey asked what procedures were in place to assist service users who approached for advice, both for those at threat of and literally homeless. The questions distinguished between vulnerable and non vulnerable households and were concerned with the assistance provided when a service user initially approached, rather than what was offered to existing users. The responses showed that over 99% of LAHOSs had some form of front desk/housing options service. Larger LAHOSs were more likely to initially offer option only services (82%) than smaller authorities (72%), and were twice as likely to operate a front desk service (69% compared to one third of small LAHOSs). The fact that larger authorities are far more likely

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9 Correspondingly, although statistical tests found no significant difference between size of authority and number of challenges stated, LAHOSs with five employees or less were the least likely to report five or more, at 59%. This rose to three quarters for LAHOSs with 20 or more employees; the corresponding figures in respect of 6-10 employees was 73%, and 69% for 11-20 employees.

10 One respondent stated they gave a homeless application in the first instance to all categories of service user. Although the researcher cannot be certain, this was likely to have been an input area, as it is expected that prevention services, even if to a limited extent, would be available in all LAHOSs. However, the researcher could not be certain of this, so the data was retained; as it only reflected one case it did not unduly affect the overall results.
to offer front desk services may be indicative of increased resource levels due to dealing with a higher volume of service users, thus making an extra layer of provision financially viable.

While there was no uniformity in terms of how statutory services were delivered it was found that only a very small number of LAHOSs offered a homeless application to service users in the first instance. Furthermore, in many cases this was dependent on whether the household was assessed as being in priority need. For example of the 50% of LAHOSs who operated front desk services, 36% stated that if a person threatened with homelessness was viewed as non priority they would not be offered an interview (housing options or statutory) on initial visit; this reduced to 14% for households assessed as vulnerable. In respect of households who presented as literally homeless this reduced to 28% for non priority groups, compared to 12% of those assessed as vulnerable. In other words, a significant minority of households who met the criteria of homelessness as per the Housing Act were not offered an options interview, let alone a homeless application. In respect of the latter less than two percent of all LAHOSs confirmed they would offer a statutory application in the first instance to a service user at threat of homelessness, this was regardless of perceived priority.

Regarding households with nowhere to go that night, of those assessed as non vulnerable only 6.5% of respondents reported that they would offer a homeless application in the first instance, the corresponding figure for those with priority was still less than a quarter (22%). Although these low numbers do not necessarily imply that applications are being impeded and may reflect political objectives which focus on prevention, it inevitably gives rise to questions concerning gatekeeping practices, as highlighted in Chapter Three. These findings need to moreover be assessed in light of the political climate outlined in earlier chapters whereby statutory acceptances have been discouraged for over a decade. This is not to suggest that exploring prevention options is not potentially an acceptable alternative to a statutory application. However, these low figures suggest that in at least some cases LAHOSs may not be advising service users of their legal right to make a homeless application. At this stage these issues could only be speculated upon, but were explored during the qualitative interviews.

**Prevention services**
LAHOSs were asked what prevention services were provided and to give details of who could apply. Availability was mixed and some schemes were more widely offered than
others, equally, some LAHOSs applied stricter qualifying criteria. Table 5.4 lists the prevention schemes identified by the survey and the percentage of LAHOSs who offered each. Due to the differing initiatives that may be available within authorities this is not an exhaustive list, but covers the main schemes uncovered via council websites, the literature and following discussions with selected LAHOS representatives. The figures refer to percentages of respondents who offered the respective service.

Table 5.4: Prevention schemes offered by LAHOSs*

<table>
<thead>
<tr>
<th>Scheme</th>
<th>Percentage who offer service</th>
<th>Percentage who do not offer service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent bond scheme</td>
<td>94</td>
<td>6</td>
</tr>
<tr>
<td>Rent in advance</td>
<td>78</td>
<td>22</td>
</tr>
<tr>
<td>Government Mortgage rescue</td>
<td>99.5</td>
<td>0.5</td>
</tr>
<tr>
<td>Local Mortgage rescue</td>
<td>53</td>
<td>47</td>
</tr>
<tr>
<td>Welfare/debt advice</td>
<td>90</td>
<td>10</td>
</tr>
<tr>
<td>Mediation services</td>
<td>70</td>
<td>30</td>
</tr>
<tr>
<td>Home visits</td>
<td>88</td>
<td>12</td>
</tr>
<tr>
<td>Local hostel referral</td>
<td>85</td>
<td>15</td>
</tr>
<tr>
<td>Out of area hostel referral</td>
<td>76</td>
<td>24</td>
</tr>
</tbody>
</table>

*figures are from weighted data, percentages are rounded

It was found that delivery of prevention services did not only vary by type, but also with respect to eligibility and decision maker. The next section focuses on the findings related to private rented schemes. This is following recent research, discussed in Chapters One through to Three, that this tenure is increasingly becoming the only viable housing option for many households. However, findings in respect of the Government Mortgage Rescue Scheme demonstrated where divergence can occur during delivery of national programmes which operate a relatively uniform eligibility criterion, thus questioning the effectiveness of training in respect of implementation of specific schemes. For example at the time of survey completion, Central Government stated that households who applied for the scheme required a priority need status to be eligible (Gov.uk 2013), but a third of respondents advised that this criterion was not applied in their authority. This finding points to an unlawful (albeit favourable) use of discretion. Although some disparities may have related to responses from

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11 On a related note the Government Mortgage rescue scheme has been viewed to have been, for the large part, unsuccessful. A report by the National Audit office (2011 pp 5, 20-21) found that since its inception it has helped less than half of the intended recipients, at around three times the predicted cost.
practitioners who did not make decisions in this area, so were thus unfamiliar with the rules, this is unlikely to account for all discrepancies.

*Private rented schemes*

Not all LAHOSs offered private rented services, in some cases the rent bond, rent in advance, or both were available, but service users generally needed to meet minimum eligibility criteria. For example while the majority of LAHOSs (94%) offered a rent bond scheme of these 95% stated that a service user would need to satisfy particular conditions. In just under half of cases applicants would only be eligible if they reached the threshold of priority need; just under one fifth required a local connection in addition to this and one fifth stipulated that an applicant must appear to meet the test of local connection, priority need and be non intentionally homelessness.

Local connection was the most important attribute, being required as a minimum by nine out of 10 authorities. Rent in advance in many cases had stricter criteria, and nearly a quarter of LAHOSs did not offer it as a prevention initiative. This factor in itself will no doubt make it more difficult for an eligible applicant to take advantage of the private rented sector, as many landlords require rent in advance as well as a bond (although landlords may not accept a bond guarantee in any case, as highlighted in Chapter Two). Of the LAHOSs who provided rent in advance 97% stated that a minimum criterion was required to be eligible for a payment. Further, around two thirds reported that applicants must be assessed as vulnerable and 82% referred to local connection as a minimum requirement. Over half of LAHOSs stated that more than one eligibility criteria must be met to be able to claim rent in advance.

In respect of LAHOSs who had experienced an increase in statutory acceptances, over half required priority need for someone to be eligible for a rent bond, compared to 39% of those who had not. This pattern was also present in respect of rent in advance, where it was found that 68% of LAHOSs who had witnessed an increase required an applicant to have a priority, compared to 55% of those who did not. These differences may have reflected a need to target resources toward vulnerable groups to bring down statutory acceptances, but alternatively it could merely indicate that LAHOSs who did not experience an increase in statutory acceptances were less stringent with their eligibility criteria. Although the results did not reach statistical significance this was considered during the qualitative phase.
Assuming a given service user meets all other tests (such as local connection, or non intentionality as applicable) a rent bond was available to non priority groups in half of all responding LAHOSs, the corresponding number for rent in advance was only 18% (this was even lower in urban areas). These figures suggest that private rented accommodation is likely to be out of reach for many who have no priority. Moreover, the effects will be compounded for those without local connection, or who are viewed to have made themselves homeless intentionally. The implication of these findings was explored further in the qualitative interviews and is returned to in the concluding chapters.

**Differences by authority type**

Following previous findings (Quilgars and Pleace 2010) it was expected that rural authorities would have lower levels of provision for some of the main prevention schemes. Yet this was not found and if anything, where differences were identified, provision in rural areas was higher. For example it was predicted that rural authorities would be less likely to offer home visits, as some parts of its catchment area may be more difficult to reach, but 97% did so compared to 83% of urban LAHOSs. Furthermore, in terms of the rent bond twice as many urban (10%) than rural authorities (five percent) stated they offered no scheme. A similar pattern was found for rent in advance, whereby nearly three quarters (72%) of rural LAHOSs provided this service, compared to just under two thirds (65%) of urban authorities. Moreover, only two thirds of LAHOS with more than 20 employees offered rent in advance in contrast to 83% of small LAHOSs (those with less than five employees).

Alongside availability it was found that eligibility for prevention schemes was strongly influenced by the size and geographical remit of an authority. For example in respect of the rent bond scheme of those who offered the service less than one third (30%) of rural LAHOSs required an applicant to have a priority, compared to over half of urban authorities (57%) ($\chi^2 (1, n = 101) = 6.5, p = 0.12, 2$ tailed), the equivalent for rent in advance was 46% for rural and 71% in respect of urban LAHOSs ($\chi^2 (1, n = 74) = 4.4, p = .047, 2$ tailed). Although not a significant result a similar pattern was found in respect of local hostel referral (11% of rural authorities requested priority need compared to over a quarter of urban). These results suggest that applicants, particularly those with no priority who reside in an urban area, have less prevention options available to them, both in terms of criteria and a lower likelihood that it will be offered.
Who makes the decisions?
As with previous topics discussed the process of determining homelessness applications differed between authorities and there was no standard procedure in place. In respect of statutory homelessness application two fifths stated that a senior officer approved all decisions; a similar number reported that all assessments were made by the LAHOS officer who took the application (39%). In one fifth of cases officers were responsible for most decisions, but were required to refer complex, or intentional cases to a manager for approval. In a few LAHOSs other systems were in place, such as ‘buddy housing officers’, or decisions were made on a team level (however, these referred to only a handful of cases). This meant that in the majority of LAHOSs frontline officers made most day to day decisions relating to statutory homeless applications. Further, the level of responsibility may have been higher than initial appearances suggested as it was unclear, due to the close ended nature of the survey, how cases were assessed as ‘complex’, and whether frontline officers had the ability to determine which were required to be overseen by a line manager. The dynamics involved in decision making between staff and frontline managers was explored more fully during the qualitative phase and is discussed in later chapters.

It was considered whether delegation of decision making responsibility was related to type of LAHOS. Although there was no difference between rural and urban authorities in terms of whether the officer made ‘all’ decisions (both at 30%, compared to 43% of mixed), it was found that the smaller the authority, the more likely officers were the sole decision maker. For example in LAHOSs with five employees or less, the practitioner was the decision maker half of the time, this decreased as the authority grew in size and the corresponding number for 6-10 and 11-20 employees was around one third, reducing to a quarter for authorities with 20 or more employees.

With regard to determination of entitlement to specific prevention schemes, at first glance it appeared that there was a relationship between officers being given responsibility for decisions and the criterion of priority need. For example in respect of rent in advance an assessed vulnerability was required in 65% of cases, yet whilst overall senior officers decided eligibility less than half (44%) of the time, this rose to 73% for LAHOSs where priority need was a minimum requirement. This pattern was starker in respect of the rent bond where it was found that although a senior only approved one fifth of applications, in 76% of these cases, priority need was a minimum requirement (whereby overall priority was required in less than
half of the LAHOSs who provided rent bonds). This latter finding reached statistical significance ($\chi^2 (1, n = 197) = 18.6, p < .05, 2$ tailed). In contrast management were consulted in less than five percent of assessments relating to provision of services which required no priority need, such as welfare and debt advice, mediation and hostel referrals; in fact only the latter accounted for over three percent that required approval.

Although these findings appear to show that frontline officers were less likely to be given discretion to assess initiatives where vulnerability was a requirement, it may have been due to the fact that initiatives such as private rented schemes require budgetary approval and are thus more closely monitored. This point is supported when the pattern of decision making in respect of home visits, which require no initial financial outlay, is considered. That is, the decision to undertake a home visit was nearly always decided by an officer despite the fact priority need was stated as a minimum requirement for one to be carried out by two fifths of LAHOSs.

**Third sector organisations**

Chapter Two highlighted that, due to funding cuts, TSO’s that assist the homeless are diminishing. Despite this most respondents (over 87%) had a TSO in their area that could potentially assist service users who wished to seek help in the event of dissatisfaction. However, this still meant that over one tenth reported no organisation in the local area which offered legal assistance. Furthermore, the survey could not ascertain whether LAHOSs who reported the existence of legal help organisations had provision in sufficient numbers to assist all who required it. No relationship was found between type of authority and availability of legal help services in the local area. In fact, both urban and rural areas stated that charitable organisations were available in 88% of cases. Issues related to TSO’s were explored further during the qualitative interviews, as space precluded the inclusion of more specific questions on this topic.

**Interpretation of the Housing Act**

As reported in Chapter Four a question which asked whether the Housing Act should be made more explicit in particular areas had a relatively high item non response rate of eight percent. But of those who did respond just under three quarters felt at least one area of the Act would benefit from legislative clarification, suggesting it was a pertinent issue for many. As this question referred to the view of individual practitioners, all 272 responses were initially examined but when correlated to explore relationships with other factors the
weighted data was used. Of those who felt the Act needed to be more explicit two thirds identified three or more policy areas (this represented 50% of the total sample who responded to this question), and 28% of the total sample cited five or more (the overall mean was 4.1). The policy areas that LAHOSs felt needed clarification tended to concern definitions of who should be viewed as reaching the threshold of priority need (73%), rather than the other stages of decision making (eligibility, homelessness, intentionality, and local connection), which was reported by 27%. An area of vulnerability which received one of the highest responses (at 45%) related to assessment of vulnerability due to mental health issues (the corresponding numbers for other priority need areas are highlighted in Figure 5.2). The priority need areas included in the survey concentrated on areas which required interpretation and therefore did not refer to vulnerability due to pregnancy or dependent children. The percentage in respect of 16/17 year olds is high due to confusion as to whether responsibility should lie with homelessness or social service departments.

Figure 5.2: Priority need areas that would benefit from greater legal clarification

![Bar chart showing priority need areas](image)

*Refers to unweighted data, percentages are rounded

*Differences by authority type*

Although geographical area had little impact on the likelihood that a given decision maker would view the Housing Act as lacking in some areas, differences relating to size were found. For instance, very large authorities (over 20 employees) were more likely to view the Act as sufficient (36%), compared to an average of 22% for all other sizes. This variation was also evident when the view of large and small authorities in respect of whether vulnerability due...
to older age should be made more explicit was compared. For example it was found that 18% of large authorities answered yes, compared to just under a third of smaller authorities. However, size did not appear to be the most reliable indicator of attitudes to the Housing Act as it did not rise exponentially. For example LAHOSs with 11-20 employees were the most likely to state that the priority threshold due to older age should be more explicit (35%), and were the least likely to view the Housing Act as adequate (18%).

Assessment of the Housing Act by decision maker

Just under one third of responding managers felt the Housing Act was sufficient (30%) in its current form compared to one fifth of officers (20%). This disparity may be attributable to differences in experience of the role but as it did not reach statistical significance, the results may have been obtained by chance. Officers who responded that they were responsible for most homeless decision making correspondingly reported higher levels of dissatisfaction with interpreting vulnerability. A possible relationship between whether officers felt the Housing Act required clarification and if they made homelessness decisions was therefore explored. An independent t-test found that officers who were responsible for all statutory determinations named nearly twice as many areas of the Housing Act that they felt required greater clarification (M = 4.9) than if senior staff made either all, or determined complex decisions (M = 2.7), t (50) = 3.03, p = .04, 2 tailed. Statistical significance remained when the test was repeated on the unweighted data (which increased the number of officers from 58 to 99). The same test was run in respect of senior staff and no real difference was found, although those who were responsible for making homeless decisions cited slightly more areas than those who did not (M = 3 and M = 2.8 respectively).

Older people: Services and interpretation of vulnerability

Specialised services

As highlighted in Chapters One and Three, older people in housing need have a diverse and often complex set of circumstances. Although both service delivery and assessment of vulnerability in respect of this group differed dependent on the authority, the overall picture showed that targeted provision was patchy and only available in a minority of LAHOSs, which follows previous findings (Pannell and Palmer 2004). For example less than a quarter of LAHOSs offered specialised services to older people (Figure 5.3), and only one in seven
felt there was a good mix of facilities for people over 50 in their area (Figure 5.4); just over half were not aware of any provision. No relationship was found between size or rurality of authority and facilities for the over 50’s, though rural authorities were slightly more likely to offer tailored services (29% versus 26% respectively), but less inclined to agree that there was good provision for older people in their area (12% versus 16% respectively). It was found that LAHOSs who applied a more generous interpretation of the Housing Act and conferred automatic priority on the basis of age were correspondingly more likely to provide tailored prevention services or report that specialised provision was available in the local area (see below).

Figure 5.3: Availability of prevention services targeted toward people over 50*

![Figure 5.3: Availability of prevention services targeted toward people over 50*](image)

*Refers to unweighted data

Figure 5.4: Specialised services targeted to older people by area*

![Figure 5.4: Specialised services targeted to older people by area*](image)

*Refers to unweighted data
Vulnerability due to older age

It was highlighted in the introduction and Chapter Three that researchers generally take over 50 as a cut off point when describing an older person affected by homelessness, as findings indicate that this group are at significantly higher risk of fatality than their housed or younger counterparts. Yet only two LAHOSs automatically granted priority status to someone over 50 and less than a quarter (22%) to a person over 60; around one third agreed that priority would be conferred to a person over 70 without the need to present with an additional vulnerability (Figure 5.5).

Although not reaching statistical significance it was found that rural authorities were less likely to award automatic vulnerability on the basis of age (20%) than urban (37%) or mixed LAHOSs (32%), yet the former were more likely to offer targeted prevention (31%), than urban (26%) or mixed authorities (at 21%). This ran counter to the overall findings which showed that the likelihood of awarding priority on the basis of chronological age increased the probability of other services being available (see below). Although intuitively it may seem rather severe that over two thirds of LAHOSs would not automatically confer vulnerability to an applicant over 70, it must be borne in mind, as pointed out in Chapters One and Three, that LAHOSs are not necessarily acting unlawfully, as long as service users over 60 are ‘considered carefully’.

Figure 5.5: Award of automatic priority need on the basis of age*

*Refers to weighted data
As touched upon above over a quarter (27%) of those who responded to the question relating to the suitableness of the current Housing Act stated that priority need due to older age should be made clearer. Officers who were required to make all homeless decisions were twice as likely to state that vulnerability in this area should be made more explicit (57%), than for officers where managers made either all, or the more complex decisions (26%); a chi square test showed that this reached statistical significance $\chi^2 (1, n = 52) = 5.2$, $p = 0.41$, 2 tailed. The same test was run for senior officers, but no relationship was found.

It must be pointed out that in respect of the weighted results officers who responded to this question represented only 52 cases (as stated above, senior officers represent just under three quarters of total respondents). When the test was run from the unweighted data so all responding officers ($n = 99$) would be included, significance was not reached. Nevertheless, it was still found that over two fifths (42%) of practitioners who approved homelessness applications felt the Act should be clearer on what constitutes vulnerability due to age, compared to 28% of those where the manager made all, or more complex homeless decisions. When a chi square test was run on the unweighted data in respect of managers, there was still no significant difference. These findings suggest that ambiguity around interpretation of vulnerability due to older age is felt by nearly half of officers who were required to make decisions in this area, which is a cause for concern. For example it was shown above that vulnerability may be an important factor when eligibility to specific prevention schemes are assessed, alongside the likelihood of being given the option of completing a legal homeless application (this was considered in greater detail during the qualitative stage).

**How specialist services and vulnerability assessments may interact**

The award of priority need due to older age was positively related to the likelihood that other services would be available for older people (although, as shown above, this pattern was not present in rural authorities). For example just over one third stated that they offered targeted prevention services, compared to less than one fifth (19%) of those who did not award priority on the basis of age alone ($\chi^2 (1, n = 212) = 5.2$, $p = 0.26$, 2 tailed). Finally, 19% (which is still under one fifth) felt there was a good mix of services for older people in their area, compared to just 12% of LAHOSs who did not confer automatic priority on the basis of old age.
Overall, the survey showed that service provision for older people was limited and that age was not normally factored into decisions around priority need. Further, local services that catered for older people were patchy and only viewed sufficient in a minority of cases\textsuperscript{12}. Additionally, in line with findings discussed in Chapter Three and outlined above, housing policy was viewed as lacking clarity in many areas, which may at least partly explain why definition of vulnerability due to older age widely differed. Finally, the pattern of responses suggested that in some areas an older person would potentially receive sufficient levels of assistance in terms of statutory, preventative or advice services, but in others very limited options would be available. This finding was explored further in the qualitative phase and is discussed in later chapters.

\textbf{Conclusion}

The survey showed that delivery of statutory housing option services in England is diverse, but nearly all were experiencing a higher level of challenges, not just relating to housing shortages, but due to an array of social policy changes, such as welfare reform in the context of austerity. The findings indicated that execution of the LAHOS role was influenced by its type and a number of other factors relating to decision maker, budget and scarcity of accommodation. For example though the survey found that all types of authorities were experiencing similar constraints relating to the broader political climate, there were some differences related to the geographic base of a given LAHOS. This no doubt operated alongside specific localised factors that could not be sufficiently determined via an online, close ended survey. It was found that the majority of practitioners were afforded the ability to exercise discretion in terms of statutory homelessness applications and eligibility for prevention schemes. Yet alongside this relative autonomy many respondents identified specific barriers to effective delivery relating to resource levels, role security and comprehension of the Housing Act.

Despite the fact that households can legally present to any authority, nearly all LAHOSs operated local connection criterion to statutory homeless acceptances and prevention schemes, thus service levels will inevitably be attached to this condition. For example older people will be viewed as vulnerable once they reach a particular age in some authorities, but not others. Equally, those same people may find that prevention schemes may or may not be

\textsuperscript{12} It must be stressed that responses to the latter question was based on the practitioners awareness of provision, and therefore may not have reflected actual services in the local area
available, dependent on the threshold of a given LAHOS. Whilst flexibility in terms of operating a service can be desirable, as local authorities may be best placed to assess where resources should be concentrated, this will inevitably mean that some groups miss out primarily as a result of where they live. Ultimately this may determine whether a given service user is accommodated, or destined to become homeless. Whilst specific factors identified as potentially indicative of SLB type activity were undoubtedly present within the survey, its existence could only be inferred at this stage due to the limitations of interpreting close ended data. The next two chapters focus on the qualitative interview findings and are more explicitly linked to Lipsky’s conceptual framework.
CHAPTER SIX

Discussion of Interview Findings: Main Components of the Frontline Role

Introduction
The following chapters employ Lipsky’s SLB conceptual framework to analyse the interview findings (Figure 6.1). This chapter focuses on the main components of the role and the next considers the relationship between LAHOS workers, service users and third sector representatives. Each topic area contextualises LAHOSs within the contemporary political landscape, particularly in respect of recent austerity measures. Although the themes are broken into separate sections to assist with clarity, in practice they overlap and examples of each are therefore threaded throughout both chapters.

Figure 6.1: The Street Level Bureaucrat conceptual framework

Three points need to be stressed at the outset; firstly, as pointed out in Chapter Four, the findings essentially focus on a selection of Lipsky’s concepts, chosen due to their perceived relevance to the main research questions. Secondly, while interviewees did not necessarily
reference older people when discussing specific areas of service delivery (such as gatekeeping) it needs to be acknowledged, following arguments outlined in Chapter Three, that the negative exercise of discretion (with the exception of children leaving the parental home) will generally impact upon service users over 50 to the same extent as younger cohorts. Thirdly, this thesis is primarily interested in an empirical understanding of the policy process in LAHOSs, rather than forming an ‘ideal type’ model. That said, the SLB framework provided a helpful tool in which to analyse the interview data, affording a deeper understanding of the pressures which potentially drive specific interpretations of the role. However, limitations were found and these are considered in Chapter Eight.

**Frontline decision making mechanisms**

*Discretion*

Due to its chief positioning in the SLB framework and interrelationship with other factors, such as rationing, discrimination and gatekeeping, discretionary behaviour should be viewed as underpinning each subject discussed in the following chapters. The first part of this chapter aims to provide a contextual overview of the mechanisms in which discretion, primarily its negative application, take place. All interviewees felt that they, alongside their colleagues, were required to exercise discretion on a day to day basis and its employment was related to individual, intersubjective and higher level causations. In respect of the latter Central Government led objectives, such as targets, or locally felt pressures due to accommodation shortages, were both viewed as impacting on decisions. It was further found that pressure to exercise negative discretion was exacerbated in authorities with scarcer housing options, which follows previous findings (Bowpitt et al 2011; Niner 1989). Concerning discretionary practices attributed to individual practitioners, some (though not all) were linked to peer or higher level concerns. For example it was found that in many cases external pressures were provided as a justification for particular decisions, such as strict decision making to keep statutory homelessness acceptances low. Line managers for the most part appeared to be wedged between higher level and frontline role demands, although concerns attached to the former tended to take precedence.

The sections below examine the use of frontline discretion in LAHOSs, beginning with a contextualisation of the statutory decision making processes of the interviewed authorities.
This is followed by an examination of the ways in which higher level factors coalesced with the likelihood of individual officers exercising illegitimate discretion. When intersubjective or peer factors are discussed it is acknowledged that the influence of colleagues is difficult to ‘unpick’ as decision making styles may have been learnt through various relationships or experiences on a subconscious level.

**Departmental decision making mechanisms**

As highlighted in the previous chapter just under two thirds of survey respondents stated that their LAHOS followed a system in which managers approved either all, or more complex statutory homelessness decisions, but this was the case for only a quarter of officers interviewed. Of the three LAHOSs in which managers oversaw assessments one reported that only ‘less experienced’ officers required approval, whereas for the remaining two all decision making was passed to a supervisor. A practitioner employed in one of the latter authorities stated that as the same manager determined statutory assessments this resulted in uniformity. But the second LAHOS was very large and a number of managers undertook this task, which led to inconsistency:

> Some managers have a lower threshold of priority need than others, every single day in front office we have a different duty manager... I will get the duty manager involved and say this is the information this is what I think what do you think. But tomorrow there will be another duty manager (Officer One, LAHOS A)

In summary it was reported that in respect of priority need the same person may be assessed vulnerable or not, dependent on the day they happened to come in, and which manager subsequently assessed their case.

As will be considered in the concluding chapter, Lipsky suggested that steps be taken to limit the discretionary elements of public sector judgment. Of those who expressed views around divergence in decision making outcomes, or the viability of attaining uniformity, responses were mixed. Some felt convergence was a desirable objective and others that differences within LAHOSs and between individual officers were a natural and acceptable part of the role:

> I think we all sing from the same hymn sheet, yeah, well I think you have to, you know, I am surprised if within a team people are doing things differently, because, you have a team manager surely and that should be kept an eye on (Manager, LAHOS F)
I think that [differing decision making] is healthy, I don’t think we can all sing from the same hymn sheet and if we were I would worry about that (Manager, LAHOS I)

With reference to the latter quote in which the manager accepted and supported variant decision making it was interesting to note the incompatible responses given by other members of the same team:

I think, because we are such a small team we tend to talk about our cases, maybe we feel a bit, well, should we go this way or that way, but I think we are all singing from the same hymn book really (Officer Three, LAHOS I)

It was found that half the employees interviewed in LAHOS I agreed with the manager’s statement, and half with the practitioner’s. This may have related to a reluctance to divulge internal inconsistencies by some officers, or perhaps there was a genuine perceptual difference in how employees believed housing policy was interpreted and/or implemented. The following three sections assess the use of chiefly illegitimate discretion, exploring how central, organisational and individual causations may interact to encourage its employment.

