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## Personalisation under the Homelessness Reduction Act 2017: how personal are personal housing plans?

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### ABSTRACT

This article explores the personalisation of homelessness services in the context of the Homelessness Reduction Act 2017. This ambitious piece of legislative reform introduced requirements on local housing authorities in England to assess an individual's circumstances and develop personalised housing plans for people experiencing homelessness (s.3 HRA 2017, inserting s.189A Housing Act 1996). This article analyses research data (including 26 interviews) collected in 2018–2019 from ethnographic studies completed in two local authorities in the Midlands, across a period of four months in each site. Exploring the implementation of personalised housing plans in practice, this article investigates barriers to the application of the personalisation narrative, finding it operates as a tool of neoliberal governance rather than one of social justice. It asserts that if personalisation has the potential for more satisfactory and sustainable outcomes in preventing and relieving homelessness, then the inability for this narrative to manifest suggests the goal of the HRA 2017 in 'reducing homelessness' is being hampered.

### KEYWORDS

Homelessness;  