Central and organisational factors
Nearly all interviewees suggested a detachment from the central context of the policy they delivered and many, including managers, seemingly viewing themselves within a linear top down13 reality with little opportunity to influence outcomes. Many expressed what could perhaps be described as a fatalist outlook; policy happened to them, and there was nothing they could do to prevent whichever trajectory the Government chose to pursue:

Top-down, and I think that ain’t going to change, it’s all well and good having consultations [around] welfare reform... I guess to say, this is how it works, this is what is happening, tough...you knew what was going to happen and there was never anything local authorities could say that was going to change it ... on the team level, we can make suggestions that change things for our particular team, it isn’t going to change things in the organisation, it just isn’t the way it happens (Officer Six, LAHOS B)

Further, one manager advised that despite politicians’ limited comprehension of who the homeless actually were and the work LAHOSs did, they were uninterested in listening to the views of frontline workers who possessed this important knowledge:

13 The term top-down is used in a broad sense and refers to higher level, particularly politically led pressures, and does not relate to the rather simplistic and outdated top-down versus bottom-up theoretical debates around the policy making process (Hupe and Hill 2007, p. 279).
I would like to think the frontline staff had some influence but I don’t think we do, I think it is very much, I think it is top line that need to acknowledge the work and I am not convinced that that is always the case, I think they are happy as long as the figures aren’t too high, and there is nothing particularly bad happening, you know, I think it is a service that’s a necessary evil rather than them doing anything to help greatly (Manager, LAHOS K)

These quotes suggest that despite a recognition that discretion permeated the role, service outcomes, at least on a wider level, were viewed as being ultimately determined by higher level concerns. In this vein it appeared that the avoidance of taking statutory homelessness applications was an ingrained and taken for granted objective for most interviewees, though some applied this more assertively than others:

In the last authority (in which the practitioner was employed) no-body was allowed to be homeless, it was basically a bit of a competition between us, the officers, I remember one officer boasting that she hadn’t taken a homeless application for months, can’t say I did that well (Officer Four, LAHOS B)

Interviewees who were employed when the prevention agenda was first introduced by New Labour at the turn of the century supported findings discussed in Chapter Three that statutory applications were subsequently more likely to be impeded:

When I started, it was all homeless applications, and then, imagine how confused I was two months later it changed to prevention, I was a bit confused (Officer One, LAHOS J)

There was a time when, when I started everybody who walked in the door, you would take a homeless application from them, because you wanted those figures to be up there, and then when prevention came in I suppose it was 2003 or four it really kicked in didn’t it and then it was obviously do whatever you can to not take a homeless application (Manager, LAHOS F)

The above quotes indicate that, at least in some authorities, frontline practices experienced a rather dramatic shift as a direct result of the sudden change in political focus.

Alongside central political agendas a few interviewees believed that availability of suitable accommodation had a significant impact on how a given LAHOS interpreted and applied the Housing Act, whereby pressure to exercise negative discretion was exacerbated in authorities with scarcer housing options:
If you have got an authority with a lot of council housing, or a lot of cheap private rented, you can get away with not having to do intentional, because you have other options to get them into before you have to make an intentional decision, so, for a small authority we do a lot of intentional decisions, simply because we cannot sidetrack them into other options (Manager, LAHOS B)

We apply intentionality very very rarely, and I think your stock almost dictates how you use the act, especially here, as we are lucky, as we do have the housing stock to cover people’s needs (Officer Two, LAHOS I)

One of the local authorities at one time, because they had a lot of single persons accommodation would take the stance of ‘we will find single people homeless, and find them priority and give them a full duty’ whereas, if they hadn’t of had that high volume of single person accommodation, they would have been more circumspect. (Senior Manager, LAHOS D)

It was found that authorities in which housing was scarce were more likely to encourage practitioners to exercise negative discretion in comparison to the (albeit few) where some types of accommodation were more plentiful, which follows previous findings (Bowpitt et al 2011; Niner 1989). A good illustration of this was the contrasting instructions given by two managers in respect of how staff should assess if their respective authority had a statutory duty toward a household. In the authority where accommodation was assessed as abundant the manager advised that she encouraged staff to look for reasons to accept a person:

When you take a homeless application you are very thorough, and you look for a priority rather than say there isn’t one... I just hope staff are proactive, and sort of, how can I put it, don’t be negative, don’t look for the no’s look for the yes’s (Manager, LAHOS I)

In contrast a manager employed in an authority with scarce accommodation resources urged staff to look for reasons not to accept an applicant in an attempt to protect resources:

We have to be quite harsh in our decision making process because, as I say, we have got very limited accommodation (Manager, LAHOS C)

The above quotes draw attention to the ways in which supervisory staff may attempt to influence the decision making of practitioners (this is dealt with further below).

This section has only skimmed the surface of how central and organisational factors may influence decision making, as these underpin the overall LAHOS role and are therefore
returned to in later discussions. For example it was found that line managers were responsible for ensuring that organisational, and by extension central goals were met and this is now considered.

**Supervisory influence**

Maynard-Moody and Musheno (2000, p342) argued that a practitioner’s peers could be more influential than that of a senior officer, but it was found that this depended on the style of supervision and what role management played in the day to day running of the service. It appeared that some senior officers were able to significantly shape the pattern of decision making, having a marked impact on individual assessments. For example regardless of the perceived underlying motivation of individual officers (see below) specific judgments may nevertheless be scrutinised and positive outcomes not achieved. For instance in the minority of authorities where managerial approval was required, supervisors were in a position to refuse a more generous interpretation of vulnerability:

> I have got a case at the moment I did think she was a priority, but when I forwarded that to my supervisor she did not agree with that decision so obviously got to go back and obviously find more, do more investigations (Interviewer: why did you think they were a priority, was it a health issue or something like that?). Yes, yes it was, she didn’t have any bad health issues it was just that the medication that she was on, depression things like that and because she was over 50 as well (Officer Two, LAHOS E)

However, supervisory influence was not limited to statutory homelessness decisions and officers who made their own assessments were still subject to pressure. For instance some managers vetted households who required emergency housing, or practitioners were subject to targets aimed at reducing statutory acceptances or use of temporary accommodation (these issues are discussed later).

Two interviewees were fairly new managers and both said that the number of households accepted as homeless or placed in temporary accommodation had diminished since they had taken post. This was attributed more to the fact that officers had been instructed to think differently, as opposed to any change in the structure of service users requiring assistance:

> When I first came here...they were very much a homeless service, a sausage machine, and the number of homeless applications per year were massive, we have turned that
around and we now do mainly prevention and I think last year we took ... less than a quarter of what would have been the year before (Manager, LAHOS K)

Some officers said that they were pressurised by managers to send priority need households away or unlawfully refuse to provide temporary accommodation. A few explicitly accused a supervisor of encouraging gatekeeping:

The manager at the time was a gatekeeper and changed the rules to fit her understanding of what the service can be. The law was manipulated to fit the service she wanted to provide, I think that is the best way I can put it (Officer One, LAHOS C)

Maybe that is something to do with the managers saying, again especially from them then filtering down to say, well if they are from [neighbouring authority] they have to present in [neighbouring authority] rather than us taking them as a presentation (Officer Six, LAHOS B)

Another officer reported that a previous line manager had encouraged staff to pretend to take a homeless application disguised as an advice case if a service user asserted a legal right to make a statutory presentation. In one particular instance, this led to a service user who was deemed to meet the priority need threshold for mental health being sent away, on the proviso that ‘further checks’ would be made:

The manager at the time, well, she was very adverse to us taking homeless applications and we would always have to run it past her if we wanted to take one, she would basically say ‘no, tell them they are not homeless’ or whatever. I remember one particular person who came in with mental health, I mean, I would have assessed them as priority as they were taking antipsychotics and had diagnosed schizophrenia...There was a newish agency person working there, she asked the manager of the time if this person was priority, and the manager said ‘probably not’... so this person went out and told this guy that she would make enquiries but he was probably not priority need so sent him away (Officer Three, LAHOS B)

While the influence of senior staff was evident, practitioners did not necessarily adhere to these pressures. For example one officer advised that management were pressing staff to make quicker decisions on intentionality in an attempt to prevent the need for temporary accommodation pending enquiries, but he refused to allow this to impact on his determinations:
That is probably pressure on management filtering down again, but that is their problem, but for us we have got to try and make a decision that stands. It’s kind of cutting corners and it can have a massive impact (Officer Six, LAHOS B)

Most of the examples above demonstrate that if a manager chooses to be more directly involved with decision making, or applies ‘close supervision’ (Prottas 1979, p155), practitioners have less flexibility in terms of applying autonomy to their own assessments. In this sense and based on the suggestion by some interviewees that managers may encourage contravention of housing policy to meet set goals, it fitted with Evans (2010) findings that supervisors exhibit SLB behaviours if the conditions require it. The aforementioned pressures that bear directly on management may be further exacerbated in the few cases where practitioners suggested that they were either not aware of, or did not concern themselves with central objectives:

Yeah there are lots of targets and quotas, management deal with most of that side of things but we have to log em, we have got targets for prevention, we have to log all our prevention cases and they are looked at annually and reports are sent back to council members. We have targets within homelessness, statutory targets for when decisions should be made and things like that (Officer Four, LAHOS B)

In the above quote the implication was that senior staff shouldered the burden of central directives. However, the few officers who viewed targets as not being their concern still felt its impact in other ways, for example, when attempting to access temporary accommodation (see below).

**Individual and intersubjective (peer) factors**

Although tangible factors, such as meeting organisational goals were important determinants of decision making, as was following the instruction of supervisors, individual level judgement nevertheless proved to be a crucial area in which homelessness assessments may differ (albeit within the boundaries outlined above). Many interviewees agreed that divergent decision making could not be wholly reduced to higher level directives, or, for that matter, a detached interpretation of the Housing Act itself. Rather, it was felt that it needed to be understood in the context of a given decision makers own worldview, life experiences and personal values:

I think sometimes it depends on background, I am from a psychology mental health background so when you see people coming through with depression maybe I am more
hardline, saying, I don’t think that is severe enough, because I have seen the other end of the spectrum (Officer Six, LAHOS B)

In a similar vein to Rashleigh’s (2005) findings, just under half of the interviewees referred to themselves as ‘hard’ or ‘soft’ decision makers and often defined other officers in this dichotomous manner. It was suggested that factors which contributed toward the type of decision maker officers fitted into was not just developed through the role, but also as a result of individual attitudes which existed independently of it:

I think people just come to the job with slightly different approaches, so people feel that they are gatekeepers and they are there to stop people from going through temporary accommodation no matter what it takes and those are the hardliners as I call them, and then I think there are people who see themselves as more there to help people... I have always seen tough caseworkers and ones who are considered to be more lenient (Officer Four, LAHOS B)

The above practitioner maintained that subsequent behaviours and decision making would then be determined, at least in part, by this split. A few managers and practitioners agreed that soft officers would be more likely to apply priority need, whereby those with a harder approach would expect a far higher threshold to be met:

Very often I think if someone is coming in here and they are saying they are homeless there is something wrong, there is some vulnerability there, so yeah, there can be quite a difference of opinion really, on how we apply that. It’s a value judgement very often you know, like is a drug user vulnerable? We [referring to self and colleague] might say yes, but a lot of the staff would say ‘no, no’ (Officer Two, LAHOS I)

One practitioner recalled an incident where her colleague had turned away a service user who had fled domestic violence, advising her to return home and fight for the joint tenancy. When the same person approached the authority a few months later she was seen by a different officer, who provided emergency accommodation immediately, arguing that the original worker was incorrect to send the service user away:

When I came out of that interview, there is no way that I think that women is lying, I believed she was genuinely genuinely fearful of going back...when I came out the ... other worker she kind of said ‘right, has she been lying again’ and I just thought, I just wouldn’t of thought she was lying...Then I discussed it with another worker who agreed with what I would have done, but you know, as I said, I don’t know how much of the story she got... but I do think she got quite a lot looking at the notes. But, then again, I am more experienced than her (Officer One, LAHOS B)
The suggestion that lack of experience caused incorrect decision making was threaded throughout the interviews and is discussed later. Another practitioner advised that due to his softer approach, he would work harder to use discretion to positively assist a household, where his colleagues would be unlikely to do so. In this particular example he moved a family who were receiving police protection due to harassment:

One person might be a bit more generous, whereas another person might say, no, the rules say that, it’s just like, just before I came into this room I had to award ... priority on welfare grounds..., I mean, another person might have said, no, the property is being target hardened, and therefore enough is being done by the police, so it’s kind of, you see that conflict there, it can go either way. but I would describe myself as more softer in approach to the rules, I kind of take in the whole situation, I mean, I could have said no, as it is being target hardened by the police and that’s sufficient, but because I know the geographical layout of the area ..., it’s a bit isolated where they are (Officer Four, LAHOS I)

This quote and the one cited earlier relating to a practitioner’s experience of mental health both demonstrate how personal experiences unique to the decision maker may determine how particular circumstances are assessed.

It was suggested by a few officers that alongside the unique characteristics individuals brought to the role, decision making could be affected by time in post and the quality of training received; interviewees were more likely to refer to these areas in relation to their peers. For example in respect of the former some interviewees felt that those who had been in LAHOSs for a number of years viewed inexperience in a negative light and suggested that this may cause practitioners to make mistakes, or misinterpret particular areas of housing law. This attitude was present when longer term employees were interviewed and was often used to explain what they viewed to be blatant misappropriation of the Housing Act. Those who were newer to the role felt the assumption that they were less qualified to make decisions was in many cases incorrect and it was countered that those who had been in post for several years may be stuck in their ways. For example one officer suggested that the judgement of more long serving practitioners may be clouded due a scepticism that had built up over time:

I was having a discussion with a colleague [regarding a disagreement with a case] and he was like ‘well, I have been in housing for 28 years and you have only been doing it four’ kind of thing, so I don’t know if it is people becoming cynical (Officer One, LAHOS G)
Another practitioner advised that she took more homeless applications than her colleagues and suggested that they may avoid doing so due to a lack of experience:

I probably process the most out of the whole team...I think maybe it is because I am a bit more experienced than the rest of them, maybe more confident in doing that (Officer One, LAHOS E)

Different staff training levels was also viewed as an important determinant of divergent decision making:

I think its maybe how people have been trained so the way, as I, if I just describe my experience, my training, or lack of, I think often you pick up habits up from other people, so I think it can be the way people have been trained (Officer Four, LAHOS B)

We work toward the same guidance, but it is only guidance and we have all been trained by different people, some have had a lot more training than others, some have just been thrown in without any because you are sort of doing the job already, so no, I don’t think any of us really work the same way (Officer Five, LAHOS B)

Training, particularly relating to interpreting the Housing Act, was found wanting in most LAHOSs and is considered when specialisation is discussed below. But suffice to say here that understanding of relevant legislation will inevitably impact upon decision making processes and if the levels between individuals and authorities differ, it may be expected that assessments will at least in part be divergent due to this discrepancy.

Assessment of vulnerability due to older age
As discussed in Chapter One the meaning of vulnerability on the basis of older age is not well defined in housing policy, where it is merely stated that those over 60 ‘need to be considered carefully’ (DCLG 2006, p96). To recap on the survey results a third of responding authorities stated that automatic priority was conferred on the basis of older age (33% over 70, 22% over 60). In one case the information provided in the survey was incongruent to that given at interview whereas a representative for the former stated that their LAHOS conferred automatic priority to service users over 70, but an interview respondent from the same authority disagreed. This does not necessarily invalidate the earlier findings, but rather, was more likely to reflect the assessment differences that existed between practitioners employed within the same LAHOSs. For instance, of the five employees interviewed for LAHOS I one practitioner stated that priority need was awarded to anyone over 60; another that a service
user would need to be past retirement age and the remaining three advised that an automatic priority was not applied. Due to the brief and ambiguous nature of guidance in this area, it was not surprising that responses between (and within) authorities differed widely in terms of what was perceived as constituting vulnerability on the basis of older age.

A few officers suggested that each person would be assessed individually and that no rule of thumb was adopted:

We wouldn’t use a criteria of priority, not for age, no...we will take each person on their merits, clearly age would be a trigger for, you know, double check as it were, make sure everything is hunky dory (Senior Manager, LAHOS D)

The principle of assessing individual cases on merit is theoretically sufficient if age is factored into a subsequent decision with regard to vulnerability. However, this also meant that some responses were difficult to interpret:

I don’t think there is a black and white rule really, but sometimes there is a case of, say you have got someone who is 96, I once had a customer who was really old, about late 80s, when I asked him all the questions, no no no, I haven’t got any health issues, so on the face of it, you know, it seemed that he was okay, but I think I did find him in priority need just based on the fact that he was really really old and although he said no to everything, and didn’t really have any issues, I did think he was vulnerable, certainly there is nothing in black and white, but I think in most cases if someone is really really old, nearing 100 then we would just say, well look come on (Officer One, LAHOS A)

In line with the use of more subjective reasoning and returning to the discussion around individual values, it was suggested that determination of vulnerability would depend on the experiences of the case worker and the older people that they themselves had come into contact with:

That is again a very subjective kind of thing isn’t it, and it’s how you view older people, I think that often is coloured by the kind of people that you come into contact with, like your parents or, you know, or people that you see regularly (Officer Two, LAHOS B)

Alongside those who claimed to base assessments at an individual level some interviewees referred to a specific chronological age range when considering if an older person reached the threshold of priority need. Specific examples of this were touched upon above in relation to officers employed in LAHOS I, but many suggested that vulnerability would be conferred to
someone nearing 70, with one line manager suggesting that the application of priority in respect of this age group would be a ‘no brainer’ (Manager, LAHOS B). Yet this was not so for another practitioner, who felt that a fit and healthy 80 year old would not be considered vulnerable within her authority.

In a similar vein to Bretherton et al’s (2013) findings around the use of visual cues to assess severity of mental health (discussed in Chapter Three), a few decision makers suggested they would consider outward appearance when assessing vulnerability due to older age:

We tend to accept the over 60s unless they come in straight from the gym having pumped iron (Manager, LAHOS K)

We would consider that without question really, if someone is vulnerable as a result of age, unless they were a fitter athletic pensioner (Manager, LAHOS L)

Reference to older people who ‘go to the gym’ or ‘run a marathon’ tended to be employed as a humorous anecdote, particularly where interviewees were attempting to elucidate that older age was not necessarily analogous to vulnerability:

If you get nearer 70 you’re going to think, yeah, but you’re 60, you have got no health issues, you could be like running a marathon every week, I can see with 70 like, 70 is a bit old (Officer, LAHOS J)

Whilst a pathological depiction of older age is not advocated, there needs to be a balance where it is recognised, in line with housing policy, that people over 60 must be given special consideration. Although it was suggested in Chapter One that use of an age cut off point could be perceived as discriminatory if unsupported by sufficient reasoning, there is nevertheless ample research evidence which links older age to more detrimental homeless outcomes (a fuller discussion was provided in Chapters One and Three). On a related point there was a concern that only a few practitioners referred to the Pereira test, seemingly assessing how older service users presented at initial interview rather than considering if that person would be more vulnerable than an ‘ordinary person’ were they to become street homeless. The following quotes relate to the only responses which appeared to factor Pereira into the decision making process:
If they were over 70 I might use the vulnerability thing that they would be vulnerable on the street, but I certainly don’t think over 60s you can anymore, unless there are like, other mitigating factors (Officer One, LAHOS B)

Yeah, and I think even if you are priority need there is no set age for when somebody becomes priority need, you might say yourself as an authority or as a team but you can get 70 odd year olds who run marathons quite easily and half of them are probably fitter than I am, do you argue that just because they are 70 years old they should be getting priority need, because if they do sleep rough, then they are worse off, yes (Officer Six, LAHOS B)

The quote cited below aptly highlights a common confusion which appeared to persist around the Pereira test:

It says vulnerable as a result of homelessness when compared to an ordinary person, well, one of my colleagues who left now felt that if someone was working they were not priority, but that’s just not right, because it is asking what would happen if they became homeless, I mean, someone in a wheelchair could be working, but they are going to be priority if they are homeless (Officer Three, LAHOS B)

This seemed to be a consideration that some practitioners missed, that is, many interviewees focused on how an older person might present at that point in time, as opposed to applying the Pereira test and ascertaining what would happen if that person were to become roofless. These citations, alongside those highlighted earlier in the section, arguably suggest that some decision makers possess a limited comprehension of how older age per se may contribute toward vulnerability in the event of this group becoming roofless. On a final point it was found that despite a number of references to active older service users when discussing the threshold of vulnerability due to age, when interviewees were asked to discuss the specific housing issues this group might encounter the perceived causes were fairly narrow, and generally limited to individual rather than structural factors. This finding is returned to when the use of age related stereotypes is examined in the next chapter.

Changing conceptualisation of older age

The survey and interviews found a more stringent interpretation of vulnerability due to older age when compared to research undertaken prior to the prevention agenda (no comparative data was found post 2000), whereby automatic priority need was conferred in the majority of researched LAHOSs. For example the London Research Centre (1990 cited by Age Concern 1991) found that 81% of responding London authorities conferred automatic priority need to
applicants over 60 and Hawes (1999, p199) who established that of 50 LAHOSs surveyed 70% treated all over 60s as vulnerable. In a similar vein it contrasted to Niner’s (1989, pp30-31) finding that all bar one of nine authorities interviewed confirmed that priority need would be automatically awarded at the age of 60, or on reaching retirement age. The analyst aimed to understand why an apparent drop in the number of authorities who awarded automatic priority need on the basis of age had occurred. For example was this due to stricter decision making as a result of tighter resources, or could it be linked to the arrival of the prevention agenda, which post dates the earlier findings, or is it attributable to the changing perceptions or social construction of the meaning of older age over time?

There were no straightforward answers to these questions and it is perhaps best to view it as being due to a mixture of all three. As discussed above (and further below), some interviewees contended that decision making had become tighter due to resource shortages, and one referred to an authority who had increased the age range from 60 to 65 in response to fiscal pressures. It may also be assumed that older people have been affected by the drive to reduce statutory homeless acceptances to the same extent as other groups (evidence of gatekeeping is discussed in the next chapter). In respect of the final point the responses of a few practitioners suggested that perception of the age at which someone should be viewed as an older person had changed:

That’s the way it was years ago, I think that from the interpretation of the act at the time it was very clear that you were vulnerable if you were 60 and then it was never mentioned then that you could be approaching old age with no ill health, so it was very much like ‘oh, someone is 60, I don’t have to do an investigation because they are vulnerable’, things have changed, more people are approaching 50, I am 50... People’s interpretation of the act have changed over time (Manager, LAHOS I)

It’s not just age related anybody over 60 we wouldn’t you know, we wouldn’t look at those being in priority need, 60 is the new 40, so, yeah, we would look at it in the same way as we would any other person, you know, in terms of vulnerability (Officer One, LAHOS C)

Well, there is no upper limit anymore, I noticed when I first came here people’s perception of that was completely different to my previous authority because, I came in saying ‘well, they are 68 but they are still working, why have they got a priority’ but, yeah, here was softer whereas now, we have sort of taken age back out... So, yeah, you can’t really look at age, cos, it’s not defined so we don’t. Well, we have to be careful, because we live longer, we live more healthily generally, and therefore vulnerability threshold will be harder to meet in years to come (Manager, LAHOS C)
The above quotes draw attention to the fact that definition of vulnerability due to older age is fluid over time and space. The final citation demonstrates once again how a senior officer has the potential to alter decision making mechanisms within an authority (it should be noted here that this was one of the LAHOSs where the manager approved all statutory homelessness acceptances). A more fundamental issue in respect of the last two examples is the suggestion that age ‘blindness’ should be applied to assess vulnerability of older service users, which as discussed above with reference to the Pereira test, is potentially unlawful. But priority need on the basis of older age is a poorly developed area of caselaw, which in itself may pose questions. For example is this an indication that older people are more reluctant to appeal decisions, which has been suggested (Pannell 2002; Help the Aged 1999; Parry and Means 1999, p19) or are legal organisations less likely to take on these cases? Although there is no reason to believe the latter, no studies have specifically explored this issue. The changing conceptualisation of older age is explored further in Chapter Eight.

In summary if an older person seeks help, they may be unwittingly entering a bureaucratic game of chance, whereby the type of decision maker they see, local scarcity of accommodation options or the priorities of an organisation, may dramatically affect the outcome:

I think it is slightly a lottery, you know, if that person had come in an hour later and got one of my colleagues on duty, they would have probably got a different response, it does worry me a bit cos I just think well, it isn’t fair on the individual if there are quite big discrepancies on how people perceive vulnerabilities and things like that (Officer Four, LAHOS B)

**Practitioner specialisation and availability of services**
The following sections consider the extent to which the LAHOS role can be defined as specialised whilst exploring potential barriers to effective provision for older people. When specialisation is considered in respect of individual caseworkers the chief concern was with the quality of advice provided, whereas at the organisational level the focus was more on the availability of tailored services. This section begins by looking at Lipsky’s interpretation of specialisation before outlining the main obstacles perceived to hinder successful or equitable outcomes; workload pressure, training issues and scrutiny. It will then concentrate on the quality of advice and availability of specialised accommodation or services in respect of older people. As with the exercise of negative discretion, the majority of interviewees attributed
inadequate or unequal provision to resource scarcity which is considered in greater detail in the next chapter.

Scope of the role

Lipsky (1980, p146) defined specialisation of function as ‘fostering efficiency, permitting workers to develop skills and expertise and concentrate attention on their work’. It relates to the application of specialised context dependent skills, but also the adoption of routines to simplify elements of the role and thus ensure greater efficiency (Lipsky 1980). He further maintained that recipients of a given statutory service would essentially be narrow in scope due to limited availability (Lipsky 1980). Finally, specialisation was seen to focus a practitioner’s abilities on precise and narrow areas, which would generally disregard the wider issues that may affect a given service user (Lipsky 1980, p147).

It has been discussed in previous chapters how households at threat of homelessness may be in contact with a wide array of agencies; these will differ dependent on the particular circumstances of the individual but may include welfare, debt, social care, advocacy, health, substance misuse or criminal justice services. Due to their broad ranging nature housing problems were normally linked to wider issues and correspondingly a number of agencies could potentially become involved. For example many support organisations assisted with money management to deal with rent arrears and probation officers or social services might attempt to secure accommodation for their clients on the basis that it was a condition of bail or a residency order.

However, external agency involvement did not mean that LAHOSs could ‘narrow’ their function and concentrate solely on an identified housing issue. Many interviewees referred to a ‘holistic’ element of the role, advising that in most cases it was necessary to engage with the wider picture as part of a statutory investigation or to ensure homelessness was prevented where possible. Despite reporting that contact with external organisations was necessary, only one interviewee believed that her department was viewed favourably by other departments or agencies. Many reported that LAHOSs were on the periphery and the work they undertook was undervalued and not well understood. One senior practitioner for example stated that most external agencies assumed the role of a LAHOS officer was far narrower in focus than it actually was:
I have noticed that we as housing are expected to do so much more now, because the perception outside is that you just put a roof over somebody’s…it’s never homelessness problems in isolation...We had a welfare reform seminar last week and it was a multi agency thing so I took the opportunity to bring along one of our advice forms that is 16 pages long, just to prove to people that we don’t just deal with the roof bit of it, it’s the whole holistic approach. I hate that word really, but, I said, if anybody wants to take this away so you can just see, the depth that we do go into with people, nobody took them away, but, it was just to illustrate really that, it’s a bit of myth busting, that all you do is housing, cos, you don’t (Manager, LAHOS F)

On the surface these findings suggest that the LAHOS role, at least in principle, operates at a broader level than Lipsky’s (1980) definition of specialisation might suggest. However, the phrase ‘in principle’ is pertinent here and due to a perceived mismatch between statements relating to how the service ‘should’ be run as opposed to what ‘actually’ occurs in practice, a depiction of the role as holistic is questioned.

*Impact of workload on service provision*

While the LAHOS role ideally incorporates a broader set of skills than that of the wider SLB environment described by Lipsky, the ability to provide the holistic service required was often impeded due to heavy workload demands. Most officers felt they did not always have the time to provide a tailored or sufficient service and moreover, were unable to fully explore options with each household who required help. One of the reported reasons for high workloads was that of staff shortages. In Chapter Two recent Coalition cuts to local authorities were discussed and although a few of those interviewed reported that staffing levels had increased in their department, albeit with limited or insecure contracts, in most cases levels had remained the same or reduced. A few interviewees advised that their department had always operated on a ‘lean’ basis and that government cuts, alongside increased footfall had in some cases made effective service provision unworkable. In respect of authorities where staffing levels had reduced this had been achieved through a mixture of voluntary redundancy, not replacing staff who had left of their own accord, or passing on what was assessed as more ‘basic’ elements of the role to lower grade staff (see below). One practitioner whose department had recently lost two advisers’ referred to a recent period when the department was particularly thin:

Well, we were just like on duty everyday and duty is like on the frontline so anybody that walks into the office, they are the people we see every day and for two weeks solid we were on that front counter so we weren’t doing any back work, any investigations, any paperwork, we were just seeing and seeing and seeing
people... well, the service that we give is not 100% because obviously we are trying to in effect rush through it because we have obviously got other people waiting in reception so we weren’t giving 100% (Officer Two, LAHOS E)

A number of interviewees reported that heavy workloads were a chief cause of stress and had in some cases caused practitioners to take time off sick or leave the organisation, which would then further impact on the workload of remaining officers who were expected to cover the duties:

We have had a couple of members of staff where the volume of work and the particular cases they were dealing with had a detrimental effect on their health... I think, it’s fine if everybody is at work... and that is where the pressure starts, so, it is a service that really cannot survive for very long without the full quantity of staff (Manager, LAHOS K)

We have had several members of staff leave the job through stress...it is a highly stressful job, you know, you are, again it sounds clichéd, you have got somebody’s life in your hands to say whether you are going to give them a house or not, and then again, it might depend on your personal threshold but it can be at times, you have got 30 plus cases on your caseload, all needing, not all investigating, but all needing information, all needing stuff doing,. You just kind of think have I got time to do it, its time constraints, things like that (Officer Six, LAHOS B)

One participating authority had attempted to reduce selected elements of the practitioner role in an attempt to ‘ease pressures’ or as a way to reduce the number of frontline staff required:

We have done a lot of work to look at what parts of our services can be handled off to customer services, so the basic enquires that a customer may come in and says, they want a list of landlords, that sort of thing a lot of processes, that are documented that have been transferred to customer services (Manager, LAHOS E)

However, one manager felt that allowing more generic staff to advise customers resulted in a poorer outcome to the service user:

If you were a homeless person, or thought you were going to be homeless...you made an appointment through customer services, what I found when I came was that customer services were not really asking the right questions, they were making a lot of appointments and we were about 3.5 weeks ahead of ourselves, the end result to that was people often didn’t turn up for appointments, or if they did what you were saying to them is, well actually I am sorry, but what the landlord has told you isn’t true and that notice is a load of rubbish, they wouldn’t be very happy that they had to wait 3.5 weeks to be told that, so the way we do it now, we use a medical term, we triage our customers ourselves and we wouldn’t allow customer services anywhere near them (Manager, LAHOS K)
On the other side of the coin a few LAHOSs aimed to increase specialisation within their authority. It was discussed above how practitioners became involved with the wider environment in which housing problems coexist, but some authorities aimed to explicitly incorporate these outside factors within the main role. For example one LAHOS aimed to include ‘wellbeing’ questions in the main housing options form, another hoped to amalgamate the role with employment advice. A few others aimed to set up an ‘enhanced housing options service’, which would involve providing advice around areas such as education and employment, alongside housing. The latter follows recommendations made by the previous Labour administration (DCLG 2008a) in recognition of the fact that housing problems did not exist in a vacuum and have been echoed by the current Minister responsible for homelessness, Kris Hopkins (Gov.UK 2014).

These aims are no doubt laudable and as has been iterated in previous chapters, employment status can have a direct impact on housing, so incorporating advice around this area in an attempt to prevent homelessness makes sense. However, plans to offer a more holistic service appeared purely aspirational; no authority could provide a definitive timescale as to when the ideas may be implemented due to the aforementioned time pressures and staff shortages. In the case of the authority which aimed to introduce employment advice into the role, they had recently lost two members of staff and moreover, were the same LAHOS who had passed parts of the current role on to lower grade advisers in an attempt to ease workload levels (this topic is returned to in Chapter Eight).

Training issues
Alongside sufficient time, adequate training or guidance was viewed as an important element to ensure effective delivery of a specialised service. As reiterated throughout this thesis the role of a LAHOS worker is broad, and at times, complex. Further, the requirement to apply legal directives on a daily basis mean that training and updates are vital. Yet only employees based in four of the participating authorities reported that they had a good training structure and in one of these cases only half the interviewees agreed, primarily because caselaw updates tended to be neglected. One interviewee reported that even though her authority had good training in place, staff were unable to keep abreast of legal challenges due to its relatively frequent occurrence and the associated difficulties of working ‘on the coalface’ (Manager, LAHOS K). Even in authorities where it was theoretically available, time resources again proved to be an issue:
Probably the time, and probably they can’t spare us; it’s a small team (Officer One, LAHOS G)

Others reported that adequate training had never been provided, not even prior to undertaking the role:

It’s been a lot of kind of learning as you go along, I don’t feel that I was given a proper, I was given a day’s overview of the Housing Act, this is the Housing Act in a nutshell, and, of course, its colossal, each part of it, each area of priority need for example you could probably spend a day on and so it’s just been a little bit of a case of you pick it up as you go along, look it up in the Code of Guidance (Officer Four, LAHOS B)

One officer stated that he had never received training and as a result relied on his own ‘self taught’ knowledge when making assessments:

I guess what you mentioned there is a grey area [assessment of vulnerability], although when I say grey area, I don’t exactly know what the full policy is in the Housing Act, or what the Housing Act states specifically... I haven’t had specific housing training, it’s kind of all been self taught...I just had to kind of teach myself more the housing, you know, side of things and gradually, I kind of picked it up. Obviously I am not an expert on the legal side of things, the Housing Act or anything like that... I am kind of just self taught really (Officer Four, LAHOS I)

Alongside workload issues resource scarcity was a central factor in understanding the lack of training and in some cases this was overtly connected to the choices departments were required to make in the current austere climate:

Since the cuts last year we were basically told we had the choice between losing one member of staff or there would be no more training in the next few years. But they had to save money, it is really really horrifying how much money they have had to save (Officer One, LAHOS J)

It was further found that smaller authorities did not have access to the training facilities which were available to their larger counterparts. But even though training was reported as being more readily available for the three larger LAHOSs in this research, the issue of time and staff resources was still present. There also appeared to be a geographic element, whereby one authority complained that the best training took place in London and they could not afford to send staff there.
On a final note time and resources were not always viewed as the primary cause of inadequate training for all practitioners, with one interviewee pointing out that some officers did not make efforts to keep up to date with caselaw because they had no empathy or concern toward service users, merely treating it as a job that paid the wages:

People, they just don’t care, they are just wanting to shift people through the door as quickly as possible, just not caring, it is quite frustrating because obviously we are wanting to drive service levels up, we are wanting to provide a better service, but then you might have somebody that is like, I don’t care one thing or the other, it’s just a job it pays the bills (Officer Three, LAHOS E)

This offers an important reminder that practitioners themselves are not only influenced by external factors, but have an element of free will, albeit within a context of scarcity and multiple pressures. It may be that workload and resources impede the time available to read up on housing law, but it may also form a conscious decision, suggesting it is an area that will require supervision to ensure legal knowledge is up to date.

**Scrutiny**
As seen above, the discretion exercised to reach a decision and the specialisation required to make legal interpretations cannot be understood in isolation and must take into account the wider environment in which practitioners operate. As highlighted by Lipsky and discussed in Chapter Two, an important consideration when assessing the freedom of officers to make decisions is that of internal and external scrutiny. Many interviewees felt that the service they provided was unduly influenced by outside pressures, not just emanating from departmental supervisors or government departments (as discussed above), but also due to exogenous organisations such as the third sector (covered in Chapter Seven) or popular media. In respect of the latter an officer remonstrated that practitioners were required to prioritise whatever the press dictated was a salient issue at any given time:

I find it a bit reactive, especially to new things, this is the new thing in the media so, everyone has got to be really aware of this, like, last year it was rough sleepers, this year it’s the welfare changes and it is like everyone is suddenly, or the councillors are jumping up and down about the latest fad and meanwhile we are still dealing with the same thing, all the time and then everyone is getting excited about a certain thing because that is all over the media and stuff (Officer One, LAHOS J)
Regarding internal scrutiny all bar one authority operated some form of performance measure in relation to the role. It was found that even if practitioners were not explicitly given targets to work toward, management may be required to adhere to them, and this would correspondingly permeate through to the frontline. Regarding the recommendation to reach statutory homeless decisions within 33 days most authorities considered this as a rule of thumb, but some were pressured to keep within this time frame to a larger extent than others:

I heard someone in...saying that if they don’t make their enquiries in 33 days they just have to make a decision, it's mad, obviously you try to do them as fast as you can, I couldn’t believe that (Officer One, LAHOS J)

In terms of intentionality one practitioner said that the manager of his authority was encouraging staff to reach quick decisions:

The pressure is to move them on and make decisions quickly and obviously if you have got your 33 days you do feel that sometimes you need to be doing it quickly and we have had recent instructions to try and get intentionality decisions done before we place someone which is, well A. Probably wrong morally, B. Dangerous in case we make a decision that is easily challenged because we haven’t investigated everything (Officer Six, LAHOS B)

Additionally, the pressure to keep temporary accommodation levels low was a chief objective for many LAHOSs, primarily owing to shortages:

As a team, [we have] almost trained ourselves at being really good at not having to use temporary accommodation unless it is completely, absolutely necessary (Officer Four, LAHOS I)

A few practitioners stated that these targets caused stress, as they felt pressurised to avoid the use of temporary accommodation, despite dealing with literally homeless households whom they had a legal obligation to accommodate:

There are figures in terms of how many people come in needing B&B at some point, and also how long people are in B&B, you know, families for six weeks, or less, so that is something that is always at the back of my mind and also, yeah, keeping homelessness acceptances down and it is, it is quite difficult because, it, means that you are constantly worrying about the numbers. But again, because of the time pressures, you don’t really always have the time to kind of concentrate your efforts on trying to reduce them (Officer Two, LAHOS B)
It was found that the underlying element of all LAHOSs interviewed was the need to prevent homelessness and avoid statutory applications where possible. This topic, alongside further examples of how statutory pressures contributed toward gatekeeping behaviours, is returned to in the next chapter. Prevention was commonly perceived as the gold standard with many interviewees, particularly managers, suggesting that statutory homeless applications should only be taken if it was completely unavoidable. For example one supervisor said that they were introducing a new system which would be able to track the preventions each caseworker did, thus monitoring if some officers were less likely to do preventions than others. Another authority stated that all their preventions had to be recorded and they were then presented to councillors annually. These examples can assist in an understanding of how officers may experience the effects of peer pressure, as they are being directly compared to others in terms of wider interpretations of job role priorities.

**Specialisation of function and older people**

As discussed in Chapter Three a number of scholars have maintained that older people at threat of homelessness would benefit from customised services as they tended to avoid generic provision due to a perception that it was for ‘younger’ people. Despite these findings very few practitioners felt that services tailored toward older people were necessary, suggesting that resources would be better targeted elsewhere:

Our new service manager has mentioned that there may be a specific post, that’s actually going to be housing options for older people, so a specific job role... I argued that that money might be better spent getting a full time private rented worker but apparently it is a different pot of money (Officer Four, LAHOS B)

Curiously no other interviewee employed by authority B mentioned that an options adviser for older people was pending and as specific questions around this area were asked, it can only be concluded that they were unaware of it. Another officer felt that younger people should be given more settled housing options and argued that accommodation available specifically for those over 60 should be used to achieve this objective:

You have places that are so hard to let and a lot of them are like really small rooms, like bedsit type rooms that would be suitable for younger persons accommodation, I think it does need looking at. They are like self contained studio flats, perfect for someone under 25. I would have loved that (Officer One, LAHOS B)
The same officer then expressed sympathy for the particular circumstances of ‘younger older’ people at threat of homelessness:

Over 50s is really tricky because I always feel really sorry for them, because, if you’re over 60, even if you are not priority need and so not put in gold band, you are going to get something probably, some housing associations specify over 55, there is some private schemes that we have and there is a leaflet we have for over 50s and a guide on housing for older people. But I think 50s is a funny age, because 50s is the new 40, it’s not very old, and I think a lot of 50 year olds, if you said, apply for schemes for older people they would probably tell you to get lost, that they don’t want to live in an old people’s home (Officer One, LAHOS B)

Colleagues employed in the same organisation shared this sentiment:

We do get people in their 50s and really they are kind of in this limbo period where they would be treated as anybody else who is younger, fitter, and non priority need really a lot of the time (Officer Six, LAHOS B)

I have dealt with people in that kind of age category it does tend to be people who, people with no priority in terms of health problems, people who have grown up children, so then, they are not priority need anymore and a lot of them are facing going into shared houses, which, at that age, is pretty.... due to affordability, and lack of being able to access one bedroom properties. I think there are issues definitely and also, I guess health problems, which don’t necessarily make them priority need, but are there and are going to continue to get worse, but chronic health problems, like I said, are not serious enough to put them in priority need (Officer Two, LAHOS B)

The officers’ explained that although housing opportunities for the over 60s were more plentiful, service users below this age group were often faced with very limited choice. It was found, particularly in LAHOSs with scarce accommodation levels that the ‘younger old’ had even fewer options than younger or older cohorts, particularly in respect of temporary hostels (see below).

*Accommodation options for older people*

In respect of private rented options the recent welfare reforms have had a more dramatic impact on people under 35; this is due in large part to the change in law which means that LHA can only be claimed for shared accommodation. When interviewees were asked if older people were able to access private rented tenures in the local area most reported that it was very difficult. This was due to a lack of availability of self contained private accommodation, the fact that many landlords would not accept tenants who claimed LHA and affordability
issues due to an increase in rent top ups following reductions in overall levels (which have affected all age groups). Following on from this a few practitioners suggested that those unaffected by the shared room rate were still required to look for shared accommodation as they could not feasibly access self contained:

It is hard for people over 35 as well when you say, shared private rented, because even then a lot of them have to think about a shared house and I think they think it will be full of young people smoking cannabis, it’s probably their experience from when they were younger, it’s still hard, because the one bed rate now... what are you going to get for that? You are not going to top that up out of your benefits and then pay for food and everything on top, so even then, you are realistically thinking, you’re not going to do it (Officer One, LAHOS B)

Further, the fact that half of LAHOSs required priority need to award financial assistance toward the upfront costs of securing private rented accommodation meant this tenure moved even further out of reach for older people who did not meet this threshold.

A significant number of LAHOSs advised that there were more settled housing options for older people, but as stated above, these were normally targeted toward those who were classed as disabled or over a certain age. Further, the type of accommodation offered tended to be sheltered or in the case of a few authorities, small properties in ‘less desirable’ areas. For example a LAHOS who suggested they had more plentiful accommodation for older people described the types available:

The one bedroom bungalows are quite small, quite cramped, but if somebody literally wants accommodation they can’t be too concerned. I am not saying that they are dumps or anything like that but they are for someone downsizing from say, a three or two bedroom they are a wee bit cramped (Senior Manager, LAHOS D)

We have got quite a lot of difficult to lets that are targeted at that [older] age group (Manager, LAHOS D)

Perhaps more important for the purposes of this research is the availability of suitable accommodation for homeless older people, as even in the few cases where social housing was relatively abundant, a waiting list still operated. This meant that if shelter was required quickly an older service user would likely need to acquire a hostel if there were no other options. As discussed in Chapter Three scholarly findings maintained that older people tended to be intimidated by younger hostel residents and in many cases avoided this type of
accommodation if it was aimed at all age groups (Crane and Warnes 1997). Yet it was found that no authority interviewed had specialised emergency accommodation for older people. In contrast nearly all participating LAHOSs had hostels tailored toward younger people, either in their own authority or in surrounding areas. It was pointed out by one LAHOS that:

There is definitely more options for younger people than there is older people, I mean the only options that we have is obviously private rented accommodation getting them on council waiting list ... [and] two homeless hostels for any age category (Officer Two, LAHOS E)

The officer then went on to name a number of hostels or supported housing projects which only accepted people under 25. It is not being suggested that services for younger people are too plentiful, but rather, that specialist accommodation may be advantageous to older groups also. In summary, many ‘healthier’ or ‘younger’ older people fell between the cracks of provision in respect of the 12 LAHOSs interviewed. That is, there was no availability of age specific temporary hostels for this group, most settled specialised housing was designed for frailer cohorts, and many could not access private rented or similar schemes due to the lack of a recognised vulnerability.

Specialised advice services for older people
Although interviewees in two LAHOSs advised that their department was due to recruit a specialist adviser for older people, no definite post was in place at the time of the fieldwork. Further, it was found that very few interview participants were aware of initiatives or advice services in their respective areas other than providing loose references to national organisations such as AgeUK:

I mean there are just the well known charities, but if I were to say I had made a referral to any of them I would say no, I mean, if someone is, you know, needing support I don’t know, they, I can quickly Google something and give them the details of it, if I was to say I would make a specific referral to a charity that is specifically for older people, no (Officer One, LAHOS A)

In some cases this merely reflected the reality that in over half of the responding authorities no third sector or statutory organisation whose role was to assist older people affected by homelessness appeared to exist. Where local authorities addressed housing and older people the services offered tended to correspond with policy documents considered in Chapter
Three. That is, they were generally geared toward concerns more associated with the ‘oldest old’, such as a move by choice through downsizing, or by necessity due to frailty. While these issues are not unimportant, it is striking that other possible determinants of homelessness in respect of older people were relatively ignored. However, initiatives aimed exclusively toward older people affected by homelessness were found in a minority of responding areas, though most interviewees employed in these authorities appeared unaware of them. For example in a larger participating LAHOS a specific drop-in advice session was advertised on the council’s website. Although it had a greater focus on the oldest old, looking at handyperson schemes, adaptations and warden accommodation, it also provided advice on benefit maximisation and general money issues, which as discussed in previous chapters, can be major causes of homelessness. This authority had also devised a housing options leaflet specifically for people over 50. Yet no officer was aware of the drop-in sessions and less than half of the interviewees advised the researcher of the leaflet’s existence.

In respect of the extra large authority who participated in the study the council had created a strategy specifically looking at older people’s housing in the area, which touched upon issues relating to the condition of private rented, budgeting and multiagency working, alongside lifetime homes and extra care housing. A pledge incorporated in this strategy was to train frontline staff to provide good housing options for older people; yet the practitioner interviewed was unaware of this. Yet another large authority offered a very comprehensive website designed for older people, which covered an array of topics relating to finding suitable accommodation and welfare benefits, but again, the officer interviewed seemed to have no knowledge of this. Alongside a lack of awareness of local authority run services, only a small number of interviewees named specific local or national third sector services that older people could access. A few interviewees suggested AgeUK, but appeared unsure as to what help this organisation could provide. Yet in one responding authority AgeUK offered an extensive local drop-in service which included outreach and help to claim welfare benefits. All these initiatives designed to assist older people with housing problems were accessed via a straightforward Google search on the internet.

These findings question the quality of specialist advice an older person affected by homelessness may expect to receive in some LAHOSs due to an observed lack of awareness on the part of the advisers in question. Linking in again with the points discussed above these gaps in local knowledge may have been due to time scarcity, poor training, or a lack of
communication with the organisations providing the service (which again, may be attributable to time issues). However, it may also be due to the fact that LAHOS professionals did not take the time to assess local services due either to a perception that older people (generally the oldest old) were unaffected by homelessness in a ‘conventional’ sense, or failing to distinguish (generally the younger old) as a distinct group. In respect of the latter point and as discussed above most interviewees did not recognise that older peoples’ needs may be distinct from those of younger groups. Correspondingly, in one of the two authorities’ who were due to employ an older person’s adviser, the officer who informed the interviewer of this felt the resources could be better spent elsewhere.

It is argued that if tailored or specialised services for older people are available, particularly when they arise from the local authority itself, LAHOSs must ensure they are aware of them so a full range of specialist advice is provided. It is further a concern that these potentially invaluable resources, which can assist in lightening the workload of LAHOSs, remain untapped if potential beneficiaries are not aware of their existence. Linked to this is a concern that the availability of schemes for older people may be subsequently viewed as an unnecessary outlay if adequate footfall is not achieved; this discussion is returned to in Chapters Eight and Nine.

In earlier parts of this section the holistic nature of the role and departmental ambitions to increase and widen the scope of specialised advice was discussed. Yet the findings in respect of older people suggest that before the latter becomes feasible, the knowledge to provide tailored advice or signposting which should fall within the parameters of the current role need to be addressed. It is reiterated that LAHOS employees are not charged with deliberately providing a less than perfect service; as has been shown above, a number of mitigating factors often compete and the pressures that emanate from this appeared to frequently direct service provision.

**Conclusion**

Adopting themes from Lipsky’s SLB framework to analyse the main components of the LAHOSs role showed how particular pressures or responsibilities could negatively impact upon some elements of service delivery. It further highlighted how severe resource scarcity led to inadequate service provision in the main. Although individual level factors impacted on decisions, illegitimate discretion was mainly attributed to higher level pressures which
emanated from central or organisational directives. It was also identified that supervisory staff experienced both frontline and higher level pressures and thus may encourage unlawful gatekeeping to ease this.

In respect of interpreting vulnerability as a result of older age, this chapter has shown that assessments differ widely and were not necessarily linked to housing policy. With regard to service provision for older people, what was particularly striking was that where (albeit limited) initiatives for this group were available, very few interviewees seemed aware of them. It was suggested that this lack of awareness may have been related to higher level or individually perceived priorities. The next chapter focuses more explicitly on how pressures inherent in the LAHOS role impacted upon the service a given household at threat of homelessness could expect to receive, with a focus on Lipsky’s themes around client differentiation, screening, and gatekeeping.
CHAPTER SEVEN

Discussion of Interview Findings: Frontline Delivery and the Third Sector

Introduction

Whilst the previous chapter touched upon the interaction between LAHOS employees and service users during delivery of the role, this chapter focuses on those relationships in greater detail. It employs three concepts based on Lipsky’s SLB framework (as shown in Figure 6.1 in the previous chapter) to assist with the analysis, that of client differentiation, and rationing through the employment of screening and gatekeeping. It was found that screening and gatekeeping practices generally occurred as a direct result of the specific work pressures outlined in the previous chapter. On the other hand, client differentiation was attributed to a fusion of interpersonal and higher level influences. This chapter begins by elucidating what is meant by client differentiation before highlighting how discrimination, and the bias or stereotyping that can emanate from this, may impact upon older service users. This is followed by a discussion of the findings related to screening and gatekeeping. When assumptions concerning older people are examined, these should be treated as interspersing with other circumstances, such as attitudes toward service users fleeing domestic violence, leaving prison, or suffering from specific health conditions. In other words, the service quality provided to older people cannot be comprehended without an appreciation of the wider spectrum of circumstances with which they may present with.

Client differentiation

Lipsky (1980, pp105-106) pointed out that to manage workload and resource scarcity it was generally necessary for SLB’s to differentiate, focusing on the ‘eligibility, culpability, and suitability for bureaucratic intervention’. This practice will necessarily lead to a negative outcome for some (as not all can be assisted), meaning that certain service users will be subject to stereotyping and bias (Lipsky 1980). Differentiation thus forms part of the overarching task of socially constructing service users into categories for the purposes of efficient processing (Lipsky 1980, pp59-60). Yet while organisational level concerns are important, primarily attributing differentiation to this, as argued in Chapter Two, is not viewed as sufficient. For
example Chapter Six suggested that a fusion of organisational, peer and individual led factors all played a part, with a number of interviewees placing a greater emphasis on individual values gained outside of the role. It was further believed that the attitudes of specific practitioners were generally fixed, and as long as discretion could be applied, its presence would be felt:

We do all have different kind of viewpoints, because we can’t be completely objective I don’t think it is possible, because we all carry with us, those different values (Officer Two, LAHOS B)

Further, most interviewees felt this subjectivity was both ubiquitous and inevitable, whereby even the more discriminatory assumptions were not outwardly condemned as a negative practice per se, but rather, viewed as an inevitability:

It is human nature, you know, what you may say ‘I don’t find that priority need’ or, ‘I find that an intentional act’ another person might think, maybe because of their own life experience, they don’t think it is probably an intentional act, or maybe they think, because of their life experience that that is a very debilitating illness (Manager, LAHOS B)

Yet while on the surface it may appear that the assumptions held regarding particular service user characteristics or circumstances can be chiefly ascribed to the personal views of respondents, it could equally be asserted that particular values or perceptions gain prominence due to specific factors inherent in the role. For instance justification for behaviours which occurred as a result of prescribed beliefs, such as gatekeeping, was generally attributed to organisational level concerns (this is considered below). It is therefore maintained that the relative effect of peer or higher level values on individual decision makers, particularly those who have been in post for a number of years, is not possible to predict with any confidence. For this reason it is contended that each LAHOS worker will exhibit particular opinions or behaviours and affect service outcomes to a greater or lesser extent, dependent on a wide number of specific internal and external factors.

Determination of eligibility for prevention services in many cases appeared straightforward insomuch as this tended to be prescribed at the departmental (or central) level. An illustrative example of this is the development of specified rules in terms of who is entitled to financial help to secure private rented accommodation, whereby local connection, and to a lesser extent priority need, were required to qualify. In respect of the latter only a third of the LAHOS
interviewed automatically provided both a rent in advance and bond to applicants with no identified vulnerability. However, in respect of two authorities, upfront rental costs were occasionally provided to non priority households in ‘special circumstances’. As what constituted ‘special circumstances’ tended to be based on the assessment of an individual officer (perhaps with the assistance of peers), the use of differentiation may come into play to gauge a service user’s ‘worthiness’ (Lipsky 1980, p109) of receiving limited funds. For example one interviewee felt that particular colleagues bestowed favourable treatment on households where they perceived similarities between the service user and themselves:

I think your personal experience and your personal situation does influence the way cases will stand out for you. I think some people with children can really empathise with other customers with children…it’s different things, different stories so as to speak, will hit, you know, will not appeal, but will have different weight to different advisers dependant on their situation (Officer One, LAHOS A)

One manager advised that some members of his team would be more likely to provide a good service to ‘nice’ people:

We have members of staff, softer members of staff who empathise a bit more with the wider picture and yet we have got others who are working with the law and being factual, saying, they done this and this, yes, they might be nice people, but they have done this, it is that side of the law therefore there is no duty owed and we do have, within the team, quite a split with those who are empathic and those who try and err in the favour (Manager, LAHOS C)

Turning to the concepts of culpability or suitability for services it was found that stereotypical frames of reference were evident in a number of the interviews. In respect of culpability an area viewed as important in terms of judging decisions was the perceived ‘truthfulness’ of a given service user, with many practitioners suggesting that households may unlawfully present as homeless in order to secure social housing (see below). Related to this some interviewees appeared to split service users into deserving and undeserving categories:

Some are willing to sort themselves out once they have got a few leads, pointers about what to do, and others sit back and ‘well, our family has always had council houses this is what we expect and that is what you are going to give me’ type of attitude, and they have never worked (Officer One, LAHOS H, emphasis added)
It was found that individual problems, such as particular health conditions, gave some officers cause to become wary of the account given by a service user. For example one decision maker related to how a previous experience assisted in forming a view of those who presented with personality disorders:

I remember one girl, I was in tears, it couldn’t have been that long ago, but she described her horrifying, well, she was lying actually, but she described a horrible situation which to do with a personality disorder and she said she had been, you know, by her dad, and uncle, it was really graphic. I mean, I had not long started and I didn’t know that people with personality disorder lied all the time for attention ... I was crying but then, after a few years, it is like, this might not be true (Officer, LAHOS J)

Alongside conditions or characteristics experienced at an individual level (the latter is discussed below when we concentrate on older service users) it was found that households who presented with fluid or transient circumstances may be met with suspicion. For example in respect of prison leavers, or those with a chaotic past, it was suggested that they needed to sometimes learn the hard way that they couldn’t spend rent money on alcohol or ‘doing what they want’:

It’s like, a kind of learning process, budgeting and all that, you know, you have to keep money aside, you can’t just keep spending it on alcohol and doing what you want to do (Manager, LAHOS L)

In line with findings touched upon in Chapter Three a few interviewees felt that young people who presented to services after being asked to leave home were likely to be colluding with family members:

It’s like with the family licence terminations, I think the guidance around that that we work to, I think it needs to be an awful lot harder for those people to get through, because it is like, they know, kids are a certain age, so we have to house them, yeah, I think we need to get a lot stricter on that (Officer Five, LAHOS B)

There is a certain, well, you shouldn’t regretfully say its collusion, but there is always this element of, well, have the family put them out as that is the only way that they see they will get a council house (Officer One, LAHOS H)

In a similar vein some interviewees advised that women fleeing domestic violence were ‘working the system’:

I have issues around domestic violence as we are finding that it’s a bit of a loophole for very chaotic people...we are not saying they don’t have domestic violence incidents, but
they are not fleeing the partner, they are wanting to remain with the partner but they know the housing system, and they know that if sometimes, if they are fleeing a property, which they are normally found intentional from, if they are fleeing they can get away with not being found intentional (Manager, LAHOS B)

I think we have the thought that lots of people can manipulate information and systems to get what they need in terms of homelessness and unfortunately sadly domestic abuse is a classic case of that because the threshold of evidence is so low (Manager, LAHOS L)

In each of the above quotes specific value judgements were made with regard to the type of person believed to be taking advantage of, or ‘clogging’ the system.

Welfare reform and the austerity climate
Keeping in mind Lipsky’s (1980) categorisations of client differentiation, this section focuses on how particular views regarding service users interacted with recent structural developments, with particular reference to welfare reform. Some interviewees felt that the overriding purpose of welfare changes was to encourage a cultural shift away from expecting ‘something for nothing’ or assuming that social housing was a ‘right’. For example when discussing how the Localism Act would be utilised in her authority one interviewee stated:

I think we would like to discharge into private maybe, don’t think there is the properties out there to do it with, we can say it to people though, I mean, people who might see homelessness as the route into council housing, we can explain that if they go down the homeless route they could just be offered private. To be fair that would probably put some people off, especially people in the parental home, it helps get away from that culture of expecting a council house... So yes, we might use it to give customers more realistic expectations (Manager, LAHOS B)

It was recognised that the required ‘cultural shift’ would not be unproblematic or smooth:

I would also say as well it is combating the culture now, because so many changes are coming through so quickly that the culture of the customers you are dealing with, they have not kept up with the changes (Manager, LAHOS B)

With regard to more general welfare cuts, although many interviewees were apprehensive with regard to the expected, or actual increased footfall that would result, a number agreed with what they perceived to be the principles guiding austerity measures. For example a few suggested that service users in some respects had perhaps had it too good for too long:
I also think that people should take a lot more responsibility for themselves, there is a lot which is what, I suppose, the government is trying to get people to do, there has been a lot of sitting back and ‘what is the state going to give me’, handout culture, which has got out of hand, you have got to have provision for people, but at the same time, they need to be more self reliant (Officer One, LAHOS H)

Alongside the view that expectations needed to change was that policy designed to encourage greater responsibility, such as universal credit, was likely to further impinge on LAHOSs due to an increase in households who would become homeless as a result. Some practitioners held a negative view of service users ability to manage money, with a few stating that when universal credit is rolled out and social rent becomes the responsibility of tenants, this would likely result in due rent not being paid in some cases. One interviewee took a sympathetic view, arguing that service users had not been trained in money management and may struggle to prioritise if they have debt:

If somebody for 30 years has never had to manage their finances, or pay any money, or take responsibility for anything, how then therefore, when they come with a [notice from an assured shorthold tenancy] or whatever from whichever housing provider can you say that they have done that with intent if they haven’t been educated, or trained to do it. I think a lot of the authorities will find it as very black and white, but I’m sorry, ‘you haven’t paid it, so your intentionally homeless’ but I can’t see how you can do that when you have got a generation or two generations of people that have never had to take responsibility for their lives (Manager, LAHOS I)

Yet others suggested that the behaviours leading toward non payment of rent would be more wilful:

If they allow direct payments then it shouldn’t be too bad but if they say ‘alright there is £1000’, people just don’t know how to manage that kind of money and when Christmas comes and things like that where is the £1000 going to go? (Officer Four, LAHOS I)

When we all had the first bit of training on the fact that everyone was going to have this universal credit and their rent was going to be included in this one off payment once a month, we just cringed, because people don’t pay their rent now, let alone giving it to them in one lump sum once a month, and they are going to think, oh great, a wad of money, let’s go out and spend it, and then realise that they haven’t paid their rent (Officer Five, LAHOS B)
In a few cases the ‘Big Society’ agenda was conflated with austerity (which as highlighted in Chapter Two, is also evident in scholarly critiques) and referred to in order to qualify arguments in support of the latter’s perceived principles:

Big Society is just making people, making the country get off its backside I think, and not become a hanger on the welfare state, half the country, you know think they can have a good life on benefits and it’s about stopping that... he’s probably gone a little too deep too fast, but he’s doing the right thing at the end of the day (Officer Four, LAHOS I)

On a related note one interviewee felt the Big Society referred directly to individual responsibility:

It’s a big culture shock really, people who are under 35 now realise they are sharing a home, in most cases with people who are strangers really, I think that is a big culture shock. I guess and I remember this thing on the telly, there was this whole thing about well, you know, maybe people should stay home, you know, can’t afford to live out there on the home and they don’t want to share a house. Well, perhaps they should stay home, with mum and dad a lot longer, I guess that comes back to the big society thing, really, helping yourself (Officer One, LAHOS A)

Connected to the view that a specific ‘culture’ underpinned certain users of the service was a belief held that homelessness was in fact a choice for some groups:

Welfare, it’s in need of a complete overhaul there has been a lot of people using the system not necessarily fraudulently but as a lifestyle choice, and change is needed (Officer One, LAHOS H)

Priority need is a difficult one, I think they [the staff] do struggle sometimes and with the fact that when a customer will move into something unaffordable from the beginning and they have moved into it, knowing its unaffordable and then they can’t pay the rent, and then we acknowledge a duty to them. I think they struggle with things like that and they might think that sometimes that, the customers have done things on purpose and then we are obviously picking them up (Manager, LAHOS E)

These findings offer an applied understanding of the perceived causes of homelessness, highlighting the interplay between individual behaviour and structural changes. Whilst a number of officers acknowledged the link between structural reforms and the increased risk of households becoming homeless, the individual actions of those self same households were in some cases held to account, and viewed as triggering the political action which led to the current austere political climate. It further shows how these factors may direct particular assessments or
outcomes in practice. For example if it is assessed that homelessness occurred as the result of a deliberate act it may increase the likelihood of an intentional decision, or suspected service users may be unable to access discretionary services.

**Differentiation and older people**

This section considers the concepts of eligibility, culpability, suitability and the use of categorisation in respect of older people. As stressed in the opening paragraph, older people may be subject to negative stereotypes or bias by dint of specific circumstances, such as suffering from particular health problems or fleeing domestic violence. They may further find themselves in housing difficulty due to the harsh austerity agenda and thus be subject to the attitudes discussed above. However, this section is more concerned with differentiation due primarily as a result of someone’s status as an ‘older person’.

In the previous chapter it was suggested that an officer’s conceptualisation of older people would be influenced by the individual caseworker’s own experiences. Although at initial glance the views held by individual decision makers may be assessed as having limited impact on service provision, it is countered that over a wider scale and in the longer term these conceptualisations will shape both the quality of advice and availability of specialised initiatives. For example if the housing needs of the ‘younger old’ are ignored or conflated with the ‘oldest old’, whereby housing problems are perceived as being related to care or support needs (as reported by some interviewees) this could potentially have a bearing on the availability of emergency housing for this group. This is an important consideration in light of findings discussed in the previous chapter that hostels tended to be designed with younger people in mind.

Research discussed in Chapter Three found that in many cases older people were reluctant to approach LAHOSs due to a lack of awareness or belief that it was for younger people or families. A minority of interviewees suggested that older people did not present as frequently as other groups; when asked to disclose potential reasons for this one suggested there were perhaps more options available, another felt it was due to an increase in extra care schemes, which of course, is more applicable to frail older people (see below). One practitioner felt that older people presented less due to a greater level of independence:

Yes, we get a few, but I think, there are fewer certainly and I think that might be because they are more resourceful (Officer One, LAHOS A)
However, for the most part interviewees did not share the view that older people were more self sufficient, particularly when asked why people over 50 tended to approach LAHOSs for help:

I think older people are really quite vulnerable, they are quite vulnerable and any kind of move is kind of traumatic isn’t it, do you know what I mean, especially if they have been in a long term marriage or whatever and then they are on their own, it’s a huge kind of transition for them to kind of adapt to that new way of life isn’t it (Manager, LAHOS L)

It tends to be relationship breakdown, you know, which is a shame after 25 years of marriage, I have dealt with a couple recently and what you tend to find with the older people is that you obviously, they obviously haven’t had the experience with the technology that we have so this bidding thing on the computers it’s a tricky thing for them, but we certainly see a few over the age of 50, but it tends to be the relationship breakdown, not the, you know, the, younger type problems where they come with, like, criminal records and things like that (Officer Four, LAHOS I)

It is often people coming back to the town, you know people who have come back to retire or a relationship breakdown. And, you find that quite strange, as you think that after a certain age they will stay together, but we have had that, quite an increase in that, in my personal experience (Officer One, LAHOS I)

One officer assumed that an older person would not be responsible for dependents:

I would say it is different things, one of them has been asked to leave by relatives, unaffordable properties, relationship breakdowns obviously they haven’t got dependent children so they come, single (Officer Two, LAHOS E)

The inherent tone of the above citations is reminiscent of Ellis’s (2007) study in which older people were viewed by some as being reticent to change. This could potentially be a cause for concern, particularly as it was found that the older people in Ellis’s investigation were less likely to be offered a particular service due to this very assumption. Further, the latter quote assumes an older person will no longer have dependents, yet the number of women bearing children after the age of 45 has tripled in the UK (Lewis 2013) and annual live births in England and Wales by women over 40 had risen to nearly 30,000 by 2012 (Mothers 35 Plus 2013). Moreover, some older people may have caring responsibilities toward parents or grandchildren, which did not appear to be a consideration.
Following on from suggestions that older people were less able to cope with change, some officers attributed particular expectations to this group:

A lot of people when they come in at that age, they are often single homeless but especially over 45 kind of have this expectation that they should be able to get a council house, because they want to settle down, they kind of need to understand, but their faces completely drop when you tell them that private rented is their only option (Officer One, LAHOS B)

I think people sometimes think that because they have got past the age of 60, they think, I am past the age of 60, possibly they think I am automatically priority need, you think, no (Manager, LAHOS B)

It was also suggested that older people may be fussier than their younger counterparts:

They have got a few more options as we have got quite a lot of supported accommodation, sheltered accommodation, there are a lot more, its choosing the right words, as they are a bit more choosy for all the options are wider you spend more time trying to do that trying to convince them that it is the right scheme for them (Officer One, LAHOS I)

Alongside relationship breakdown it was found that some interviewees, as touched upon above, tended to view the term ‘older people’ as being synonymous with ‘frailty’ or the ‘oldest old’, despite the interviewer clarifying that questions were aimed at understanding services for people 50 or over. Subsequently a few suggested supported or specialist accommodation as potential housing options and failed to take into account healthy older people who may require general purpose accommodation. In a similar vein a few respondents focused on problems related to moving out of isolated rural areas or unsuitable properties and correspondingly assumed that older people could be ‘sorted out’ due to the existence of retirement, supported, or extra care accommodation. An apt illustration of this was the response given by one manager when asked what local services were available for older people who became at threat of homelessness:

We fund a handyman scheme... so they will do odd jobs and various things, I don’t think they go as far as garden maintenance, that’s the biggy, isn’t it, with older people, they just can’t manage their gardens... we have been talking about making it possible for people to stay in their own homes, changing the heating systems, making sure the properties are upgraded, all of that, I think a lot of people come to us as housing options maybe if the property is unsuitable or if too far away and they can’t drive and they really have nothing (Manager, LAHOS F)
However, the assumption that older people tended to experience housing problems due to relationship difficulties or housing suitability issues was not shared by all interviewees and a small number (albeit less than a handful) reported that this group were increasingly presenting with more complex issues relating to substance misuse or criminality:

The thing we are seeing an increase in, especially with older people that I am finding are the chaotic ones, and we have come across a lot with drug, especially drink issues, which are living in properties where they are absolutely diabolical because they are drinking and not looking after themselves, so we are finding an increase of that, chaotic lifestyles (Manager, LAHOS E)

In their 50s we have a few hard core street drinkers, they tend to be in their 50s, sometimes early 60s (Officer One, LAHOS G)

Views around the causes of homelessness among older people tended to focus on individual as opposed to structural reasons, eliciting a mixture of responses relating to care, support, relationship breakdown, and to a lesser extent, substance abuse. More generic factors such as those identified in Warnes and Crane’s (2006) study relating to rent arrears, eviction, harassment, debt, ill health or unemployment, were not provided as potential reasons for housing difficulty amongst older people (domestic violence, as seen in previous chapters, was also given limited attention). Whilst it is perhaps inevitable that practitioners will recount past experiences when advancing reasons for older people becoming affected by homelessness, it becomes less helpful if a given service user’s trajectory diverges from particular assumptions. Further, these finding are perhaps even a little surprising when considered alongside the fact that many interviewees acknowledged that conceptualisations of older age had changed over time, as highlighted in the previous chapter. Referring back to the critique of Anderson and Tulloch’s (2001) homeless pathway for people over 50, it is argued that ignoring current structural elements provides only a partial picture of why older groups experience housing difficulty and based on previous research findings, does not reflect reality. For example one interviewee suggested that older people would not be affected by the spare room subsidy (the so called bedroom tax). But in fact this is only true for people over retirement age and any other service user will suffer its consequences the same as all other affected households.

A presumption which may work to an older person’s advantage is that they are less likely to cause problems than their younger counterparts and therefore some housing schemes were reportedly reserved exclusively for older age groups:
We put the age restriction on [particular social housing accommodation] because there is an assumption that the older person is less likely to cause anti social behaviour (Manager, LAHOS C)

Of course the usual waiting lists and qualifying criteria will apply and again, this option may only help those who are in a position to wait for a suitable property and will be less suited to households who are imminently homeless. However, it is viewed as important to highlight where positive discrimination does exist, albeit for perhaps the wrong reasons. That is, the premise is based on a stereotypical view that older people are quiet, or less troublesome than younger cohorts.

On a final note, although the use of stereotypes is for the most part viewed as unconstructive, it must be borne in mind, as reiterated throughout this thesis that the needs of older people have been found to be qualitatively distinct to that of younger age groups. Therefore specialist assistance, such as the provision of tailored services or segregated emergency accommodation is viewed as necessary to ensure particular groups access services. So whilst it is important to give regard to the unique needs of older service users, this should be based on an appreciation of the heterogeneity within this population.

**Screening**

In order to maintain control (Lipsky 1976) and ration demand by ‘making systems financially or psychologically costly or irritating to use’ (Lipsky 1976, p206) it has been argued that street level bureaucracies adopt triage type queuing systems, screeners and similar tactics to ensure the environment for service users is as unpleasant as possible (Prottas 1979). All LAHOSs interviewed had adopted prioritising systems, which was viewed as necessary due to the sheer volume of service users and subsequent pressure on limited resources. For example one authority reported that they had been forced to ‘triage’ service users as appointments had stretched into three and a half weeks.

In respect of specific screening tactics all LAHOSs expected service users to use initial front desk or telephone services before they could see an officer, which meant that disclosure of initial information was provided in an open arena. It was further found that in some authorities housing options or even full homelessness interviews were undertaken in a public area. In two of the LAHOSs visited by the researcher, service users were overheard divulging
issues of a personal nature in a public booth (however, for the main part interviewee accounts were relied upon as in most cases the interviewer was led to a private area on arrival and therefore not in a position to witness frontline services). Prottas (1979) took a dim view of publicly held interviews, arguing that it was a deliberate ploy adopted by street level bureaucracies as a way of discouraging potential service users. The findings appeared to support this assertion as a few LAHOSs reported that screening had increased due to the tightening of resources. For instance one practitioner said that they had previously allowed service users directly into their offices, but this ceased due to an increase in footfall:

The customers used to always come straight up to us and see someone from housing options, but because they are anticipating more people through the doors they are going to [customer services] (Officer One, LAHOS G)

Another stated that in the near future service users would no longer be able to contact them directly by telephone, as a central department was to be set up which would field all calls:

At the moment we have all got a telephone number and everybody can contact us directly but it will all go through one number, and, you know, it can take 10-15 minutes to speak to somebody, you know, even smaller organisations, housing associations, you can be on the phone for a long long time (Officer One, LAHOS C)

One interviewee advised that his LAHOS had set up a telephone system outside the department and service users were required to use this so circumstances could be assessed prior to being granted entry:

We have got the core team and they provide a triage approach, there will be somebody on the phone all of the time, taking calls, even if people come physically to this building they will be put on a free phone downstairs and then they would speak to one of our advisers and he or she will determine the urgency, and if it is necessary to make an appointment, then they will make an appointment (Senior Manager, LAHOS D)

The previous chapter highlighted one particular authority that had handed parts of the LAHOS role to generic customer service advisers in an effort to limit demand. Yet despite introducing what was arguably an extra barrier, a representative of this particular authority did not feel they had gone far enough:
I think we need to be a bit more, like with social media and stuff I don’t think we utilise stuff like that as well as we could do, you know, to try and stop the customers from coming in and try to help themselves a little bit (Manager, LAHOS E)

Only one LAHOS department was looking to remove perceived frontline obstacles though this had not yet been put in place; again, this was due to a lack of resources:

We have just been doing some customer service for our restructure and the customers are saying they don’t like that [disclosing a housing problem in a reception area], they think it is too open and there is a risk of someone overhearing sensitive information... but in order to do that you are going to have to bump up the staff (Manager, LAHOS L)

In summary it was found that attempts to ration demand mainly operated at the initial point of contact. Running alongside or following this, service users may experience further barriers if they are initially viewed as eligible to complete a homeless application.

Gatekeeping
Although some of the main causations of gatekeeping practices have been covered, it is viewed as necessary to devote more space to it here due to the weight of research evidence pointing to its potentially deleterious effects on households at threat of homelessness:

All authorities gatekeep, and if they have told you they don’t they are lying to you, they have to because of the shortage of resources (Officer One, LAHOS J)

This opening quote epitomises the close link between gatekeeping actions and the perennial resource scarcity that endures within LAHOS departments, whilst emphasising the fact that it is judged as a negative action and thus may not be readily disclosed. Based on the literature it was expected that encouraging interviewees to open up and discuss gatekeeping practices would be problematic. The two main issues identified related firstly to the fact that gatekeeping for the most part constitutes an unlawful act and secondly, it conveys an undesirable outcome, that of preventing a household affected by homelessness from making a legal homeless application.

In line with the above it was found that interviewees within LAHOSs would at times provide contrasting accounts in response to questions around how their individual authority behaved.
For instance some interviewees would state that their department always telephoned neighbouring LAHOSs to advise they had sent a service user to present there, yet when the said authority were subsequently interviewed it was reported that this type of pre warning did not generally take place. Furthermore, where LAHOSs were specifically named as impeding homeless applications, it was found that on subsequently interviewing the said authority, the same charge was at times directed toward the accusing LAHOS. This was likely due to the unlawful or undesirable aspects of gatekeeping and perhaps explained why interviewees were more likely to provide anecdotal rather than first person accounts of the practice:

I think we have got it as tight as we can [reducing statutory homeless presentations], without gatekeeping, which we don’t want to get into... yes, there is a pit, jump into that; we don’t want to get into that, which I know that other authorities do (Manager, LAHOS K)

That said, some interviewees readily disclosed that they had resorted to gatekeeping and as shall be seen below, this tended to be viewed as being due to circumstances outside of the officer’s control.

A further example of divergent interviewee accounts was evident when employees of the same authority were asked if their LAHOS took statutory homelessness applications from households assessed as homeless within 28 days. Half of the decision makers claimed that a homeless application would be taken from anyone who fitted this criterion:

Obviously, if they are homeless within 28 days we would have to take a homeless application and then make a decision on it, and we have done that for a long time (Officer Three, LAHOS I)

Yet the other half refuted this, stating that homeless applications were not taken as a rule:

I don’t do so many homelessness cases as I should and I think that was picked up upon on a recent audit that we should really be doing them across the board all the time (Officer Four, LAHOS I)

Unless they come in and demand a homeless application we would do it as part and parcel of the housing advice case (Officer One, LAHOS I)

The manager of the above authority provided an apt illustration of the consequences of pressuring staff to reduce homeless presentations. She believed that central pressure had
caused their department to manipulate homeless figures by impeding statutory applications, which had erroneously represented the local area as having no problem. The manager had therefore taken the unusual move of instructing her staff to ‘reintroduce’ homeless applications, despite having an acute awareness of the probable negative impact a subsequent rise in statutory acceptances would have on her department:

This is only a thing we have started doing in the last few weeks [taking statutory homeless applications], literally...I have said, and someone else has said, ‘well, we should really do more homeless applications’... We have manipulated statistics over the years, for whatever reason and that worries me now, I don’t think the politicians, or even the senior members here see the true picture because of what they see in black and white (Manager, LAHOS I)

Yet only one member of staff interviewed at LAHOS I appeared to be aware of the required change in frontline operation (and the officer in question had not acted upon the new instructions). Furthermore, those who claimed that homeless applications were taken automatically stated this had always been the case, despite the manager’s claims to the contrary, as cited above. This provides an illustration of where supervisory pressure was insufficient to alter frontline behaviour and further highlights the difficulty in successfully scrutinising staff behaviour when it involves actions such as gatekeeping, as there is no official application or decision to monitor. It moreover demonstrates how the deep rooted, ongoing political objective to keep statutory acceptances low may override the will of a supervisor; this important discussion is returned to in Chapter Eight.

The manager of LAHOS I was the only statutory interviewee who expressed any concern regarding the misrepresentation of homeless figures due to the impact of prevention work and in fact, some LAHOSs aimed to push officers further in the future. For instance one department had introduced a new system which would be able to track the prevention numbers of each caseworker:

We have just got a new computer system in, that is going to mean that this year for the first time we are going to be able to monitor [homeless preventions] per officer, so it will be interesting to find out if officer A does 100 cases, and officer B does 100 cases what is the split, I mean, people can be unlucky and get a run of really difficult heavy duty cases but we are going to be able to look and see, to be able to try and make sure that we hit the target (Manager, LAHOS K)
This draws attention to the twofold pressure of being provided with set objectives alongside the knowledge that individual performances are being monitored.

**Which factors increased the likelihood of gatekeeping practices?**

As referred to earlier, the exercise of gatekeeping was adopted mainly in response to target driven environments, which cannot be separated from the resource shortages which underpin it:

I would be lying if I hadn’t seen in the many years I have worked in this area and worked alongside people doing this job, I have seen this authority pack other people off before...I know people who have come here for advice and been told you would be better off jumping on a train and going to blah, so, it does happen, and it is going to cause tensions...(Interviewer: so why does it go on) maybe the pressures of keeping your particular homeless numbers down, your budgets, certainly the pressures on temporary accommodation (Officer Four, LAHOS B)

As highlighted previously, the need to ensure statutory homeless applications remained low was stated as a principal goal by a number of interviewees. In the account given below a manager refers to a LAHOS who placed a household in emergency accommodation but nevertheless failed to acknowledge it as a legal homeless presentation, believing it to be for this reason:

It’s very annoying, when you have somebody that comes to you that’s been in a temporary B&B and the authority says that they haven’t taken a homeless presentation, why have you placed him in the B&B in the first place? And you have just got out of the fact that you are saying you haven’t taken a presentation, when in fact when you have placed them you have started the process, and we get a lot of that (Manager, LAHOS B)

While the manager expressed frustration at this type of gatekeeping behaviour, she then went on to suggest this would be more justified if the authority had ‘not’ placed the household in temporary accommodation:

Local connection its one of those and you have to think both ways, if you have somebody come to you who fit the criteria but you have no temporary accommodation for them that day, you would, for the customers sake say, you are just going to waste your time, go and present to the authority that you want to be in (Manager, LAHOS B)
In summary it was being suggested that some types of gatekeeping may be more justifiable than others (this issue is returned to in the next chapter).

The evidence found in the survey and discussed in previous chapters suggested that non vulnerable households were more likely to receive limited assistance due to resources being concentrated on priority need groups whom the authority has a legal duty to accommodate. The interview findings supported this:

I sometimes feel that we are a bit rigid, when it comes to homelessness applications, obviously we have got to be, we have got to operate within legislation, but, you do sometimes end up concentrating your efforts on those who we owe a duty too, whereas other people, who we don’t owe a duty to, although we try to, you know, assist as much as we can, they tend to fall by the wayside I think (Officer Two, LAHOS B)

We are probably much more flexible than other authorities, other authorities would probably just send them [non priority prison leavers] away, and say, here is a list of B&B’s and hostels (Manager, LAHOS L)

The above excerpts draw attention yet again to the fact that scarcity of supply underpins much rationing behaviour. Although legally non priority groups are entitled to advice and assistance, the limits to this are not clearly laid out in legislation. Therefore, though it could be argued that sending someone away with a generic list does not take the duty far enough, it would be difficult to show that it constituted unlawful behaviour per se.

It was found that those who did not appear to meet all five homeless tests on initial assessment were particularly susceptible to gatekeeping, but this was not a necessary requisite. For example a few practitioners suggested that they would require evidence prior to taking an application or placing in emergency accommodation if it was believed an applicant may fall into a priority need category, despite this practice being unlawful:

When it comes to temporary accommodation for borderline priorities, well you have to provide them with the accommodation and then make a decision, and I think some authorities do get away with not doing that, whereas looking at it on the face of it is if there is a reason to believe that someone is mentally ill, don’t wait until they have provided the paperwork, that is up to you to find that out, provide them with somewhere whilst you make your enquiries that’s what the law says, but I know for a fact that certain areas just send them away ‘you are not getting anything’ (Officer, LAHOS H)
Other officers further reported that colleagues did not sufficiently investigate priority need and would assess that their department owed no duty incorrectly:

I look for if a person has so many issues, if they have got a number of issues they may be seen as priority whereas other members of staff they might think, ‘ah well, there is nothing striking you in the face’, they don’t look at the separate parts of it, so if they have been in prison, if they have a history of drugs rather than saying, possible priority, they wouldn’t explore that enough (Officer One, LAHOS E)

Moreover, households suspected of being intentionally homeless or lacking a local connection (in addition to those deemed to have no priority) would in some cases be discouraged from making a homeless application due to the probability of a negative outcome:

Initially when people started the job they were, there was a lot of pressure on them from up high to say we don’t want to give these people housing, there isn’t enough to go around, if you think there is intentionality or someone isn’t priority need you need to be pushing that through, which, you could argue should be more so now in the recession and there is less public money going about (Officer Six, LAHOS B)

The latter part of this quote again links resource scarcity to gatekeeping practices and further suggests that this is a behaviour which is ingrained during the initialisation process of the role. It also indicates that particular households, such as those fleeing domestic violence, referred to in the previous chapter, may be more susceptible to gatekeeping as in some cases their motive for presenting to LAHOSs was questioned.

As covered in Chapter One and touched upon above, local connection is the final statutory homelessness test and is not a lawful reason to refuse an application. Yet the use of the local connection rule to justify gatekeeping behaviour was cited on a number of occasions:

I have worked with, or witnessed some really shocking practices, it tends to be that you get to hear about it through your customer, so for example I took a phone call the other day, of a women who wanted to make a presentation to a particular authority, but she was told to ring us, she did have a local connection to that authority, she rang, though she didn’t need it, as she was fleeing domestic violence anyway, but she wasn’t given that information, she wasn’t told, and she wanted to live in that area, she didn’t want to live in the area that she was living in, so that’s pretty bad (Officer Two, LAHOS B)
Sending people away due to a lack of local connection was also remarked to be as a result of inadequate staffing within any given authority, which one practitioner advised had worsened in recent years:

Yes everybody does [turns away service users on the premise that they have no local connection]...now people are more short staffed and I honestly think people are saying, just send them over...without doing the ‘S198 referral’ [official form when completing a referral to another authority] (Officer, LAHOS J)

Associated with poor workforce levels, time issues were also viewed as a significant factor:

[You do not] ever really feel like you’re able to make decisions in kind of a way that you want to because you kind of feel pressured, and you don’t get the time to reflect properly (Officer Two, LAHOS B)

People are being sent away if they haven’t got local connection (Interviewer: why do you think it happens). Workloads I think, because we are all busy and we are quite a small team really, especially when there is leave, it is just people’s workloads and it’s like, oh, it’s just going to be another case, another presentation and I think if they can offload them onto another local authority then they do it (Officer Five, LAHOS B)

**Gatekeeping due to lack of temporary accommodation**

An important element of rationing was the need to limit demand due to the intense pressures on temporary accommodation. The use of gatekeeping to protect emergency housing appeared to be ubiquitous and nearly all LAHOSs interviewed had either witnessed or carried it out themselves. Further, any one of the tactics identified above, such as requiring additional information or advising households that they would not meet the threshold of vulnerability, non intentionality or local connection may be utilised for this purpose. As highlighted at the start of this chapter, interviewees were more likely to recall instances where a neighbouring LAHOS had illegally sent a household away due to a lack of temporary accommodation:

Frequently people don’t get much further than where have you been living, and ‘off you go then back there’, you know, the whole thing isn’t gone into...I have argued with a couple of authorities in the past regarding domestic abuse, because although we have done an entire investigation and decided yes, they are at risk here they have not wanted to take them because they have got a better connection here and you really shouldn’t be doing that with domestic abuse, yeah, so I have had a couple of arguments in the past about that one (Manager, LAHOS F)
Although anecdotal accounts were more common, decision makers reported this in respect of their own authority, directly linking scarce accommodation resources to more negative assessment procedures:

Which is one of the real bugbears of my job you know [pressures to keep temporary accommodation use low], as even when you are taking a case on, and we have an obligation to provide temporary accommodation we are often told as workers, well, we don’t have any, and you are just left with it, you know, you are left trying to explain that to a customer that you have got a statutory duty to provide accommodation for so I think probably one of the main reasons that it [gatekeeping] goes on...is the pressures on temporary accommodation (Officer Four, LAHOS B)

You are going to have to accommodate while you make that decision, you put them into your temporary accommodation to then send them back to their own area, so I suppose it is, because we do have a lot of pressure regarding temporary accommodation (Officer Two, LAHOS E)

I think you feel more pressure in potentially homeless, you are trying to not let them make a presentation, simply because we don’t have enough temporary accommodation to meet the needs, you tend to prioritise those cases...I have got into a situation where I am turning around and saying to people, your priority need, you fit the criteria, go away, I have got nothing for you (Manager, LAHOS B)

It further appeared that sourcing temporary accommodation outside of the local area could be used as a kind of gatekeeping mechanism, which is of particular concern in light of findings discussed in Chapter Two that this is becoming increasingly prevalent. For example one authority stated that their emergency spaces were over 20 miles away, in a different area, and in a place that service users did not trust as it was away from kin. Because of the unsuitability of this accommodation it was disclosed that service users were more likely to sofa surf or impinge upon others for somewhere to stay.

Interviewees in two LAHOSs reported that they would allow an applicant to be ‘homeless at home’ pending the availability of suitable accommodation, but most suggested the ball would only start rolling if they had to place in temporary housing. However, in three authorities no hostels or equivalent were available in their area and in respect of two of these, officers were forced to use B&B if someone needed to be placed as an emergency. In one of these cases a practitioner reported that officers had been taught not to allow people access to emergency accommodation for the simple reason that they did not have it:
Because there is not an awful lot [of temporary accommodation] I think we have kind of, as a team, almost trained ourselves at being really good at not having to use temporary accommodation unless it is completely, absolutely necessary (Officer Four, LAHOS I)

In summary gatekeeping could be attributed mainly to meso and macro level determinants, which supported the findings discussed in previous chapters. The sense of inevitability and relative powerlessness which emanated from negative actions being taken due to centrally set priorities was subsequently expressed with frustration and anger by some interviewees, the latter of which is captured well in the following quotation:

It is an absolute joke, and anyone in the team would say that and we just feel it’s us dropped upon as well, because we are the ones saying to the customer with three kids ‘you’re going to have to find friends to stay with’ or ‘I’m sorry, you might have to sleep rough’ or blah de blah de blah, I mean, it’s an absolute joke (Officer One, LAHOS B)

Although central intervention is required to tackle gatekeeping practices (and is considered in the conclusion), non statutory legal help organisations also provide a valuable tool for service users denied adequate assistance and this is now turned to.

**Non statutory legal help organisations**
The previous chapter discussed scrutiny of the LAHOS role, but focused primarily on the influence exerted by endogenous factors or Central Government. This section considers the role of non statutory organisations who challenge decisions from the perspective of LAHOS interview respondents and a small selection of TSO professionals. As outlined in Chapter Three service users can access legal recourse to challenge negative or unlawful decisions, which may be dependent on income and availability in the local area. This can include private organisations who have secured LSC funding or, as is the chief focus of this section, TSO’s who employ housing specialists. This is generally funded via a mix of the Legal Service Commission or charitable monies. While it was found that LAHOS practitioners did not generally discriminate between private and TSO’s when discussing legal challenges, differences were identified in a few areas and these are highlighted where appropriate.

It was discussed earlier that many service users will have a limited understanding of the Housing Act and subsequent decisions made on the strength of this; as a result they may not
pursue a negative decision without assistance from a third party. Yet it was suggested by one LAHOS officer that external challenges were an important way to counteract the effects of divergent assessments between individual officers:

I guess what you hope for is that the review process kind of underpins that and kind of makes sure that people will get a consistent service, because the reviews will get looked at by other people not ourselves, so that kind of protects that (Officer Two, LAHOS B)

All bar one LAHOS in the interview sample reported that legal representation was theoretically available for service users, although a few smaller authorities stated that households may need to access this in neighbouring areas. While some LAHOS interviewees reported a reduction of non statutory legal representation in their area, only a few made specific reference to legal aid cuts. One officer advised that she had come across service users who were no longer able to access help, referring not just to advice around homelessness per se, but also assistance around family law disputes or property rights following incidents of domestic violence, which can all potentially lead to homelessness. Yet it was suggested by a TSO representative that provision was likely to progressively worsen:

I think everybody [LSC funded organisations] is looking for a new, a new big funder because legal aid has just been seen as not terribly viable... they are always looking at ways to cut legal aid and at the moment even on the cases that we have got legal aid on they are much much stricter...So legal aid funding is I think not seen as viable, people desperately want to get rid of it and not have to rely on it but there is just no, there is no sound alternative. I mean, the fact that [the TSO] have put this money in, is great and I think [the TSO] are looking at ways to get more donations... and get more steady income to keep these voluntary funded places going, but, who knows where that will go, I don’t think any of us feel that we have got job security really (Adviser B)

This lack of funding, at least in the case of the TSO interviewed, seemed to reproduce practices reminiscent of the screening discussed above in respect of LAHOSs:

For people who are not eligible for legal help (LSC funding) then what we do at the moment is we do operate a drop in system and we do take appointments on a week by week basis, cos we used to be booked up five, six weeks in advance...what we do is, it sounds like a doctors surgery, it sounds weird, but actually it seems to work, they ring up on the Monday for the appointments that week then once they are full up we just tell people to ring back next week, what we do, if they are, for example let’s say they are street homeless then we would always refer them on to our legal advice it’s like a telephone advice line who can give advice over the phone...it is just managing capacity within the office (Adviser A)
This ‘triage’ type prioritising system for appointments was assessed as being due to necessity, which again, was underpinned by a lack of resources.

Statutory attitudes toward legal help representatives

It was suggested by one of the TSO interviewees that some statutory practitioners had a limited comprehension of the role they undertook:

I think that often they don’t understand our roles, they picked up on me challenging them and they almost made a complaint about me for challenging them, saying hang on a minute, we are supposed to have a really good working relationship here and I have to say to them, well, you broke the law (Adviser C)

The LAHOS interviewees view of organisations who challenged homelessness decisions was mixed, with some suggesting that defending judgements took up too much time. For example in an authority where 40% of the statutory decisions made were overturned by a legal organisation the manager suggested time could be better spent on other duties:

We have also got a very active solicitor who quite willingly throws requests in and yet, the responses to their reviews in the time I have been here are on a 60 40 in our favour which does show that we are making the right decisions, but we are having to invest more time and energy into a review process, which, if we are on a 60 40 our way it shows we are making the right ones, so therefore we are wasting a resource really (Manager, LAHOS C)

Although the decisions were undoubtedly in favour of the LAHOS overall, the interviewee in question did not give due consideration to the two fifths of occasions in which advice organisations were successful, or what would become of those said households if they had not had access to legal recourse.

A few other interviewees further felt that some organisations would abuse their position by giving service users ‘false hope’:

It seems to get the customers hopes up where clearly, there is no, well, perhaps it is never clear, but, getting peoples hopes up always seems to be a thing... it seems to be, yes you can review a decision you might as well, whether that is a financial gain from the legal aid side of things I don’t know, but it does seems to be happening more often and I do think it sometimes puts a spanner in the works but I am biased as a local authority officer (Officer Six, LAHOS B)
When interviewees named organisations that they believed would challenge for monetary gain with no real chance of success, this tended to be directed toward private organisations with an LSC contract; overall, the intention of TSO’s were viewed as more principled.

While there were some negative remarks surrounding the work of legal representatives, a few interviewees also identified positive elements, reporting that they were professional, skilled and fair. These more constructive comments were directed at TSO’s and not expressed with regard to the minority of private LSC contract holders (although it cannot be inferred from this that private organisations were not viewed this way, as a direct question relating to their efficacy was not asked). For example one interviewee referred to a TSO who would get in touch and informally discuss cases, in an attempt to resolve the situation amicably and may not pursue further on the basis of information provided by the statutory officer:

There are some that are better, because they are very realistic and they will ring you up for the background of why you have made a decision, and those ones tend to be the ones who say, right, fair enough I understand what you are saying, I will work with the customer (Manager, LAHOS B)

Finally, despite the comment cited by the TSO officer above, most authorities claimed they understood the role of the non statutory housing sector and all stated that they would provide information on where to seek legal advice in the event of issuing a negative decision. However, if gatekeeping occurs, no legal decision is reached so though advice organisations can challenge this, a service user is less likely to be informed of their right to do so.

**Why is non statutory legal representation important?**

As highlighted earlier, most LAHOS interviewees reported instances of gatekeeping; in summary, the main practices involved unlawfully sending away service user’s who presented with no local connection, illegally requesting evidence prior to placing in temporary accommodation, or advising service users against making a homeless presentation on the basis that they were likely to be found intentionally homeless or not vulnerable. It was further identified that gatekeeping behaviour may be exacerbated dependent on the circumstances of a particular authority, or those of the individual service user.

It was found that organisations which offered legal help could counteract some of the main effects associated with gatekeeping. For instance in the example referred to in the previous
chapter of a manager advising staff to refuse homeless applications, one household sought legal advice in order to ensure they did so. Another practitioner advised that she was more likely to take a homeless application if service users approached with a TSO advocate. The third sector interviewees all confirmed that the most common reason service users sought advice was due to gatekeeping:

The main ones are gatekeeping, we do get... there is an awful lot of gatekeeping, an awful lot...we also have people who are quite clearly owed a duty and then they get, they have gatekeeping, either by them not accepting a homeless application or by perhaps taking a homeless application but perhaps not providing them with temporary accommodation (Adviser C)

It was further advised that if a service user approached the TSO following an act of gatekeeping in most cases a simple phone call warning that a legal adviser had become involved was a sufficient way to ensure the LAHOS in question carried out their duty:

If people come in here, and it just takes a quick phone call and they [LAHOSs] will do what they should have done because they know they shouldn’t have done what they did but, if, if they do that to four people and only one of them comes into ... then they only need to back down on one (Adviser A)

This excerpt makes the important point that some forms of gatekeeping will continue unchecked as many service users will not seek advice in the event of being refused a homeless application. The literature discussed in Chapter Three suggested this was due to factors relating to comprehension of the legality of a decision or a lack of awareness of the existence of legal help organisations.

Following the findings discussed in the previous section, it was suggested by a TSO adviser that gatekeeping occurred due to a pressure to prevent homelessness where possible:

I think there is definitely a pressure on them [LAHOS decision makers] to get homeless acceptances down and the other thing they do around here is they have a great deal of, everybody has got, authorities have got these homeless prevention teams now, and what I always think they are doing is trying to, if they can, they get someone coming in, they manage to get them into a hostel and then they say oh that is a long term hostel place so you are not homeless anymore and the person will say, well I never wanted a hostel place. But they will note that down as a successful homeless prevention case and it won’t go through the homeless statistics at all and the person won’t have the foggiest
idea that they didn’t have to accept that and that they could have insisted on a homeless application (Adviser B)

This excerpt draws further attention to the point that service users may only be in a position to challenge provision with the assistance of a third party:

I have, not quite so much here but in London I did hear a few times people sort of telling me off the record that they were under pressure to make negative decisions so, they prepared their decisions and they would give it to the supervisor and the supervisor would knock them back and say, you need to change that. I am sure there are very genuine pressures on them, you can understand where they are coming from and why they are trying to do what they do, but, it doesn’t change the fact that some of the decisions aren’t lawful (Adviser C)

This citation emphasises that level of resources must not be allowed to reflect the service offered. Both the above quotes show a level of empathy in respect of the challenges that LAHOSs face and return to the influence supervisory staff may have on the practice of gatekeeping.

In line with the discussion above, the TSO advisers stated that local connection was the most commonly reported form of gatekeeping and further, reported that the LAHOSs in their catchment area operated a regional level agreement regarding local connection which was in fact unlawful:

We get quite a lot of local connection problems don’t we [other advisers - yes] where we might have kind of people saying ‘oh well, I have been to..., but you know I have been told that I need to go back to... to present instead’ and ... and ...will say the same thing because they kind of have a service level agreement between themselves so if someone presents they will go back there, where as we are always saying, well we don’t really care what your service level agreement says, obviously by law that person can present wherever they want to present (Adviser C)

When asked why the test of local connection was applied when service users initially approached despite it forming the final homelessness test, it was suggested that this was deliberate:

They really do it on purpose, they kind of ask about local connection first rather than after all the other tests, and they, often their questions are limited to, where was your last accommodation and if it was in a different local authority they say, you have to go back there. They don’t ask any more questions... so you ring them up and say, this
person has come to see me, we are going to send them back to [the LAHOS] we would like you to take a homeless application, they do have a local connection although you know you clearly shouldn’t have asked that to begin with and they say, oh yes, no problem (Adviser A)

But it was also reported that genuine misappropriations of the law occurred:

There is also, I mean, there is some lack of knowledge of the law I have to say... I think quite a lot of it is deliberate and some of it is really not, it’s just a complete misunderstanding of the law (Adviser B)

I don’t think they really go into the caselaw there is never any, no-one ever considers mentioning the Code of Guidance, if they do apply the law then they don’t say how they have applied it and quite often you will read through it and, well, they make it quite easy to challenge them, even if, even if actually there is nothing wrong with their decision if they haven’t given reasons for it (Adviser C)

Attributing the illegitimate exercise of discretion to a mixture of genuine and deliberate causations reflects the literature and interview findings. In respect of the former, researchers highlighted in Chapter Three suggested that a more comprehensive grasp of housing policy may assist in ensuring practitioners were less likely to engage in unlawful gatekeeping, but both the survey and interview findings confirmed that regular training and updates, though vital, were for the most part inadequate and failed to take into account individual drivers or higher level pressures; this is returned to in the final chapters.

A further crucial consideration, which also returns to earlier arguments around acknowledging individual values was the suggestion by TSO officers that the quality of decisions are dependent, to a certain extent, on particular decision makers:

They are quite well reasoned, some of the decisions I have seen in terms of intentionality and priority need, it really depends on who you get. I have had some quite outrageous ones (Adviser A)

I think some are more conscientious than others and some are more interested than others (Adviser C)

It was found that some authorities reported several legal challenges and others only a few and this was related to the number of non statutory organisations in a given area. For example one LAHOS manager recalled how legal opposition to negative decisions went from being frequent to ceasing altogether when a charitable organisation lost funding. The suggestion
that legal challenges may be positively correlated with the number of non statutory organisations in the area, coupled with the fact that the proportion of negative decisions successfully challenged ranged from 40 to 50% where numbers were provided by LAHOSs, show that the loss of non statutory services in a given area will have a negative impact on particular service users. It is further argued that the mere threat of legal non statutory involvement may direct decision making. For instance a few LAHOS interviewees, generally employed in smaller authorities, suggested that assessments may be guided by the pressures felt from non statutory legal organisations:

If we are challenged on that, we will just have to backtrack and do what is required...there is a phone call and depending on how persuasive they are...we can be forced into a position (Officer One, LAHOS H)

Moreover, some practitioners admitted that the fact a service user had sought legal advice in the first place made them more mindful of final decisions given. For instance one practitioner advised that they had never had a case taken to court and pondered whether this was due to fear on the part of the authority. In other words, were they too willing to back out of a negative decision if it was subsequently challenged?

In another LAHOS a new TSO had been set up and a few practitioners stated that they would now need to be extra vigilant:

Well we will have to be on the ball a bit more, I think, just ensure that we are doing things correctly and thoroughly and right...because there is nothing here, it is just kind of, yeah, it’s been okay for now, we expect that to change a little bit now though (Officer Three, LAHOS I)

The findings relating to both LAHOS and TSO professionals emphasise that legal representation can make a significant difference to households affected by homelessness and when asked what the likely outcome would be if it ceased to exist one TSO adviser responded:

I just assume it would, put even more focus on housing options stroke homelessness prevention officers rather than have any other homeless service, they would push them down other routes instead, obviously it would be a massive injustice if we weren’t here to challenge them (Adviser A)
In other words it was argued that gatekeeping practices would increase without effective legal challenge, therefore the reduction in funding to provide legal help highlighted in Chapter Three is of great concern.

**Conclusion**

Adopting themes from Lipsky’s SLB framework to analyse LAHOSs relationship to service users has provided an enhanced understanding of the reasons divergent and even unlawful decisions are made in the course of implementing policy. Interviewees reported that service users would experience differing outcomes based on their ‘category’ of circumstances, which linked in with higher level matters such as central targets or local resource levels. Perhaps of greatest concern was the evidence provided by both LAHOSs and third sector interviewees that gatekeeping was ubiquitous, ingrained within the culture of a typical LAHOS department where limiting statutory homelessness had become the chief aim. Alongside the risk of experiencing differentiated service by dint of specific circumstances, such as fleeing domestic violence, older people were at times subject to narrow, age specific stereotypes which underplayed the complex array of circumstances which may cause housing difficulty for this group.

The next chapter draws together the relevant findings from the fieldwork, focusing on how the SLB perspective has contributed to an understanding of statutory homelessness implementation. It questions the capability and perhaps most importantly, the desire of policy makers and frontline policy implementers to engage in affirmative action to ensure fairer decision making.
CHAPTER EIGHT

The Street Level Bureaucrat in Local Authority Housing Option Services

Introduction

This chapter discusses the relevant findings from the literature and fieldwork, linking back to the main research questions. It will firstly critically assess relevant research which has engaged with the SLB perspective, relating this to LAHOS policy implementation. It will then outline where Lipsky’s SLB provided a useful explanatory framework of the mechanisms which may impact upon frontline delivery of housing advice and homelessness services. It draws chiefly on findings which connected specific coping mechanisms, which have increased in the current austere climate, to the exercise of (chiefly negative) discretion. This is considered in broad terms prior to a more specific focus on older service users. Before these topics are discussed the reader is reminded of the questions this thesis aimed to answer:

1. Can Lipsky’s SLB conceptual framework offer an effective tool to help understand the exercise of discretion in LAHOSs, principally its negative employment?
2. Can the SLB framework assist in comprehending variation in service delivery, such as the allocation of resources, interpretation of legislation and service user differentiation, with a focus on older people affected by homelessness?
3. With particular reference to older people, in what ways may the current political context, principally relating to welfare reform and austerity measures, impact on LAHOS delivery? What has this meant for established role objectives, such as the requirement to limit statutory homelessness and temporary accommodation use?
4. How do LAHOSs perceive their role in delivering political objectives relating to homelessness? What internal or external constraints do they identify and in what ways can these be overcome or improved?

Conceptualisation of a Street Level Bureaucrat

The purpose of the next few sections is to discuss topic areas chiefly relating to research question’s One and Two. The literature covered in Chapter Two showed that the main principles of the original SLB framework persisted in public services, though many
researchers injected particular caveats to better reflect conclusions drawn from a range of research settings. For example some commentators found that Lipsky’s representation of public sector workers as one, homogenous entity did not generally reflect reality, as it failed to uncover the wide variation in frontline delivery dynamics due to a complex interplay of individual and higher level factors. Moreover, some analysts pointed out that these factors were also fluid over time and space and dependent on a given political landscape. Lipsky was thus charged with paying insufficient regard to the fact that SLB’s are heterogenic and would not necessarily behave in predetermined ways (Evans 2010; Yates 1982). In further support of these arguments it was found that the LAHOSs who participated in this research operated in different ways, with at times incongruous aims, targets and objectives, inconsistent service levels and divergent decision making processes. Alongside this frontline delivery priorities and mechanisms were found to have changed over the last decade.

Yet as stressed in Chapter Two, Lipsky (1980) accepted that practitioners, and by extension public sector departments, differed at the micro level. But he intimated that an effective framework would have been difficult to develop without taking a wider view. In other words, taken to its logical conclusion, a more individualistic focus becomes effectively meaningless due to the potentially limitless variables this will inevitably generate. With this in mind the fieldwork expected divergent patterns to emerge, but due to one of this thesis’s aims of questioning policy effectiveness, it was considered essential to concentrate on what factors appeared to increase the likelihood of particular actions. Concluding that officers held different values, though an interesting finding on a descriptive level, does little to explain how those values may be assimilated based on organisational directives. For example the overriding pressure to reduce statutory homelessness acceptances was found, at the broader level, to encourage gatekeeping practices. But this did not necessarily mean that all interviewees had exhibited this behaviour in the same way or to the same extent. What is assessed as important is to consider what determinants appear to cause the act and to correspondingly reduce them in order to minimise its use (which is the aim of the recommendations discussed in the next chapter).

It may be useful here to consider Simon’s (1957) two faces of decision making; the first emanates from a value orientated foundation and the second a factual one. The value based face of power does not necessarily refer to individual values but may also relate to establishment level or even socially accepted community or common sense values; a good
example of the latter two relate to specific conceptualisations of older people. The factual face of power is more related to constraints, generally emanating from wider pressures relating to budgets or what is realistically achievable. The former may differ from the goals of the organisation, whereas the latter does not. This aptly describes the pull that appeared to be felt by decision makers, whereby a number of factors could potentially affect the outcome. Yet in the case of LAHOSs the balance tended to be tipped toward the factual reality that the organisation could only conceivably assist the few. Conceptualising decision making as double edged in this way can assist in understanding why views may differ to such a wide degree between public sector workers.

The ‘Street Level Professional’
Chapter Two reported scholars who had attempted to reconceptualise the SLB to account for findings which indicated that the needs of the organisation (bureaucracy) may at times be secondary to that of the service user or community. In many respects these renewed conceptualisations are reminiscent of Lipsky’s (1980) vision as to how SLB’s may be tempered through adopting a more tailored, local outlook, though he remained pessimistic as to the likelihood of this ever becoming a reality (this is considered further below). Lipsky (1980, pp190-191) further acknowledged that frontline workers were not merely ‘bureaucrats’. For instance he alluded to actions at times which would be better described as ‘street level professionals’, albeit with a propensity to view this as an ideal type scenario rather than reflecting the reality of policy delivery (Lipsky 1980). The ‘street level professional’ refers to an officer’s ambition to be more open and responsive, with the ability to provide provision to meet client need. This is in contrast to what can realistically be delivered in an environment where restraints, rationing and control become the necessary norm. In fact this is where the ‘dilemma’ in public service provision can be found, in the inherent contradiction between the stated aims of the role (the professional), and the actual reality (the SLB) (Lipsky 1980). It was suggested that the only way statutory services could improve was to allow the professional to flourish in a supportive environment, which was assessed as unlikely due to the perennial problems that plague public service delivery (Lipsky 2010).

With regard to the LAHOS environment, while some interviewees stated they had benign inclinations when they commenced the role, it was found that implementation, in line with Lipsky’s assertion, was generally (though not always) geared towards organisational level
concerns, which in turn was directed by political priorities. Examples of positive discrimination were few and far between and focused on specific types of individual rather than the community of homelessness applicants as a whole. It is therefore concluded that terms such as ‘civic entrepreneur’ (Durose 2009) or ‘citizen agent’ (Maynard-Moody and Musheno 2000), did not reflect the role of frontline LAHOS officers. Rather, the nature of policy dissemination tended to emulate those found in social service departments (Evans 2010; Sullivan 2009; Ellis 2007). This is likely to be a consequence of unique research contexts, reflecting the diversity between street level bureaucracies and the SLB’s employed within them. For example unlike the LAHOS interviewees, who tended to depict a relatively isolated and marginalised position, the frontline departments who participated in Durose’s (2011, 2009) study had a more community orientated focus. Although the adoption of closer local partnerships and networks was encouraged during the time of the homeless prevention agenda over a decade ago (DCLG 2006), most interviewees reported that joined up working had remained an unrecognised ambition.

This is a further example of how expressed policy intentions may not play out in reality, particularly if local organisations are left to implement specific initiatives without a stronger central directive. This is not to say that community orientated or altruistic intentions do not exist in LAHOSs, but rather, that for the most part this appeared secondary to centralised objectives. A further point is that homelessness provision, as discussed in chapter Three, can be viewed as a peripheral service, which community wide initiatives may bypass (St Mungos 2011). Although Durose (2011) recognised that bureaucratic pressure and influences intersperse with neighbourhood level matters, it is argued that a more integrated perspective such as this may underplay the overarching influence that higher level pressures may exert. This is particularly so for public sector organisations which are crisis led, or experiencing severe resource shortages.

_The frontline worker as political actor_

Lipsky (1980) described the role of frontline workers as politicised and additionally, that the wide discretion afforded to them contributed toward the creation of policy. He later suggested that scholars had overemphasised the significance of this argument, stressing that viewing practitioners as policy actors must be understood within the context of the wider political process; however, he nevertheless maintained his earlier position (Lipsky 2010). Although, as stated above, discretion permeated most LAHOS decisions, the actions were not linked to
political behaviour. It was further found that while practitioners undoubtedly influenced policy at the delivery level, they had little overall input into the reform of those said policies, which followed previous findings (McNeil 2009, p9). In respect of executing the Housing Act LAHOSs as an organisation technically had the freedom to interpret legislation as they saw fit, but a significant caveat was the requirement to meet conditions, locally and centrally set, to reduce statutory homelessness and use of emergency accommodation. These findings supported the main scholarly arguments around the nature of power reviewed in Chapter Three, but are contrary to those of Andrews et al (2012) and Crotty-Nicholson and Miller (2011), who argued that policy makers depended on the expertise of bureaucrats to inform policy development. It also contrasted to Evans’ (2010) findings that supervisors viewed themselves as having the ability to feed upwards and shape political developments (see below).

Two worlds could be identified, one in which LAHOSs actually operated and the other, a political hierarchy which underpinned the backdrop of that role. In many cases interviewees occupied a contradictory space, one in which they held some (albeit limited) power over service users, yet were relatively powerless at higher levels. Most interviewees did not view the role they undertook in a political light, locating themselves within their own organisation and the service users whom they dealt with on a day to day basis. When asked in what ways they influenced policy, practitioners would often refer to localised procedures, rather than focus on the bigger picture. However, the perceived lack of ability to change existing parameters was not necessarily perceived in a negative light, as many interviewees did not identify with their role as one that should contribute toward political behaviour. For instance one manager stated that it was not her job to be a politician, that each employee, from the upper to lower echelons, had their own role to play; and hers focused on the micro, service level, not the macro task of making policy.

This thesis thus supports the findings of Maynard-Moody and Musheno (2003) that practitioners, far from viewing themselves as political agents, perceived their job as advocating (though the researcher would question the emphasis on ‘advocating’ in the LAHOS context) on behalf of service users, albeit in an environment where most could not be helped. This is not to say that interviewees did not hold strong opinions with regard to the direction Governments took, but more that there was an implicit understanding that their role was not policy orientated, but rather, to get on with the job at hand. In respect of
politicisation, it is argued that frontline practitioners, at least in SLB’s, identified more with the bureaucratic principle of detachment in delivery (as considered in Chapter Two).

In summary LAHOS practitioners have the potential to ‘shape’ but not ‘create’ policy (Maynard-Moody and Musheno 2000, p341); even then, the shaping is moulded into organisational, and by extension centrally political, aims. However, the main criticism in terms of Lipsky’s identification of SLB’s as policy makers may be one of conceptualisation. That is, this terminology tends to evoke a powerful image of a frontline worker forming an essential cog of policy formulation, yet the constraints which underpinned these actions formed a chief focus of Lipsky’s framework. So therefore it is Lipsky’s particular interpretation of what constitutes a ‘policy maker’ that is disputed, rather than his actual description of the implementation process itself. However, as pointed out in Chapter Two, service users may nevertheless view LAHOSs as political agents as they tend to regard local public services as being tantamount to the Government.

_The supervisor as Street Level Bureaucrat_

Lipsky (1980) suggested that line managers had a role to play in respect of containing the use of negative discretion by frontline officers. This view remained evident in his updated work where he considered the strategies supervisory staff might attempt in order to limit SLB type behaviours (Lipsky 2010). As discussed in Chapter Two Evans (2011) criticised Lipsky for homogenising the role of managers and subsuming them within the bureaucracy. Correspondingly he argued that Lipsky had failed to acknowledge that supervisory staff could also be defined as SLB’s and further, that he had overestimated their desire to monitor the work of frontline officers (Evans, 2011, 2010). The researcher would additionally add that Lipsky’s account of the relationship between supervisor and officer was not always consistent, whereby on the one hand he stressed their desire to prevent SLB practices, yet at other junctures indicated that they sometimes accepted the need for its application so objectives could be met (this is examined below).

The interviews supported Evans’ main critique that departmental managers should not be viewed as homogenous. It further corroborated the contention that supervisors may tacitly or actively endorse specific SLB type behaviours. This was due to the fact that they were subject to central pressures relating to lean budgets and targets to an even greater extent than staff members in most cases. Although local accommodation resources were important it is
maintained, following Rashleigh (2005), that central political priorities were the main causation of gatekeeping behaviours, as even when senior officers encouraged this practice, it was reported to be in response to higher level directives. Moreover, the interview findings in respect of a specific authority showed that where a line manager had consciously attempted to increase statutory homeless applications, central objectives appeared to take precedence as frontline officers paid limited heed to the instructions.

One area where Evans’ (2010) research supported that of Lipsky (1980) was in the finding that supervisory staff viewed that they could affect higher level policy behaviour. But this contrasted to LAHOS line managers who assessed their role as having a very limited ability to impact on political actions (covered below). This serves to highlight, as with the above discussion relating to the conceptualisation of frontline workers offered by Durose (2011), that micro level dynamics essentially differ at the departmental level. Yet it has always been maintained, as covered in earlier chapters, that the SLB should not be viewed as a ‘one size fits all’ model of public sector service delivery, and is more suitably viewed as a guiding principle.

Finally, this thesis supports the argument (outlined in Chapter Two) that the influence of SLBs did not wane due to the managerialist element of NPM reforms. In fact, far from an increase in managerial influence curbing SLB behaviours in LAHOSs, it may encourage it and due to higher level concerns, allow it to thrive. The role of supervisors in LAHOS departments in considered further below.

**The Street Level Bureaucrat in statutory housing option services**

The following sections situate Lipsky’s framework within LAHOS delivery and links in with all the research questions. The concepts of discretion, specialisation, scrutiny, differentiation and rationing behaviours are positioned within the main LAHOS role, and are considered alongside the enduring prevention agenda and more recent coalition developments. The final section revisits some of the issues touched upon in Chapter Two regarding power relations within LAHOSs, specifically with regard to the position of service users.
Illegitimate use of discretion

In light of research findings discussed in Chapter Three linking inadequate resources to unlawful policy implementation, the challenging environment conveyed by the LAHOS survey respondents was a concern. To re-cap, it was found that over four fifths reported accommodation shortages and the same number that welfare reform was adversely affecting service delivery (this rose to 90% when recent amendments to LHA was isolated). Further, over two fifths felt that the heavier workload gained as a result of recent changes had hindered their ability to undertake the role effectively, or ensure all those who required assistance could receive it. Placed in the context of earlier research findings these results were viewed as indicative of an environment where unlawful gatekeeping could potentially flourish.

These observations were supported by the qualitative interviews where factors unrelated to application of housing policy unduly impinged on the process. Many interviewees felt that divergent individual level interpretations of the Housing Act formed an inevitable element of the frontline LAHOS role. It was not necessarily viewed as perfect, but more as the best that could be hoped for due to the inherent nature of a policy that deals with people. Yet the lack of internal consistency was assessed as a problem in respect of incidences where divergences occurred due to factors outside of a legitimate reading of the law. More specifically, alongside differing interpretations assessment of vulnerability was effected by incomprehension of relevant legislation, organisational led targets, limited prevention scheme funds and workload concerns. It is maintained that whilst the first reason may be acceptable, the others introduce financial constraints or external pressures into decisions which should be guided by related policy, guidance and caselaw.

There is further a concern that policy problems are more likely to be overlooked if hidden from the central gaze, as iterated in the previous chapter when it was considered how homelessness figures can be minimalized by the use of gatekeeping or prevention (lawful or otherwise) measures. The ability to achieve outcomes will additionally be related to the congruity between central and local goals. For instance in respect of LAHOSs it was found that provision which achieved the best outcomes for service users normally proved contrary to political objectives. That is, it would usually involve an increase in statutory homelessness acceptances and subsequent increase in use of emergency and/or social accommodation.
Addressing negative discretion

Frontline practitioners and line managers (as highlighted above) were both found to contribute toward gatekeeping and though the latter were at times accused of exacerbating it, the findings in respect of one LAHOS indicated that they may be less successful at dissolving it. For example Chapter Seven described a manager who had, at the time of interview, failed in an attempt to ensure officers more readily completed homeless applications. This suggests that merely instructing an officer to undertake the role in a particular way may be insufficient to promote active change if the behaviour has become a natural part of service provision. The fieldwork and literature indicates that the prevention agenda is viewed as almost synonymous with the LAHOS role and moreover, this ethos has existed for over a decade. Therefore, change may require more than a verbal directive, particularly if there is no identifiable incentive to do so. In fact, increasing statutory homeless presentations would run counter to the main principles of the Gold Standard Scheme currently being operated by central Government, and the manager in question anticipated a negative political reaction if (or when) acceptances in her authority began to increase.

Lipsky (1980, p159) argued that preventing discretionary practices that may lead to misappropriation of the law was unachievable in street level bureaucracies, but suggested it could be potentially reduced by routinising the role where practicable. He further explored ways in which greater accountability could be ensured, but argued that a complete overhaul of the current system, relating to social and economic justice, alongside the way in which statutory organisations operated, would be required to make this realistic (Lipsky 1980, p210). Lipsky’s (1980, pp208-211) suggestions for reducing the negative aspects of bureaucratic delivery in many ways resembled a perhaps more utopian version (which Lipsky himself acknowledged) of how localism could work in practice, envisioning a setting where individual practitioners, peers, and service users work in harmony, with emphasis placed on a greater level of role professionalisation alongside substantive training and development. Furthermore, decisions would be made on a team basis, whereby individual officers would no longer work in isolation or make assessments independently. It was suggested that removing individual responsibility in this way could work toward lessening pressures around accountability.

Yet as discussed in Chapter Two, localist agendas may merely tip the balance of power into the hands of others, whereas marginalised groups such as the homeless still lose out due to its
unpopularity as an issue. Moreover, though the current Government has removed more direct forms of scrutiny, indirect types remain and where performance measures are in place, they have been found to essentially encourage SLB type behaviours. Additionally, the interview findings showed that decentralisation initiatives such as the Localism Act would in some cases be utilised to gatekeep and protect resources, rather than contributing toward more effective targeting where needed (see below). Finally, and as will be considered later, there appears to be no political desire to lessen the pressure of practitioners to meet the aforementioned objectives; in fact, the rise in homelessness acceptances in recent years mean these may be felt to an even greater extent.

In respect of routinising elements of the role, one way to do this may be to remove the ability of LAHOS practitioners to make statutory homelessness decisions. The survey findings showed that around two fifths of practitioners made independent assessments of homelessness; when routine or non contentious decisions are added the number was closer to two thirds. This was not reflected in the interview sample, whereby over three quarters reported that practitioners made their own decisions. It was further found that only one of the LAHOSs interviewed planned to remove decision making responsibilities from frontline officers in the future, with the authority who aimed to do so stating that at present it was unfeasible due to low resources. In any case, a number of problems are foreseen if decision making responsibility is passed to senior staff.

The first is that homelessness assessments are time consuming and complex and it is unrealistic to expect a manager to take on these extra responsibilities alongside their current role. To make this option realistic and ensure decision making is thorough, more supervisory staff would need to be employed. It is argued that the extra costs this would incur makes it unviable, and that LAHOS practitioners are better placed on the frontline to make these decisions in any case, provided adequate training and time resources are at their disposal. Secondly, one of the most significant examples of negative discretion was the exercise of gatekeeping, which does not require a decision in the first place. To limit gatekeeping practices, even if managers are sufficiently motivated to do so (see below), would involve checking every service user who approached, which as highlighted in Chapter Two and supported by the fieldwork findings, is clearly unworkable.
The third issue relates to Lipsky’s (1980) assumption that the main aims of senior staff are at odds with the SLB and correspondingly, closer involvement of the latter would equate to the quelling of its employment. Yet this was not found to be the case, as implicit approval and even encouragement of unlawful behaviour was in evidence. This use of illegitimate discretion as a way of achieving policy objectives, despite being contrary to the ‘official’ rules set out, was in fact recognised by Lipsky (1980, p19) and referred to as a ‘neat paradox’. As stressed above, this is an area where Lipsky’s theory of staff/supervisor relations becomes somewhat dislocated, as on the one hand he stresses the desire of managerial staff to suppress SLB’s, yet on the other acknowledged that in particular circumstances its operation is recognised as essential for the continued operation of statutory services. This brings us to the fourth point, that giving decision making powers to senior staff will result in a more streamlined approach (though, as seen in respect of one authority interviewed where managers made the final decision, the same disparities existed). In light of interviewees who accused supervisory staff of misappropriating the law to a greater extent than frontline officers, it is suggested that shifting the emphasis toward senior staff may make little difference; if anything, it could increase incidences of gatekeeping.

Ultimately, a significant financial injection and change of central role focus would be required if the routinisation of LAHOSs became a political goal (this is considered further in the next chapter). Yet attempts to reduce frontline discretion would arguably be swimming against the current political tide in any case due to the Coalition Government’s stated desire to enhance it (DoH 2010). In summary it is contended that as professionals, LAHOS practitioners are best placed to make legal homelessness assessments, but an important caveat is that they are furnished with the appropriate tools to do so.

Specialisation of function
Lipsky (1980) believed that the ambiguity and complexity of policy directives was one of the chief reasons SLB’s were able to manipulate how they applied it. Although this may be a deliberate tactic, in respect of LAHOSs it was also found that insufficient understanding of housing legislation was potentially an impediment to effective service provision. For instance, the survey findings showed that three quarters of respondents felt that at least one area of the Housing Act required greater clarification. In a similar vein to Niner’s (1989, p22) earlier finding, the interviews found that practitioners generally relied upon other methods of accessing information, such as informal knowledge transfer. However, this leads to questions
around whether workers learn bad habits or use outdated, or even incorrect information. The interviews uncovered that a few practitioners confused tests around priority, homelessness and eligibility, with one even stating that he did not use the Housing Act when making decisions, instead basing judgements on ‘in house’ experience. One manager suggested that staff could look on Google as an alternative; a few others advised that legal updates were emailed to staff, or were freely available online. But it was found that only a minority of officers kept up to date with caselaw, with reasons often being linked to workload pressures. In any case it is arguably not reasonable to expect practitioners to keep track of more complex legal updates without some specific guidance. Caselaw changes frequently, and more importantly, can shed light on more nebulous parts of the Housing Act. Another important discovery is that lack of training may mean that nationally run schemes, with apparently uniform and concrete directives, may not be delivered consistently; this was found in the survey in respect of the national Mortgage Rescue Scheme. A further cause for concern was an example provided by one practitioner that her authority had been given the choice of losing a member of staff, or foregoing training for the next few years, which the analyst would argue is removing the basic toolkit required to undertake the role.

It was found, as outlined in Chapter Six, that a few authorities were working toward an ‘enhanced housing options service’, whose intention was to incorporate more holistic advice into LAHOSs, generally relating to employment, education and training. Yet it is argued that if practitioners do not receive satisfactory training to ensure they undertake the current role effectively, how will they be able to take on other areas of responsibility, particularly that of a specialist nature? Many of the LAHOSs interviewed had an appreciation of the link between homelessness and a wide spectrum of related issues, as covered in Chapter Six, but although general advice may be given in these areas, it tended to be essentially a sign posting role that practitioner’s realistically adopted. On a related point, a few interviewees advised that multi agency working was imperative to ensure that service users could be helped in a more holistic sense. Yet many reported a poor working relationship with some organisations, with one suggesting that they tended to be isolated from other services.

**Scrutiny**

Due to the reported prevalence of gatekeeping practices (discussed below) it is maintained that TSO’s or equivalent legal advice organisations play an important role in assisting households who wish to challenge the advice or service provided by LAHOSs. As shown in
Chapter Seven some interviewees felt that this type of external scrutiny kept them on their toes, making them more mindful of reaching negative decisions or impeding homeless applications. Further, where information was available in the LAHOSs interviewed it was found that nearly half of all negative decisions disputed by TSO’s were subsequently overturned. Moreover, where gatekeeping practices had taken place, TSO representatives were able to ensure LAHOSs undertook their lawful duties. Additionally, the LAHOSs who reported fewer challenges appeared to be linked to availability of TSO’s in their respective areas.

As argued in previous chapters, service users will not generally possess detailed knowledge of housing policy (Reeve and Batty 2011), or have access to the mechanisms at play within statutory housing services (Lidstone 1994), and the third sector professionals interviewed iterated that representation for vulnerable groups was vital. Yet as cuts to LSC and general charitable funding continues its downward spiral, legal help is less likely to be freely available. Furthermore, evidence suggested that even where legal aid was theoretically available, funding was insufficient to ensure it was accessible to all who required it, or at the very least the service user would need to approach areas outside of where they lived.

*Client differentiation and resource scarcity*

It was found that insufficient resources inevitably led to choices around where funds should be channelled, which in many cases meant households assessed as not vulnerable were offered limited options. For example, in respect of the survey and interviews it was found that a minority provided both rent in advance and a bond to applicants with no identified vulnerability and thus this option was available to less than a fifth of this group. Added to this around a quarter of respondents did not offer rent in advance in any case; when reasons were given for this, it was attributed to a lack of affordability. Based on the survey findings large, urban authorities generally applied stricter criteria in terms of assessment of priority need for prevention schemes, which may have been connected to the higher reported level of challenges.

A further issue was that in the few LAHOSs interviewed who offered private rented schemes to non vulnerable households, in some cases this was discretionary and described as being dependent on individual circumstances. Interviewees struggled to provide definitive examples of when positive discretion was used for non priority households, though one suggested they would
look more favourably upon ‘genuine’ cases. This returns to Maynard-Moody and Musheno’s (2003) finding that a mixture of personal attributes, lifestyle and the likability of the service user, amongst other considerations, would impact upon the probability of receiving preferential treatment. The interviews supported this, ascertaining that likeability, believability and perceived similarity between service user and decision maker could all impact upon the assessment process. These findings inevitably lead to questions around the corresponding outcome for service users who are unlikeable, perceived as untrustworthy, or perhaps do not share the values or characteristics of officers. These questions are particularly pertinent in respect of those who may present with multiple problems which are less likely to fit into the worldview of a practitioner. It seems plausible that service users viewed as ‘undeserving’ or untruthful are less likely to be offered a discretionary service, placing them at a distinct disadvantage. Additionally, the interviews indicated, in line with earlier scholarly evidence, that events such as leaving the family home (Rashleigh 2005), fleeing domestic violence (Quilgars and Pleace 2010) or presenting with particular health conditions (Bretherton et al 2013) may increase the likelihood of service users experiencing an inadequate service. Similarly, and as cited by examples in Chapter Seven, service users described as substance abusers, prison leavers or as having ‘never worked’, were also generally perceived in a negative light.

The picture which emerged was of a disparity between the (albeit few) LAHOSs who could afford a generous and diverse range of prevention options and those who could not. A shortage of these schemes further presented a situation in some LAHOSs where vulnerable groups may be offered a range of options in the private and social housing sector that were out of reach for their non vulnerable counterparts. It is argued that many non priority households could effectively be hidden from the public gaze as a result of having no legal right to housing, as they are absent from official statistics. Further, in the current milieu there is little a service user can do to tip the balance in their favour if they do not satisfy specific criteria, save for being viewed as ‘worthy’ of favourable treatment. Even in cases where households satisfy the stringent homelessness tests, they may still be at the receiving end of a poor service, which is why legal advocacy from external organisations is so imperative (see below).

*Gatekeeping and the prevention agenda*

As iterated in Chapter Three and supported by interview findings, the use of gatekeeping appears to have worsened since the turn of the century due to the ascension of the prevention
Correspondingly, preventing homelessness was viewed by many interviewees as the gold standard, with a few managers expressing the view that statutory applications must be treated as an absolute last resort. Furthermore, in line with the literature, the survey and interviews found that service users were generally steered away from statutory homelessness applications and moved toward advice or prevention services. For instance, the survey found that nearly four fifths of literally homeless households viewed as priority need were initially offered advice as opposed to a homeless application, the numbers were even higher for non-vulnerable households, or those homeless within 28 days. It was further established that large, urban authority types were more likely to adopt front desk or initial screening than rural ones, perhaps due to their size and thus having the resources to finance extra layers of provision. Although the survey findings cannot be treated as evidence of gatekeeping, the fact that very few households were offered a homeless application when they first approached services is a cause for concern; furthermore, the interviews, for the most part, supported the survey data. For example, interviewees recounted that issues such as local connection, perceived believability of reason for homelessness or requirement of emergency accommodation may all result in the use of gatekeeping to dissuade service users from making a statutory application.

As highlighted in Chapter Three, it is unlawful to offer prevention services in place of a statutory application. That said, it is arguably understandable that a LAHOS will attempt to focus on prevention options at an initial stage, particularly if a household is only ‘threatened’ with homelessness and in light of the aforementioned pressures to keep statutory homelessness low. But in cases where households have nowhere to stay that night clearly more urgent intervention is required. Moreover, in legal terms, a non-priority household has the right to make a statutory application, so therefore this option should be offered. Yet although Chapter Six referred to an anecdotal account of an officer who had boasted about her record of taking no homeless applications in several months, it was clear that many interviewees felt aggrieved at being placed in what they viewed as a difficult situation.

A principal barrier to change, as discussed above and referred to below when power in LAHOS delivery is explored, is the argument that the Government are not sufficiently motivated to lessen gatekeeping. That is, tacit approval is given as long as the official aims of reducing homelessness are achieved. This latter charge is made in light of the fact that gatekeeping has been well publicised in the past, but as far as the author is aware, no actual
action, save for vague verbal warnings, have been taken to stem it. Could it be argued, following Foster (1983) that in certain circumstances policy makers may intentionally fail to legislate in respect of rationing behaviours which result in policy contravention, in an attempt to hide the extent of what is ultimately an unpopular political problem? This lends support to the claims discussed in Chapter Three that the primary aim of the prevention agenda was based less on altruistic principles related to helping those who were homeless and more on politically motivated goals intended to reduce ‘damaging’ statistics (Lund 2011, p169). This would further help explain why prevention initiatives tend to focus on groups classed as being in priority need for assistance (Jones and Pleace 2010; Pawson et al 2007), as many households who become homeless but fail to meet the main statutory tests do not contribute toward DCLG quarterly statistics.

A fundamental concern regarding the practice of gatekeeping is that it may ultimately hide the true prevalence of homelessness risk factors, which will in turn impact upon the level of resources assessed as necessary to tackle it. For example an interviewee employed for a LAHOS who classed themselves as more ‘generous’ complained that their willingness to take homeless applications placed them in a detrimental light in political terms, particularly in comparison to colleagues who were perceived as impeding applications where possible. In other words the LAHOSs willingness to take statutory homeless applications, when looked at purely from a quantitative angle, gave the appearance of a larger homeless problem than authorities who were stricter, thus making them appear unfavourable. As touched upon above, another manager felt that her authority had manipulated homelessness figures for too long, artificially representing it as being no problem due to the very low number of statutory applications taken in recent years. These provide an example of how hidden types of homelessness in particular can be effectively concealed from official statistics and highlights that the way in which it is recorded can potentially determine its perception. Dependent on the focus of the authority we may develop very different insights into the extent to which there is a homelessness problem in a particular area, which will likely be formed on the basis of how it is recorded, rather than the actual reality. Nevertheless, the attitude that impeding statutory applications was damaging due to the misleading picture it created was rare. Although, as highlighted above, interviewees for the most part did take issue with applying negative discretion.
Therefore, though official figures show that statutory homelessness and rough sleeping have increased in recent years, there is a concern that its full extent remains unseen. It is argued that instances of people losing their home in some cases are effectively hidden behind prevention outcomes, or worse still, do not show up at all due to being assessed as ineligible for assistance. It is argued that if the number of households losing their home is shrouded in these ways, this may arguably give politicians less reason to address this important issue. These findings lend weight to Lipsky’s (1980) suggestion that if the use of performance measures were lessened, this would likely ease SLB type behaviours.

The Coalition Government’s response to frontline homelessness delivery
In respect of new Coalition measures, adoption of the Localism Act was still a work in progress during fieldwork, but it was found that contrary to the findings of Inside Housing (2013) highlighted in Chapter Two, intention appeared to be more linked to housing resources than the political leaning of a given authority. For example authorities with scarcer accommodation options were more likely to express an intention to utilise new powers to discharge duty into private rented properties. The findings highlighted that a postcode lottery may come into operation, whereby households who become homeless in areas with more plentiful accommodation or less availability of private rented options, would achieve more favourable outcomes than those who resided in LAHOSs where implementation was less feasible.

It is questionable whether it is reasonable that homelessness outcomes can vary so dramatically as a direct result of where a given household’s local connection happens to be. Of perhaps greater concern was the suggestion that execution of this part of the Act, even if viewed as unworkable due to shortages of private rented accommodation, may potentially be treated as a weapon that could be brandished to discourage households from presenting as homeless. It is thus believed that the option to weaken tenure security for accepted homeless applicants could be adopted as an additional gatekeeping mechanism in at least some authorities. In respect of the Big Society agenda, there was no consensus as to what it meant for LAHOSs, but in the sense that most interviewees linked it to austerity measures its presence was felt. On the other hand the few who attributed the Big Society to community linkages had little to say with regard to any measurable impact on service users. In summary
it was found that the efficacy of the Big Society as a discursive entity was far greater than any physical or ‘real’ ability to effect change.

As highlighted in Chapters One and Two, the current Government have followed the path of its predecessor by prioritising prevention and limiting statutory homelessness acceptances (DCLG 2012b). It is acknowledged that a focus on prevention can ensure practitioners adopt a more holistic approach, as it looks at ways to avert homelessness which perhaps did not exist before the turn of this century. Yet for the most part the concomitant pressure to keep statutory homelessness acceptances low appeared to be a chief element of the prevalence of gatekeeping. This pressure is evident in cases where Central Government have urged frontline officers to make greater use of preventative measures to counteract the recent rise in homelessness acceptances (Parliament 2012). This further picks up on a theme which epitomises central political responses to the ‘homelessness problem’. It appears to deflect responsibility for rising levels of homelessness from the centre and places it upon the individual actions of local authorities. Effectively, homelessness becomes less of a structural concern driven by macro policy and re-emerges as a more localised, micro level matter. That is, when the Government suggest that frontline services must work harder to prevent rising statutory homelessness, it places the blame outside of central hands and fails to tackle the resource issues which are at the heart of said increases.

It is argued that if homelessness continues to be viewed as a decentralised concern, fundamental policy change becomes less likely. This effectively builds upon earlier arguments that decentralisation relating to ideals such as the Big Society or legislative measures such as the Localism Act are insufficient to deal with a problem that requires coherent, sustained and large scale attention. In other words, to ensure that all types of homelessness are reduced (not just visual or statutory) requires a drive from the centre and cannot rely upon individual authorities. This is not to say that LAHOSs are not up to the task, but rather, political pressures, resource shortages and divergent operating systems mean it is not possible for them to provide an effective service for all whom require it. The survey findings showed that the majority of practitioners were dealing with mounting workloads and prevention initiatives were subject to tight eligibility due to inadequate resources. It is therefore argued that even if practitioners double efforts on prevention work (which in a climate of budgetary cuts seems unlikely) it will remain ineffective without a corresponding increase in the availability of suitable and affordable accommodation, or at the very least an
injection of funding so all households at threat of homelessness, and not just the vulnerable, are assisted.

**The exercise of power in frontline implementation**

This section returns to the debate touched upon above and covered in some detail in Chapter Two around the nature of power held by frontline practitioners. The usual reasons provided by interviewees for re-shaping policy directives suggested they held limited ‘real’ power, as actions tended to be embroiled in organisational directives. Following on from this the research findings supported the claim that gatekeeping in LAHOSs was not an exercise of power on the part of a given employee, but rather a reaction to higher level priorities that rendered them relatively powerless to influence the process, which is reminiscent of earlier arguments (Rashleigh 2005; Loveland 1991). A further consideration is Heywood et al’s (2002) assessed link between manipulation of policy directives to fear over job security, whereby officers may feel pressured to ensure figures look right so they do not lose their employment (job insecurity was reported by over a quarter of survey respondents). Overall the findings principally followed Hill (2009, p9) who argued that many frontline professionals could exert power over service users, but not over the overriding purposes of the role. This in turn is consistent with Lipsky’s (1980) portrayal of the nature of power in SLB’s, although his notion that practitioners make policy appears, on the surface, to contradict this (as discussed above).

**The position of service users**

Despite acknowledging that the public, at least in a collective sense, could exert pressure on statutory organisations in specific circumstances, Lipsky (1980) maintained, as highlighted in Chapter Two, that service users were in an even weaker position than officers, often undergoing a social construction in which they became dehumanised, subject to the rules of the organisational game. While positive discretion may have been exercised in respect of a few LAHOS users, for the most part, due to overriding shortages, there seemed to be an implicit understanding that many would not receive an adequate outcome. Lipsky (1980) suggested that one way of making service users more aware of relevant frontline processes would be to provide them with greater autonomy in terms of how they access the public sector. It was viewed that if service users had a greater comprehension of how a given organisation operated it would hold decision makers more accountable for their actions.
Furthermore, Chapter Three pointed to findings which showed that service users were less likely to be turned away from LAHOSs if they had an understanding of their legal rights (Reeves et al 2011).

Chapter Three focused on initiatives which were shaped around empowering service users, such as mystery shopping (Cheeseman 2011) and action research (Help the Aged 1999), looking at potential ways to enhance their ability to influence the process. Cheeseman (2011) further believed that the political steering toward localism may assist in empowering the individual as service user, yet due to the reasons highlighted above, this is questioned. It is moreover felt that Lipsky’s suggestion that service users should become more involved in statutory processes does not transfer well to LAHOSs. This is because housing problems may occur without warning and/or the assistance subsequently required may be on a short term, or one time only basis. Finally, households who require help may not have peers who can relate to the experience, which as discussed in Chapter Two, can place them in an isolated situation. It is nevertheless argued that steps should be taken to increase service user involvement and this is considered in the next chapter when policy recommendations are made.

The Street Level Bureaucrat and older service users
The final three sections discuss findings in relation to older people affected by homelessness and deals chiefly with research question’s two through to six. Chapter One introduced the concept of active ageing and recommended that its (wider) principles, as adopted by scholars such as Walker (2002) and organisations such as the WHO, are acknowledged when developing policy and practice in respect of older people. However, a literature assessment revealed that English housing legislation had failed to capture this essence, either focusing on a pathological model of ageing for the oldest old or ignoring the impact ageing may contribute toward the experience of homelessness; these findings were echoed in the fieldwork (see below). As highlighted in Chapter Five the survey found that levels of provision for older service users was geographically uneven, differing dramatically within and between individual authorities. For example LAHOSs who applied a more generous assessment of vulnerability as a result of older age were additionally more likely to offer prevention or specialised services to this group. Yet the majority of LAHOSs reported very few services for older people and were less likely to consider age criteria per se to assess vulnerability. These low levels of provision were supported by the interview data, which also
depicted a complex and ambiguous environment whereby assessment of priority need and perceived service availability differed within as well as between LAHOSs.

Assessment of vulnerability

Chapter Three highlighted that LAHOSs are not required to confer automatic priority need on the basis of older age, but rather, take this factor into consideration. It was argued that information relating to how older age and vulnerability should be assessed was scant and fitted with Lipsky’s (1980) description of an ambiguous policy directive. Further, the interviews found that justification for specific patterns of decision making was not always consistent. For instance some interviewees held an assumption that larger authorities or those with scarcer accommodation resources would be more stringent in applying priority need due to their stronger legal representation or lower level of resources. Additionally, most practitioners did not indicate employment of the Pereira test, despite being legally required to do so. Moreover, a few interviewees stated that they did not factor age into the assessment process, despite its inclusion in the main Housing Act. These findings could be due to the fact that some officers were unsure of how to apply specific areas of policy.

For example the survey findings showed that over a quarter of all respondents believed assessment of vulnerability due to older age should be made more explicit, which rose to around a half in respect of responding officers who were responsible for decision making in this area. These results demonstrate that in some cases at least, decision makers are assessing vulnerability despite the fact they are not completely confident in how to interpret the applicable legislation. On a related point even if older people approach services with a specific issue, such as a health problem, interpretation may still remain a concern. For instance the survey found that around three quarters of respondents felt the Housing Act needed to be clearer about the assessment of vulnerability in at least one area, with nearly half referring to mental health. In light of the considerable impact that assessment of priority status can have on a household’s ability to secure suitable, long term housing, or in some cases, funding to access the private sector it is maintained that tackling disparity due to misapplication of relevant policy or caselaw should be a political (and organisational) priority.

The UK Coalition of Older Homelessness (2011) argued that priority need should be automatically conferred once a person turns 50, as premature ageing is an inevitable
consequence of rooflessness. This recommendation is not surprising in light of findings discussed in Chapter One that life expectancy for the street homeless is around 30 years less than for the general population (Thomas 2012; Kitchen and Welsh 1998). Although these figures do not tell us much about households who are at threat of homelessness, or living in unsuitable conditions, it should direct decision makers thinking when assessing priority need based on older age. This is because assessment of vulnerability must legally be applied as a hypothetical test to determine if a household would be at greater detriment if they were to subsequently become roofless, as per the aforementioned Pereira test. Yet despite scholarly arguments linking vulnerability to ageing the survey found that only one third of LAHOSs applied automatic priority on the basis of older age (this dropped to less than a quarter in respect of those under 70). This dramatically differed from earlier findings indicating that the majority of LAHOSs applied an automatic priority need criterion once a service user reached a particular age (discussed in Chapter Six).

The reason why proportionally fewer LAHOSs applied an automatic priority criteria can only be inferred, it further cannot be claimed with certainty that the samples in the aforementioned research are necessarily representative. However, as the relevant studies predated the prevention agenda, it does raise questions as to whether a tightening of statutory homelessness applications may have further impacted upon how broadly LAHOSs are willing to interpret vulnerability and a few interviewees believed it had become more stringent due to scarcity of resources (as touched upon in Chapter Six). However, others suggested it had occurred due to a reconceptualisation of the meaning of ‘old age’ within LAHOSs, which, if all other barriers are overcome, is acceptable.

In summary arguments around assessment of priority need due to older age are complex. Although it is accepted that any person who becomes street homeless is likely to suffer detrimental health, the research outlined in Chapters’ One and Three demonstrate that the older homeless population have differing risks and issues to that of their younger counterparts. Therefore policy formulation in this area requires a balance between grasping the inescapable physiological elements of ageing, whilst avoiding either its pathological treatment by focusing chiefly on frailty, or subsuming the needs of older people with that of their younger counterparts. This position is expanded in the next chapter when policy recommendations are discussed.
Housing options for older people

Initial impressions gained during the interviews suggested that older people enjoyed relatively favourable social housing options. Yet when the researcher delved deeper it was found that in most cases this referred to people over 60; even then, certain qualifying conditions, such as relating to specific physical health conditions, was still required. A further issue was that accommodation reserved for older people was often reported as being of questionable quality, warden assisted, sheltered or supported in some way. As highlighted in Chapter Three, the large majority of older people do not require specialist housing; so many options may be incompatible even to the needs of the oldest old. In respect of the ‘younger old’, settled housing options were in many cases equivalent to younger single people.

With regard to private rented accommodation people over 35 technically have an advantage over younger cohorts as LHA rates are paid at a higher (non shared room) rate. However, the overall decrease in total LHA levels meant that in most areas self contained private rented properties were unaffordable, with a few practitioners (discussed in Chapter Six) stating that older people could only realistically secure shared private options in any case due to the unreasonably high top up levels that would be required. In LAHOSs with scarcer housing resources this was a more significant issue, as it was reported that landlords could ‘cherry pick’ tenants. As identified in earlier chapters, older people who claim LHA may struggle to access private rented accommodation even if they can afford to pay due rent, as landlords have become more reluctant to let properties to those who claim welfare benefits.

Finally, and of particular interest to this thesis are the availability of emergency hostel options for older people who are homeless yet not assessed as meeting the priority need criteria. A significant gap was found in service provision related to emergency hostels designed with older people in mind. It was found that this type of housing was more geared toward families or younger people. In respect of the latter in particular interviewees were able to name specific projects aimed at the under 25s, but could think of none which concentrated exclusively on older groups. This finding was a cause for concern in light of the research discussed in Chapter Three that older people were sometimes intimidated by younger homeless groups, or were reluctant to use services in the first place due to a belief that they were for younger people.
Provision of services for older people

Inherent assumptions held by decision makers will undoubtedly impact upon the services designed with specific older people in mind and is thus an important consideration. When interviewees were asked to provide views as to why older people experienced housing difficulties, some responses mirrored those found in policy documents, depicting a frail person who required care or support. Yet others referred to older people affected by a relationship breakdown and a few acknowledged that this group may present with complex needs, such as substance misuse. However, none correlated it to causations which arguably had closer links to the economic crisis, such as losing accommodation due to affordability or unemployment. This is despite findings (outlined in Chapter Three) which showed that this group will likely suffer its impact to the same extent as younger cohorts.

In Chapter Three it was argued that viewing older people as a homogenous group for whom services can be designed to satisfy a ‘one size fits all’ principle was flawed (Age Reference Group on Equality and Human Rights 2005, p10). It then went on to illustrate research findings which supported the need for targeted advice and initiatives. Yet the survey found that less than a quarter of LAHOSs offered any specialised schemes for older people and even in those cases, only 14% viewed it as being adequate. Further, the paucity of provision in some LAHOSs was attributable to the view that it was not financially justified, or that older people’s needs could be subsumed within provision targeted at other groups (for example substance misusers, or those at risk of violence). For instance in an authority that was due to employ an older person’s accommodation adviser, the interviewee felt that the money would be better spent on generic private rented schemes.

It is not the intention here to accuse LAHOSs of wrongful thinking, as the fieldwork showed resources were tight and tailored services were understandably not high on the list of priorities. However, in recognition of research findings, as discussed above, the lack of provision for older people is a concern; moreover, if anything, current levels may worsen as budgets get tighter. An additional issue is that even where tailored services for older people were available, very few interviewees were aware of their existence; this is discussed further below and in the concluding chapter.
The third sector
Findings highlighted in Chapter Three showed that many older people became homeless in the first place as a result of poor advice or because help was refused when they asked for it, suggesting that ineffective early intervention could be a potential contributory factor in some cases. It was further identified that older people were more likely than other homeless groups to accept poor advice without questioning it (Pannell 2002; Help the Aged 1999; Parry and Means 1999, p19). Although the TSO practitioners interviewed did not refer to older people, they did express that if this type of organisation ceased to exist, many more households would likely receive limited help or experience unlawful gatekeeping. In light of these findings it is argued that TSO’s can potentially provide an invaluable support mechanism for older people.

Yet although it has been suggested that more TSO’s need to explicitly address the needs of homeless older people (Parry and Means 1999), it was found that where specialist TSO’s did operate, LAHOS interviewees may not be signposting service users to them due to a seeming lack of awareness. It is difficult to surmise whether this unfamiliarity was due to ineffective promotion by the TSO themselves or that information communicated to LAHOSs was missed as a result of other competing demands. Whatever the reason it is disappointing that in the few cases where TSO’s aimed at older people affected by homelessness did exist they remained an untapped resource in some cases. Moreover, it could place these initiatives in jeopardy as funding may be dependent on perceived level of demand.

Conclusion
This chapter has drawn together the literature and fieldwork findings to show the ways in which a SLB analysis can provide a useful framework to assess frontline LAHOSs. It considered this in respect of the current challenges to service delivery, causations of negative discretion and structural influences related to scrutiny, resources and role specialisation. The final section applied these arguments to older people affected by homelessness, arguing that service delivery and housing options were insufficient and that interpretation of vulnerability was tied, at times, to incomprehension of related policy, stringent targets and insufficient budget levels. Although this chapter touched upon ways in which services could be improved, the concluding chapter now considers these in greater detail.
CHAPTER NINE

Conclusion and Recommendations

Introduction

Overall it was found that incorporating elements of Lipsky’s SLB framework alongside a multi strategy research design proved an effective approach to answering the research questions set. This final chapter begins by returning to the main contributions this thesis has made to knowledge in the wider field before summarising how each research question was answered. This is followed by specific policy and practice recommendations based on the findings before finishing with a brief reflection around the research process itself, and suggestions for further investigation.

Main contributions

This thesis explored LAHOS delivery due to evidence which showed that misuse of intended policy directives could lead to preventable homelessness. It further concentrated on the experience of older LAHOS users due to the limited theoretical attention afforded to this group. It is also the first to apply Lipsky’s specific SLB implementation to older (or in fact any) user of English LAHOSs. It moreover provides an updated exploration of implementation in public sector homelessness services following the recent downturn and related political austerity agenda, as most studies in this area predate this. Alongside this the baseline survey which assessed the present challenges faced by LAHOSs has not been attempted elsewhere. The multi strategy design provided a unique insight into current challenges to service delivery on a wider scale, alongside how this was impacting on decisions made at an individual level. It was found that applying both quantitative and qualitative approaches with regard to the experience of older service users provided an extra depth to the analysis that either alone would have failed to satisfy. That is, the survey data highlighted divergent provision in a broad sense, but the interviews were able to uncover why definitions of vulnerability differed and provided insights into why specialised services were less numerous for older groups.
Summary of research findings

Whilst the previous chapter focused on the main findings in relation to the research questions in some detail, the aim of this section is to summarise the contribution made by each, which is further expanded upon when specific suggestions for reform are provided. Whilst the questions should be treated as interrelated, each is dealt with separately for ease of clarification.

1. Can Lipsky’s SLB conceptual framework offer an effective tool to help understand the exercise of discretion in LAHOSs, principally its negative employment?

Overall, Lipsky’s SLB framework provided a useful tool for exploring the delivery of statutory homelessness services. In support of the model it was found that functions relating to scrutiny, budgets and workload led to the rationing of services which at times resulted in misappropriation of the policies practitioners were charged to apply. However, it found no evidence that the discretion exercised by frontline workers constituted political behaviour. Additionally, whilst the focus on central tendencies was acknowledged by Lipsky, the SLB framework nevertheless arguably represents an overly homogenised workforce, whereby the interests of managers (of all levels) are assimilated, and viewed as a separate entity to the aims and values of frontline officers (who in turn tended to be presented as one unified substructure). Although the researcher acceded to this wider focus in the previous chapter, it is nevertheless believed that Lipsky’s narrow conceptualisation of supervisory staff in particular may underplay their role in the continued existence of street level bureaucracies.

In more general terms adopting an implementation focused lens allowed the researcher to consider the individual level elements which can impact upon service delivery, and how these might specifically affect the assistance that older people could expect to receive. More importantly, it linked particular outcomes to resource shortages or conceptualisations of the needs of an older person affected by homelessness. The recommendations provided below are borne out of the particular observations of this research and would unlikely have been uncovered without focusing on the role of frontline workers and their line managers.

2. Can the SLB framework assist in comprehending variation in service delivery, such as the allocation of resources, interpretation of legislation and service user differentiation, with a focus on older people affected by homelessness?
An implementation perspective in general and the SLB framework in particular assisted in comprehending the main factors which impacted upon decision making and service outcomes. This thesis supports the argument, outlined in previous chapters, that dissemination of policy directives can profoundly impact upon the quality of advice LAHOS users can expect to receive and further, that older people affected by homelessness may be provided with an ineffective service due to both unintentional and deliberate acts. But for the most part allocation was found to be more heavily rationed in areas where resources were lower, and legislation applied narrowly or at times deliberately unlawfully, in order to protect limited supplies. Alongside this it was found, albeit to a lesser extent, that individual or peer led values could contribute toward service outcomes. For instance older people threatened with homelessness were at times subjected to stereotypical assessments which connected their housing issue to frailty, or in some cases were not recognised as a unique group at all. These topics are considered further below when specific policy and practice recommendations are given with regard to each area assessed as requiring improvement. On a related point older people may also experience negative discretion due to factors which were found to affect all age groups, such as mental health issues or fleeing domestic violence, for example.

3. With particular reference to older people, in what ways may the current political context, principally relating to welfare reform and austerity measures, impact on LAHOS delivery? What has this meant for established role objectives, such as the requirement to limit statutory homelessness and temporary accommodation use?

This thesis has showed that assessing the impact of rationing practices in contemporary LAHOSs requires that it be situated within a broader, historical terrain. For example research carried out in the 1980s demonstrates that the requirement of LAHOSs to ration services is nothing new, due in the main to a longstanding funding shortfall combined with the fact that public sector housing has historically failed to meet demand (Murie 2012). Alongside this, scholars such as Lipsky (1971) and Parker (1975) were writing about the ubiquitous of rationing practices within public sector services back in the 1960s. However, this thesis supports later findings that the all-encompassing prevention agenda which arose in LAHOSs at the turn of the century exacerbated pressures already faced. Furthermore, the findings of this thesis indicate that LAHOSs are facing their most challenging period yet as a result of an even harsher spending agenda, coupled with the fact that households affected by
homelessness are continuing to climb. In light of research which has linked the likelihood of illegitimate discretion to resource problems; it is argued that practices such as gatekeeping will worsen as long as an austere policy framework remains in place.

4. How do LAHOSs perceive their role in delivering political objectives relating to homelessness? What internal or external constraints do they identify and in what ways can these be overcome or improved?

The current pressures faced by LAHOSs meant that SLB type behaviours were reported and although frontline officers could impact upon service outcomes, in line with Lipsky’s argument this was impeded by supervisory, organisational and central level concerns. Yet as highlighted in the previous chapter the current Minister responsible for homelessness has paid scant regard to resource pressures and instead has echoed his predecessors by identifying prevention work as key to stemming its flow (Gov.UK 2014). It is maintained that without giving due attention to how inadequate departmental budgets and lack of suitable housing underpins rising homelessness levels, politicians are only providing a partial picture. This is particularly so in light of findings that recent welfare retrenchment measures have further limited the availability of affordable, private rented accommodation. Moreover, as highlighted in Chapter Eight, it unreasonably places responsibility for a large scale structural problem at the local level.

The work of Lipsky and his proponents of the time, most notably Prottas presented the SLB as a problem, an epidemic within statutory organisations that needed to be contained. Fault was not placed at an individual level; rather, the blame was placed in the hands of those who create the ethos of a given organisation. That is, those who make the policies and procedures that SLB’s are required to follow. For example an inherent contradiction within LAHOS delivery was highlighted in the previous chapter; that is, by re-shaping policy directives, central political aims were satisfied, at least on the surface. This ultimately meant that frontline workers were required to contravene policy in order to satisfy policy goals. But as previously argued, policy makers may arguably be unwilling to alter the current state of affairs, as practices such as unlawful gatekeeping perversely assist in ensuring policy objectives are met. This inertia implies that the exercise of negative discretion will continue to go relatively unchallenged. As most interviewees reported incidences of gatekeeping, often
providing more than one example, it would suggest this behaviour is widespread and unlikely to be unique to the 12 authorities interviewed.

Before discussing the main policy and practice recommendations it is important to reiterate that Lipsky (2010) did not view SLB’s in a solely negative light, and acknowledged that some areas of the role could be fulfilling. For example it was recognised that pay and conditions had improved in some public sector professions in recent years. In this vein the aim of this thesis was not to paint a negative picture of LAHOS delivery, and there were a few examples where discretion was employed to positively aid particular service users. A handful of interviewees also referred to a sense of personal satisfaction gained from assisting people into suitable accommodation. Further, when interviewees were asked which areas of the role they enjoyed many valued the close contact with the public. But in the majority of cases it seemed that officers were unable to provide an ideal service to all who might require it, particularly in respect of service users with no priority need. Of most concern it was found that some practitioners were not furnished with the tools to make informed legal decisions, and moreover, that stereotypes and subjective judgements were employed to the detriment of the service user in some cases.

**Main policy and practice recommendations**
The following sections provide specific recommendations based on the main research findings. These suggestions are in part informed by Lipsky’s SLB perspective, which has guided the research from the outset. The first set of proposals deal with areas which impact upon all service users and the second addresses issues which chiefly concern older service users. It needs to be stressed that the proposals aim to be realistic and must be situated within an austere political reality. Following on from this point, even if a greater injection of resources is not forthcoming, focusing on more effective ways of channelling existing funds is important. Moreover, the proposals are relatively narrow in focus, concentrating on factors which have a direct impact on LAHOS provision. However, it is acknowledged that several recent policy decisions, particularly those relating to welfare benefit retrenchment, have had an adverse impact on service user levels (CIH et al, 2012; Fitzpatrick et al, 2012). Although reversing welfare cuts would undeniably go some way toward improving the outlook for households at threat of homelessness, the likelihood of this being acted upon, at least in the current administration, are small.
LAHOS policy implementation

Address training concerns

The fieldwork supported Lipsky’s (1980) assertion that attempts to diminish discretion are unrealistic. But although it is acknowledged that uniformity in service provision is not achievable or even desirable, it is argued that steps should be taken to supply a level of standardisation on at least some levels. Whilst provision of adequate training will not eradicate misappropriation of housing policy, as a wide array of factors were found to dictate decisions, it would at least ensure practitioners are better equipped to make informed assessments. It may further help ensure decisions are dictated more by legislative concerns, as it has been pointed out that if practitioners are unsure how to apply a role, subjective values are more likely to impinge on the decision making process (Keiser 2010, p249). Additionally, as highlighted in Chapter Three, commentators who undertook research into LAHOSs argued that a greater understanding of housing policy would improve the quality of advice and may reduce incidences of gatekeeping (Quilgars and Pleace 2010; BHUG 2009; Rashleigh 2005).

More specifically, training can assist in clarifying the broad and at times ambiguous goals inherent in the LAHOS role, which should go some way to ensuring consistency in service delivery (Chun and Rainey 2005). Additionally, ensuring that all practitioners are legally trained and well versed in the Housing Act is a necessary (though not sufficient) way to help ensure that decision making is fairer. Ultimately it is unjust that some practitioners may not receive adequate training due to resource shortages, workload, or for any other reason. One LAHOS in the study was forced to choose between foregoing training or losing a member of staff. While neither outcome was acceptable the authority plumped for the latter; this was understandable as it was unlikely that an under staffed service would have been able to invest much time to training in any case. Some LAHOSs provided in-house training, but this was patchy and appeared to centre on familiarising new staff members with the organisation itself. Where training around housing policy was provided it was reported as including basic areas of the Housing Act as opposed to more complex or up to date caselaw. Moreover, if there is no central guidance, it may be that localised inductions, due to their discretionary nature, will be more or less completed dependent on time and resources.
It is maintained that the officers themselves should not be held responsible for failing to keep up with legal developments, even in cases where the information is forwarded via email or equivalent. As repeated throughout this thesis, increasing demands on the service against an austere backdrop meant that many were struggling with increasingly unmanageable workloads. The interviews found that practitioners were enmeshed in daily struggles, and thus a strong central directive is required to ensure training is viewed as a vital component of the role, regardless of other resource problems. In summary the Government has a duty to ensure that LAHOSs, as a national organisation, are equipped to provide service users with high-quality advice. Ideally funding should be ring fenced to make sure this objective is met. One way to ensure basic legal training is undertaken is to produce a national standard that all new LAHOSs are required to follow. At present to enter a profession such as social work, for example, potential employees must attain specific qualifications; yet an equivalent benchmark is not expected of LAHOS officers. This is despite the fact that practitioners are required to interpret policy or caselaw which will significantly impact upon the lives of others on a daily basis. However, it must be stressed, as outlined above, that even if adequate training was put in place, this would only tackle part of the problem. For example the fieldwork findings supported those highlighted in Chapter Three (for example Bretherton et al 2013; Rashleigh 2005; Loveland 1991) which demonstrated that illegitimate discretion was more attributable to resource scarcity than ignorance of housing law.

**Improve role specific specialisation**

Despite the widespread reports of inadequate training, it was found that some LAHOSs aspired toward more holistic provision, generally referred to as an ‘enhanced housing options service’. This ambition is, at least in principle, laudable; but due to the reality that current service delivery is left wanting in many areas it is argued, theoretical. This is especially so in light of the recent increased pressures on services. It is suggested that LAHOSs should be encouraged to focus on developing existing provision before attempting to expand the role. Ultimately, to be in a position to provide quality, holistic advice on areas such as employment and education, a considerable injection of resources is required. This would be to ensure extensive training and adequate staffing levels to provide for the extra time required to assist each service user, particularly those with complex needs. Yet as highlighted above training was inadequate even to support specialist knowledge around homelessness itself, which must be a priority before training in other areas is provided.
In summary, without ensuring the correct infrastructure is in place, officers will not have the time or knowledge to fully commit to the levels of specialist support required to fulfil this type of role. On a final note some LAHOSs who completed the survey claimed to have an enhanced housing options service in place already, but no comment is offered on the effectiveness of this as none participated in the interviews. However, further investigation uncovered that these enhanced services usually incorporated help around education or employment but a few included areas such as life skills training and health promotion. It is argued that if some LAHOSs have successfully implemented a more holistic delivery model it yet again draws attention to the divergent service outcomes that may occur due to localised differences (this is considered further below). It may perhaps be worth exploring whether LAHOSs who have successfully implemented an enhanced service could provide information to other authorities around how they achieved this goal.

**Improve the service delivery environment**

The increased adoption of more generic ‘one stop shop’ types of provision was reported as making it harder for service users to access a LAHOS officer. The Government should address this in light of the fact that the Code of Guidance discourages this practice unless reception staff are fully trained to give housing advice, which was reported as not being the case. Foster (1983, p83) argued that adequate training should be provided for front of house staff, yet due to the specialised and sometimes multifaceted nature of the LAHOS role, it is viewed as impractical and expensive to train non specialist officers to provide this level of advice. Moreover, as referred to above, many authorities are struggling to provide adequate training to practitioners, let alone administrative staff.

It is proposed that all households who present are at the very least given an options interview with a specialist adviser. On a related point and following Prottas (1979), it is argued that discussing a service user’s housing issue in a public setting places them in a potentially vulnerable position and may prevent the disclosure of personal information. It is recommended that all LAHOSs ensure a private area is available at all times for service users, even if it is the first visit, to ensure all the facts are gathered in an environment which is respectful of privacy. This would be a small, but significant step toward ensuring service users feel more at ease and assist with reassuring them that their housing problem is being taken seriously.
More consistent provision of prevention services

First of all it is reiterated that the potential utility of preventative work as a positive step toward dealing with rising homelessness numbers is not questioned; rather, the main issues relate to how eligibility is assessed and the gaps in provision. As highlighted in Chapter Two sufficient housing advice and homelessness prevention is a requirement set out in the Housing Act and associated guidance, but the nature or type is left to the discretion of individual LAHOSs. This meant that some authorities offered a greater level of initiatives than others due a mixture of resource considerations, assessment of funding priorities and local availability of accommodation. Furthermore, the survey findings indicated a geographical element, whereby urban authorities were less likely to provide many prevention services and correspondingly more likely to require minimum eligibility criteria. An additional problem was that even if a given LAHOS offered a wide range of prevention initiatives, this was in many cases prioritised for vulnerable groups to save on resources and avoid rising statutory homelessness levels.

Ensuring non priority households can access more effective help would ultimately require a sea change in terms of the perception of their political priority. Arguably, for this to happen, England would need to embrace the Scottish model and remove priority need altogether (Scottish Parliament 2012). But it is hard to envisage how this can become reality in the face of fiscal retrenchment and following the asent of the Localism Act, which has effectively weakened the right to settled housing for accepted homeless households (Fitzpatrick et al 2012). Moreover, there have been reports that removal of priority need in Scotland has encouraged the use of gatekeeping to stem the increasing numbers whom councils now owe a duty to. For example the Scottish Housing Regulator (2014) identified that a number of Scottish housing option teams were applying gatekeeping in response to the newly developed political requirement to prevent homelessness. It was further identified that just under two thirds of potential homeless applicants were sent away by Glasgow council (Spurr 2014a).

With these issues in mind it is recommended as a minimum that the Government should ensure some funding is ringfenced to ensure all LAHOSs are able to offer comparable prevention services. It was found, for example, that a quarter of survey respondents did not provide rent in advance. However, to provide a truly comprehensive service, provision of these schemes would be extended to all households, and not just those with an identified priority need, as is currently operational in many LAHOSs. Although a colossal task in light
of the present uneven terrain the present ‘postcode lottery’ whereby service availability is largely determined by local connection is unjust and thus should be tackled.

**Target easing**

Following on from the previous point it is recommended that the Government ease pressures to reduce homeless acceptances, especially in an environment where households at threat of homelessness are increasing due to circumstances outside of LAHOSs control. It is also maintained, following Lipsky (1980) that specific targets tend to focus attention toward narrow goals to the detriment of other areas which may be equally important, such as preventing non priority groups from becoming homeless. This is a problematic request, as easing targets, if it had the intended effect, would ensure that prevention schemes focused on groups with limited alternative options, such as those assessed as non priority. As highlighted in the previous chapter and above, this would likely result in a corresponding rise in statutory homelessness acceptances.

**Reconsideration of funding indicators**

Although the Housing Act states that a person at threat of homelessness can present to any authority, regardless of local connection, this was the chief reason given by interviewees for unlawfully sending homeless households away. This tended, once again, to be associated with a lack of resources, such as availability of temporary accommodation. But it was further linked to workload issues, whereby officers were reluctant to take on a case which they would later refer elsewhere. Overall it was found that nearly all LAHOSs in the survey and interviews required applicants to have a local connection to access services and was more important than even priority need. When resources are tight this reluctance to provide services for households outside of the area is understandable, particularly as more generous authorities would likely experience greater footfall. It is proposed that the Government should directly relate provision of funds to the number of service users a LAHOS assists, rather than basing it on performance levels, size of authority, or any other tool of measurement. Although this is unlikely to help in respect of accepting a full homeless duty, as extra social housing would realistically be required for that aim, it may mean that authorities will be more willing to provide help via prevention schemes.
Reconsider the discretionary elements of the Localism Act
The essence of localism is conceptualised as giving local authorities more freedom to implement policies as they see fit, and tailored to the local area. Lipsky (1980, p196) suggested that a more decentralised, local focus on statutory provision may enhance the likelihood of service users becoming more involved in the public services they use. Yet it is argued that far from the Localism Act empowering local authorities, implementation was related to saving or protecting limited resources, as opposed to providing a choice. It is further argued, in line with the discussion in Chapter Two and supported by the interviews, that localism is likely to widen inequalities in some areas. It is suggested that the Government rethink the discretionary element of the Localism Act which allows authorities to discharge homeless duty into private rented accommodation, as some LAHAO’s at least may abuse this flexibility by adopting it as a gatekeeping mechanism. There is additionally the reality that service users who reside in areas where homeless duty is discharged into private rented accommodation will receive less security of tenure than those who live in areas where it is less likely to be adopted, perhaps because social accommodation is more plentiful. As with differing assessments around eligibility to prevention services, it is argued that this type of disparity in service provision is inequitable. Finally, the efficacy of locally led service delivery is not disputed in principle, but as outlined in the previous chapter, homelessness is viewed as a social policy issue requiring a central focus. This is because all manifestations of homelessness should be viewed as a serious problem requiring a coherent, determined effort to reduce all its forms.

Reconceptualise or remove the ‘Big Society’
Related to the localism agenda it was found that the Big Society could be viewed as all things to all people, therefore, it contributed little meaning in terms of delivery of LAHOSs. However, the few officers who related it to taking responsibility or ‘getting off their backsides’ suggested the Big Society, far from promoting philanthropy and inclusion was actually exacerbating negative stereotypes and further, returning to earlier conceptualisations of homelessness as an individual problem. It is recommended that the Government aim to clarify the goals of this agenda, or accept that in its current form the discursive baggage that comes with the term ‘Big Society’ is dropped.
Capitilise on frontline expertise

It was found that practitioners for the most part felt that policy makers did not seek their expertise and were reluctant to involve themselves in service delivery. This was despite suggestions that legislators were for the most part ignorant of the challenges that frontline staff faced. For instance, an assistant director of housing services in one authority stated that all politicians she had met still held the view that homelessness referred to people on park benches and didn’t seem aware of its hidden elements. This is a real concern, because if those charged with creating policy in this area fail to grasp its nature, the said policies may ultimately be ineffective in respect of some groups who are affected by homelessness. This may further go some way toward an understanding of why funding streams focus on more visual (statutory or literally) homeless groups. It is argued that politicians are overlooking a valuable resource and should set up better communication channels with local authorities. For instance, a more effective flow of communication would ensure that if changes to the Housing Act were considered, this could be informed by those who have a greater appreciation of where ambiguities or contradictions exist.

Engage service users

This thesis has revealed that service users have a limited understanding of housing policy or the service they should expect to receive. It is proposed that LAHOSs are guided to think of ways to ensure service users are more actively involved if they approach for help. A relatively straightforward option is to look at providing a user friendly guide which clearly outlines a service users rights and the authority’s legal responsibilities. Although this will essentially involve extra cost to some it is argued that this is relatively small, and in the spirit of empowering service users, a necessary provision. Further, in light of findings that households at threat of homelessness tend to be isolated, creating opportunities that allow service users to meet with legislators and discuss the experience of using LAHOSs would provide an invaluable glimpse into how policy is working in practice. However, those who arguably need to be heard over statutory groups, such as households who are sent away with limited assistance, would be less likely to be offered this type of opportunity. Moreover, if we consider that professionals within LAHOSs feel unable to influence policy outcomes, it is argued that the service users who occupy the lowest rung in the policy chain are even less likely to be given a platform for their views.
Ensure legal help organisations are adequately resourced

In an ideal world unlawful gatekeeping would not take place in LAHOSs, but in light of evidence of its widespread presence access to legal help in the event of this outcome is essential for service users. It is argued that the current situation, whereby differing access to legal advice is based on area of residence is unjust and the Government should ensure representation is available and offered to all who require it. However, a cynic might suggest that stemming the tide of reduced availability of legal representation will not be a priority for the current administration, as evidence suggests these services effectively raise statutory homelessness presentations by challenging negative decisions or illegal gatekeeping. A further point to highlight is that details of legal aid specialists was only provided when a negative decision was reached, so households who received advice or assistance only would not generally be provided with this. It is urged that all households who approach LAHOSs are advised of where they can seek legal help as part of good practice, regardless of whether an official decision has been given.

Statutory housing provision and older people

Reconceptualise assessment of vulnerability due to older age

The survey found that over a quarter of decision makers felt that vulnerability due to older age could benefit from clarification, this rose to over 40% in respect of officers responsible for determining statutory homelessness applications. It was further argued in Chapter One that the use of over 60 as a guiding threshold in assessment of vulnerability was provided without sufficient reasoning. Therefore its utility as a tool for determining priority need was argued to be deficient, particularly as frontline officers are directed that age alone should not guide decisions in any case. It is recommended that policy makers link in with an active ageing paradigm to rethink current policy around vulnerability on the basis of older age, thus incorporating the social, physical, individual and cultural environment (WHO 2002).

In this vein it is proposed that the Code of Guidance is fleshed out to include a chapter on older groups alongside the current chapter which focuses on young people. This should attempt to fuse the reality revealed in research findings that older people have qualitatively distinct issues, yet with an appreciation that negative stereotypes, particularly relating to frail older people, may hinder the provision of targeted, appropriate assistance, particularly with
regard to ‘younger old’ cohorts. More specifically it should provide clearer guidelines for interpreting vulnerability due to older age and more explicitly frame how ageing may interact with other issues, such as those relating to health or institutionalisation, for example. This would be no mean feat, as it would require a shift in emphasis away from treating older age as an issue dotted on the periphery of homelessness, or factored into social care concerns. In short, ensuring older people become an integral part of housing legislation would involve a qualitative shift not seen in the history of homelessness policy. A further issue is that historically British Governments have tended to concern themselves with short term, immediate goals rather than taking a longstanding approach. It is argued that the latter is necessary if all types of homelessness are to be effectively tackled.

*Explore tailored hostel accommodation options*

Despite findings discussed in Chapter Three that older people would benefit from hostels which catered specifically for their age group, the interviews uncovered no accommodation of this type, whereby most areas could access hostels for people under 25. In fact an internet search throughout the UK revealed that specialised emergency housing was far more prevalent for younger groups. It was identified that shortages in this type of accommodation may have been due to a perception that ‘younger old’ cohorts did not require tailored facilities. The intention is not to imply that younger people have smooth access to this type of accommodation, but rather that they have been acknowledged, in contrast to older people, as a group who can benefit from specialist provision.

The inadequacy of emergency accommodation for older people is difficult to address in a climate where, if anything, hostels are closing down, as highlighted in Chapters Two and Three. But it is proposed that as a minimum both LAHOSs and non statutory providers should consider if generic hostel accommodation can be reorganised in some way; perhaps specific areas can be reserved for older people, for instance. For future projects, it is recommended that local authorities assess whether providing a hostel exclusively for older people would benefit the community. Of course, this may be difficult, particularly if homeless older people are hidden or do not approach services in the first place. Another option may be to seek funding from larger organisations such as the Lottery Fund, who have recently granted £112 million to assist organisations to better coordinate services aimed at homeless people with mental health issues (Spurr 2014). It is viewed as important to reiterate that recommendations relating to age segregated accommodation are supported by research.
findings, discussed in Chapter Three, which show that this was expressly preferred by many older homeless study participants. But it is by no means assumed to be the preference of all older people who require a hostel (in the same way as it could not be supposed that all younger people prefer accommodation aimed at their particular age group).

Private rented accommodation

It has been highlighted that for many older people affected by homelessness, private rented accommodation is increasingly becoming the only viable housing option, with Rugg and Croucher (2010) predicting that this tenure was set to be even greater utilised in an austere climate. They suggested that the local authorities should develop initiatives aimed specifically for this group, such as keeping a list of adapted properties available to privately rent. It was further recommended that a specialist adviser who could liaise with landlords should be made available. While LAHOSs may not be able to devote significant funds to initiatives such as those suggested by Rugg and Croucher (2010), if lists of available private rented properties are collated in any case, it should not take much additional effort to collect information relating to adaptations.

Ensure practitioners are aware of local service provision

Parry and Means (1999) maintained that a one stop shop style of advice was ideally required for older people, which would essentially involve the employment of highly specialised members of staff from a number of different departments. Yet the survey and interview findings show that this type of assistance is far from reality and at present local knowledge around non statutory (and even statutory) provision for older people appeared piecemeal. This meant that even where services were available, many interviewees did not acknowledge their existence. This may have been due to the workload pressures of individual officers, but could be attributable to the relative isolation reported by many LAHOSs, which may negatively impact on communication channels with non statutory services in the area.

Preferably all LAHOSs would contain an adviser with specialised knowledge of the factors which may affect older people, as is due to become reality in two of the authorities’ interviewed. Yet in the current austere political climate it is accepted that providing this type of targeted provision may not be viable. It is therefore advised that LAHOSs set up a dedicated database or similar system to ensure practitioners can access up to date information regarding initiatives in the local area aimed at older people (and by extension all service
users). At the very least LAHOSs should ensure an officer is responsible for liaising with organisations so they know where older people affected by homelessness may seek additional help or support. However, strong direction will be necessary to ensure it is not applied unevenly, as is the current case with prevention provision.

Provision of awareness training
As reiterated throughout this thesis, interviewees appeared to either view older people in a pathological light, or failed to distinguish their needs from younger cohorts. It is suggested that LAHOSs would benefit from awareness training around older people who experience housing difficulty or homelessness. This would ensure that resources can be better targeted toward the wider needs of this group. Of most importance, it should highlight that while older people have qualitatively distinct needs to that of younger cohorts, the ‘younger old’ feel the effects of economic change and welfare reform (with the exception of the shared room rate) to the same extent as their younger counterparts. National organisations that provide specialist advice to older people, such as AgeUK, would ideally suit this purpose and aside from time, the costs should be relatively low to implement. It is expected that organisations who assist older people would welcome the opportunity to enhance an understanding of the issues of their main client group. However, these observations are essentially speculative at this stage and would need to be explored in greater detail.

Wider dissemination of service provision
Although this thesis did not seek the views of older people, the literature discussed in Chapter Three showed that this group were less likely to access housing advice or homelessness services than their younger counterparts. As discussed in Chapter Three, Crane et al (2004) identified six pathways and 18 potential factors that may contribute toward homelessness in respect of older people. They further asserted that in many cases rooflessness could have been avoided if agencies had intervened at an early stage. They argued that tackling the causes of homelessness in respect of older people required a multi agency approach, particularly in the later stages where particular types of preventative work may no longer be possible. Some suggestions included social housing staff, health care providers (not just hospitals, but GP’s), and tenancy support services, all who have the ability to pick up on health, affordability, or anti social behaviour issues at an earlier stage (Crane et al, 2004). Although support services may not be so readily available with the removal of the ringfence around supporting people funding, organisations such as social housing departments or GP
surgeries could potentially play an invaluable role in liaising with LAHOSs if a housing or related issue (such as debt) is disclosed to them. Yet despite partnership working being set out as a requirement in policy, the interviews suggested that this was not taking place in reality. Yet in light of arguments that older people affected by homelessness are more likely to present with complex issues and multiple support needs, it is suggested that these closer links would in the long run prove beneficial not only to service users, but LAHOSs themselves. For example it may assist in identifying a housing issue earlier on and may avoid homelessness at later stages. On a related point it is recommended that policy makers consider ways to ensure older people are both aware of and feel able to access services if they become at threat of homelessness. Ways of extending awareness could involve publishing details of LAHOSs in local newspapers, community centres, GP surgeries or through TSO’s such as AgeUK. This may serve the additional function of local organisations gaining a greater understanding of what LAHOS do and could perhaps improve partnership working where this is lacking.

**Further research**
This final section considers particular areas which would profit from further research, either because the topic went beyond the scope of this thesis, or due to the issue being highlighted during the literature review or fieldwork.

*Qualitative investigations in Southern areas*
Although the survey incorporated all LAHOSs in England, the qualitative phase, due to resource issues, was limited to Northern areas. Although many LAHOSs who took part in the interviews reported severe shortages, qualitative research which incorporates Southern regions, particularly London, is needed. This is due to findings which indicate that political austerity is impacting on these areas to an even greater extent than Northern parts of England (Fitzpatrick et al 2012). Furthermore, interviewees intimated that they were aware, both anecdotally and through particular examples, that London LAHOSs were facing higher levels of pressure. In respect of the latter this was mainly attributed to a greater shortage of overall housing and the elevated relative price of private rented accommodation. Therefore, based on these findings it is predicted that London and specific Southern areas will exercise gatekeeping and conditional provision of prevention schemes or homelessness services to a greater extent than the interview participants of this thesis.
Seek views of those at threat of homelessness

This thesis has broadly supported findings which suggest service users have a very limited ability to affect the quality of help they receive and non vulnerable groups in particular may be provided with ineffective provision. It is suggested that the views of older service users who are not owed a homelessness duty and are deemed ineligible for prevention funding are accessed. In fact, undertaking this research in respect of any age group at threat of homelessness would provide a unique lens into what constitutes a significant proportion of the people LAHOS workers see on a day to day basis. This recommendation is based on findings that this group are the most likely to become homeless (either hidden or roofless) due to falling between the gaps of provision. Thus gaining their views and trajectories before homelessness actually occurs would be an invaluable way to gain a greater understanding of the barriers to suitable housing experienced by this group. At present no sample frame in respect of households who receive limited assistance is available, and it would be tricky to request this as LAHOSs may be reluctant to provide details of those who they were unable to help. However, this would be assisted if authorities were required to record all households who approached services. This would also provide policy makers with a greater appreciation of the actual number of households who seek LAHOSs (though ensuring accurate recording of data would remain an issue).

Research which focuses on characteristics of older people affected by homelessness

What is clear from the limited references found for the purposes of this thesis is that there is a paucity of investigations focusing on more specific types of older person who may become homeless and their status as a user of LAHOSs. More research is needed to consider how particular characteristics of older age, such as gender or ethnicity, may interlink with the services that an older user at threat of homelessness can expect to receive.

Conclusions

The recommendations above inevitably call for an injection of resources, which runs counter to the main Government drive toward reducing public spending. However, as an essential service, it is argued that ensuring statutory homelessness departments are provided with suitably qualified staff and sufficient options to stem homelessness is necessary and the provision of funding to help achieve this should not be skimmed. Furthermore, if politicians are genuinely motivated to reducing homelessness, this should relate to all forms, not just the most visible. In a similar vein tailored accommodation and services for older people need to
be extended due to findings which show that current provision is inadequate. With specific regard to vulnerability as a result of older age, it is argued that current policy guidelines are insufficient and pay scant attention to the unique needs of this group.

It is accepted that even if all the above recommendations were put into place, the action or views of individual staff members will nevertheless impinge on the decision making process and that ultimately, divergence is a necessary element of LAHOS provision, dealing as it does with complex human problems. In fact, this thesis supports the point made by Foster (1983, p108) that attempts to eliminate discretion also removes its more positive elements, such as the ability to tailor assistance to the individual. But it is argued that the motivation to exercise negative or illegitimate discretion would lessen if adequate training and extra resources were provided alongside a decrease in central pressure to obtain specific performance outcomes. Decision making could then be formed around a greater focus on applying housing policy, without being clouded unnecessarily by organisational imperatives or role ambiguity. Alongside this ensuring that TSO’s exist to scrutinise decisions will add a further protective layer (as long as service users have the ability to access them).
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I am a PhD student based at The University of Sheffield and the purpose of this survey is to gain an improved understanding of the role of a Housing Options Adviser. My interest in this topic is primarily due to my own experience, spanning over a decade, of working in statutory housing option services. Although I appreciate that you are busy I would be very grateful if you could give around 10 minutes of your time to complete this survey, or please distribute to a Housing Options Adviser based in your department. For the purposes of this survey the term ‘Housing Option Adviser’ refers to all Statutory Homelessness Officers or Homelessness Prevention Staff. Your response is very important to this research, as a varied representation of statutory housing option services is required to present an accurate picture of the views of those employed in this role. Though I would ask that where possible all questions are answered, if you do not wish to answer a specific question then please skip and go to the next question. Your participation in this survey is voluntary, you are not obliged to take part and are free to withdraw at any time. Please be assured that all respondents and local authorities who participate will remain completely confidential. A doctoral thesis, academic reports and publications will be produced as part of the project but neither you nor the local authority that you work for will be able to be identified in any work emanating from the project. Once my research is complete a summary of the results may be forwarded to your organisation, but only if you provide an email address. Without an email address I will not be able to identify your organisation. If you wish to discuss this project in further detail, or raise any concerns you can contact me on email: sop11sla@sheffield.ac.uk, telephone: …………, or by post at: The University of Sheffield, Department of Sociological Studies, Elmfield, Northumberland Road, Sheffield S10 2TU. This project is supervised by Professor Alan Walker, who may be contacted by email: a.c.walker@sheffield.ac.uk, telephone: 0114 222 6466 or by post at: The University of Sheffield, Department of Sociological Studies, Elmfield, Northumberland Road, Sheffield S10 2TU. I would be grateful if you could return the completed questionnaire by 12 December 2012. Many thanks Sarah Alden
Q1 Your role (please tick as appropriate)
- Senior/Managerial (1)
- Housing Options Adviser (2)
- Other (please state) (3) ____________________

Q2 How many employees work in the housing options team within your organisation? (please tick as appropriate)
- 0-5 (1)
- 6-10 (2)
- 11-20 (3)
- Over 20 (4)

Q3 What area(s) does your local authority provide a service for? (please tick as appropriate)
- Mainly rural areas (1)
- Mainly urban areas (2)
- A mixture of both rural and urban areas (3)

Q4 What is the process of accepting a household as statutorily homeless in your department? (please tick all that apply)
- Housing Options Adviser agrees all decisions (1)
- Approval by Manager/Senior Officer prior to all decisions (2)
- Manager/Senior Officer approves intentional decisions (3)
- Manager/Senior Officer approves complex decisions (4)
- Other (please state) (5) ____________________

Q5 When a household presents to your authority as homeless what procedure is usually followed for each of the categories of household listed below? (please tick all that apply)

<table>
<thead>
<tr>
<th>Category</th>
<th>Initially seen on front desk (1)</th>
<th>Given a housing options interview (2)</th>
<th>A homeless application is taken in the first instance (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Believed to be priority need, threatened with homelessness (1)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Believed to be priority need, literally homeless (2)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Believed to be non priority, threatened with homelessness (3)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Believed to be non priority, literally homeless (4)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
Q6 If an older person presents as homeless to your authority in what circumstances would they normally be viewed to have a priority need? (tick all that apply)

☐ If they are over 50 (1)
☐ If they are over 60 (2)
☐ If they are over 70 (3)
☐ Would normally need an additional vulnerability (such as a health issue) to be deemed to have a priority need (4)
☐ Assessment of vulnerability would depend on the judgment of the caseworker assessing the application (5)

Q7 Do you offer any prevention services specifically for people over 50?

☐ Yes (1)
☐ No (2)

Q8 What is your view of non statutory services available exclusively for people over 50 at threat of homelessness in your authority's local area?

☐ A good mix of specialist services (1)
☐ A few specialist services but more are needed (2)
☐ Not aware of any specialist services (3)

Q9 In the last 12 months have statutory homelessness acceptances in your area? (please tick as appropriate)

☐ Reduced (1)
☐ Increased (2)
☐ Has remained roughly the same (3)

Q10 Based on feedback or your own experience, what do Housing Option Officers feel are the current challenges facing the service? (tick all that apply)

☐ Reduction of local housing allowance (1)
☐ Budgetary cuts in the department (2)
☐ Less security of own role (i.e. due to redundancy) (3)
☐ Lack of available social housing (4)
☐ Lack of available private rented housing (5)
☐ Decrease in availability of hostel/supported accommodation (6)
☐ Mortgage repossession (7)
☐ Increase in statutory acceptances (8)
☐ General effects of the economic downturn (9)
☐ Welfare reform (10)
☐ Other (please state) (11) __________________

Q11 If you ticked any of the boxes in question 10 in what ways may these issues impact upon the ability of a Housing Options Adviser to undertake their role? (tick all that apply)

☐ Unable to provide adequate advice/assistance to all who seek it regardless of priority need (1)
☐ Use of unacceptable alternatives due to lack of availability of suitable accommodation (2)
Officer struggle to keep within statutory decision targets due to workload (3)
Other (please state) (4) __________________________

Q12 Are there any charities in your area who offer advice to service users who may be unhappy with particular decisions made in your department?
☐ Yes (1)
☐ No (2)

Q13 If your authority offers any of the prevention schemes listed below, can you please indicate if service users need to meet an eligibility criteria? (tick all that apply for each prevention initiative)

<table>
<thead>
<tr>
<th>Prevention Initiative</th>
<th>Local connection (1)</th>
<th>Priority need status (2)</th>
<th>Not intentionally homeless (3)</th>
<th>No Criteria (4)</th>
<th>Do not offer this service (5)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent bond Scheme (1)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Rent in advance payment (2)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Mortgage Rescue scheme (Government) (3)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Mortgage Rescue Scheme (local) (4)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Welfare benefit/debt advice (5)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Mediation services (6)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Home visits in family breakdown cases (7)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Referral to local hostels (8)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Referral to out of area hostels (9)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
<tr>
<td>Liaison with accommodation/mortgage provider (10)</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
<td>❑</td>
</tr>
</tbody>
</table>
Q14 If your authority offers any of the prevention initiatives listed below, can you please indicate for each who is responsible for determining if a service user is eligible for the scheme?

<table>
<thead>
<tr>
<th>Initiative</th>
<th>Designated Officer (1)</th>
<th>Housing Options Caseworker (2)</th>
<th>Manager or Senior Officer (3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rent Deposit Scheme (1)</td>
<td>○</td>
<td>○</td>
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</tr>
<tr>
<td>Mortgage Rescue scheme (Government) (2)</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>Mortgage Rescue Scheme (local) (3)</td>
<td>○</td>
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<tr>
<td>Welfare benefit/debt advice (4)</td>
<td>○</td>
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<tr>
<td>Mediation services (5)</td>
<td>○</td>
<td>○</td>
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<tr>
<td>Home visits in family breakdown cases (6)</td>
<td>○</td>
<td>○</td>
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<tr>
<td>Referral to local hostels (7)</td>
<td>○</td>
<td>○</td>
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</tr>
<tr>
<td>Referral to out of area hostels (8)</td>
<td>○</td>
<td>○</td>
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</tr>
<tr>
<td>Payment of rent in advance (9)</td>
<td>○</td>
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</tr>
</tbody>
</table>

Q15 What are your views on the 1996 Housing Act? (please tick all that apply)

- Feel the Act is adequate (1)
- It should make the meaning of vulnerable groups due to mental health more explicit (2)
- It should make the meaning of vulnerable groups due to physical health more explicit (3)
- It should make the meaning of vulnerable groups due to being institutionalised more explicit (4)
- It should make the meaning of vulnerable groups due to violence more explicit (5)
- It should make the meaning of vulnerability due to age more explicit (6)
- It should make the meaning of vulnerability as a result of being a care leaver more explicit (7)
- It should make clearer whether 16/17 year olds are the responsibility of housing or social services (8)
- It should make the meaning of vulnerability due to a ‘special reason’ more explicit (9)
- It should be more explicit on what constitutes a homeless person (10)
- It should be more explicit on what constitutes a local connection (11)
- It should be more explicit on what constitutes eligibility (12)
- It should be more explicit on what constitutes an intentionally homeless household (13)
- Other (14) ____________________

Q16 Is there anything you would like to add that has not been covered in this survey? (if yes please state)
APPENDIX TWO

Administration of the Survey to LAHOSs

Dates: 17-18.07.12
An email was sent to all LAHOSs general inboxes requesting details of the manager or team leader; some came back as undeliverable and in these cases the researcher checked online for an alternative email address. If this was not forthcoming a list of local authorities to telephone was gathered so they could be contacted direct. The number of LAHOSs that required telephone contact was around 15. Due to call waiting, and the need in some cases to provide further details regarding the research, this stage proved to be more time consuming than originally anticipated, but in cases where there was an opportunity to discuss the topic, it provided a level of rapport and may have assisted with response rate.

Of the LAHOSs who responded via email, a few would not provide details of their team leader/manager, and suggested that the survey should be forwarded to a general email address. In these cases the organisation in question was either phoned direct to gain the information, or the direct email address was obtained via the internet once the name of the relevant person was provided. In respect of the latter it was considered whether it was ethical to access the email details despite being advised to forward it directly to the team. But it was viewed that this action was justified due to the required information being freely available on a public domain (the internet).

Date: 14.08.12
Follow up emails were sent to representatives who had not yet responded to the initial request for details, this accounted for around 20% of LAHOSs.

Dates: 28-30.08.12
The LAHOSs who had not responded to follow up emails (16) were contacted by telephone to request details of the relevant team leader/manager. As stated above contacting authorities in this way proved very time consuming. For example, as many LAHOS departments were busy the researcher was sometimes kept on hold for 10 minutes or more; if a message was left local authorities did not return the call in most cases. When the researcher managed to get
through a few LAHOSs appeared distrustful when asked for details of their manager or team leader and asked several questions before providing the details.

The name of the appropriate manager was not obtained in six cases; this was due to reluctance of the local authority to provide these details and an inability to find this information elsewhere. It was decided that the most suitable course of action was to send the survey to the general housing options email address and request that it was forwarded to the most suitable staff member. It was viewed as inappropriate to push for the information required, as this may have caused hostility, thus the survey would subsequently be less likely to be completed.

Throughout the process a number of public sector employees (generally supervisory or managerial staff) got in touch to request further information with regard to the research objectives; in only two cases did the worker appear hostile. As discussed above while a few public sector employees had got in touch to say they would be too busy to complete the survey, in some cases further correspondence and clarification of the aims of the research ensured participation.

Date: 13.11.12
The surveys were sent out to all LAHOSs, with more detailed information regarding its purpose, the closing date given was the 15.12.12. The emails were tailored to each authority who had got in touch following initial contact; for those who had not been in touch a standard email with a scripted statement of purpose was forwarded. Around 20 emails came back as undeliverable; in these cases the researcher doubled check the addresses. In two instances the email address had been incorrectly inputted, in other cases it was not immediately apparent why the addresses had failed to deliver. The relevant authorities were therefore contacted by telephone to gather the correct email details.

Date: 27.11.12
A reminder was sent out to all non respondents, this stipulated that those who had already completed the survey but had not provided details of their LAHOS should provide confirmation to ensure they would not be contacted on subsequent occasions. It reiterated that a better than expected response rate (n = 175) had been achieved, and also reminded
recipients that a summary report would be provided. Responses were dealt with as discussed above.

Date: 12.12.12
A second reminder email was sent out, this reiterated the high response rate (n = 230), and made it clearer that a comprehensive summary of the research would be provided to participating authorities. This encouraged those who had not provided an email address on the survey to let the researcher know they had completed it. It also extended the cut off date to the 31.12.12. As the number of participating LAHOSs had reached around two thirds the decision was made to send out no further reminders.

At a later date it was discovered that Two LAHOSs had not received the survey, it is unclear why this occurred, but by the time the error was identified the completion date had lapsed, and analysis had commenced. It was therefore too late to re-send the surveys to the correct email addresses. However, it did not appear that these particular organisations, at least on the surface, differed in any way to the authorities who received the questionnaire. Further, one survey was accidently forwarded to a Scottish LAHOS which needed to be removed before the final analysis was carried out.

In a few cases (n = 5) the team leader forwarded the survey to all members of staff, and more than one completed the survey. It is felt this would be an interesting way to compare members of staff within the same LAHAS, particularly to questions relating to austerity and elements of the Housing Act 1996. However, these were weighted for questions that refer to authority type and decision making processes.
APPENDIX THREE

Interview Guide – LAHOS practitioners

1. Housing options/statutory homeless process
2. Worked in any other local authority in a similar role
3. Ways in which role has changed over time
4. Homelessness increased in the last few years
5. Changes to welfare and housing policy [LHA, localism, Welfare Reform Bill – consequences]
6. Local authority finance cuts
7. Specific housing options available for older service users
8. How is priority assessed for older people
9. How well provided are older people locally
10. Training/Staff targets
11. Relationship with legal agencies/charities [legal challenges]
12. Thoughts on Housing Act/caselaw
13. Relationship with other local authorities
14. Do self or work colleagues ever differ on particular areas of service delivery
15. Can housing option services influence central policy
16. What would an ideal service look like
APPENDIX FOUR

Interview Guide – Senior Officer

1. Length of employment current role
2. Main purpose of role [why]
3. Worked in any other authority [where, any differences]
4. Has role changed recently [extent, reasons]
5. Work relationship with staff
6. Disagreed with a particular action taken by a member of staff [How dealt, why]
7. Services available for older people/or lack of
8. Customer feedback [discussion, issues]
9. Relationship with legal agencies/charities [i.e. legal challenges]
10. Staff targets, incentives
11. Changes to welfare and housing policy- impact on role [LHA, localism, welfare reform]
12. Areas of service delivery that could be improved [which, barriers]
13. Views of housing act 1996
14. Most/least satisfying aspect of role
15. What would an ideal service look like [for older people, general population]
APPENDIX FIVE
Interview Guide – Third Sector Organisation

1. Assist clients who require advice due to services received within statutory housing/homelessness services [main types deal with]
2. Relationship with LAHOS
3. Do older client’s access service? [any differences]
4. Any differences in how older people are treated, service quality
5. Views on national/local priorities for all service users/older people
6. Successfully challenge LAHOS [when, examples]
7. Do LAHOS err in service delivery [why]
8. Changes in the last few years [numbers/types of people who access services , why]
9. How is organisation funded [any changes in recent years]
10. How view changes to welfare and housing policy [impact on service delivery]
11. Can third sector make a difference to the ways in which LAHOSs deal with service users [how]
12. Views of what an ideal service would be for older people/general population
APPENDIX SIX

Information Sheet for Local Authority Statutory Housing Options Team

The purpose of this project is to gain an improved understanding of the Statutory Housing Options Advisor role as part of a PhD at the University of Sheffield. I aim to do this by asking about the work that you do on a day to day basis, and gathering your views on the issues that you feel impact upon your role. I am particularly interested in older service users at threat of homelessness, and some questions will relate specifically to this group.

The reason you have been chosen to take part in this research is because you are employed as a Housing Options Advisor for a local authority (for the purposes of this project Housing Options Advisor refers to employees who work in either housing options or homelessness prevention).

You are not obliged to take part in this research and have the right to withdraw at any time if you wish to do so, without having to give a reason. It is not foreseen that there are any risks and the only inconvenience anticipated is the time you give to participate in the interview. Whilst there are no immediate benefits for participants, it is hoped that this research will contribute toward a greater understanding of the work that Housing Options Advisors do, and perhaps to highlight any issues within the role that need to be considered when policy makers look to legislate on housing matters.

All the information that is collected during the course of the research will be kept strictly confidential. A doctoral thesis, academic reports and publications will be produced as part of the project but neither you nor the local authority that you work for will be able to be identified in any work emanating from the project.

To ensure I can document the interview as accurately as possible my preference is to use an audio recorder to tape interviews. No other use will be made of the recording, and no one outside the project will be allowed access to the original recordings. The recording will be kept in a locked drawer in my private office, all transcriptions will be stored on a personal computer, and will be password protected. If you would prefer not to be recorded please request this and I will take written notes.

This project is sponsored by the University of Sheffield and has been ethically approved by the Department of Sociological Studies ethics review.

If you wish to discuss this project in further detail, or raise any concerns you can contact me on email: sop11sla@sheffield.ac.uk, telephone: 07809446981, or by post at: The University of Sheffield, Department of Sociological Studies, Elmfield, Northumberland Road, Sheffield S10 2TU. This project is supervised by Professor Alan Walker, who may be contacted by email: a.c.walker@sheffield.ac.uk, telephone: 0114 222 6466 or by post at: The University of Sheffield, Department of Sociological Studies, Elmfield, Northumberland Road, Sheffield S10 2TU.

A written summary of my findings will be provided on completion of the research.
APPENDIX SEVEN
Copy of Ethics Approval Form

The University Of Sheffield.

Sarah Alden
Department of Sociological Studies

7 November 2012

Dear Sarah

PROJECT TITLE: Applying an implementation perspective to assess delivery of statutory housing advice services to older people at threat of homelessness

On behalf of the University ethics reviewers who reviewed your project, I am pleased to inform you that on 6 November 2012 the above-named project was approved on ethics grounds, on the basis that you will adhere to the following documents that you submitted for ethics review:

- A completed research ethics application form and consent form (dated 28 July 2012)
- Participant information sheet for Housing Options Team (dated 5 October 2012)
- Participant information sheet for Third Sector Practitioner (dated 5 October 2012)
- Informed consent form (dated 1 August 2012)
- Interview guide Housing Options (dated 1 August 2012)
- Interview guide Third Sector (dated 1 August 2012)
- Synopsis of research (dated 1 August 2012)

If during the course of the project you need to deviate from the above-approved documents please inform me. Written approval will be required for significant deviations from or significant changes to the above-approved documents. Please also inform me should you decide to terminate the project prematurely.

Yours sincerely

Dr Afu Twum-Danso Imoh
Department Ethics Co-ordinator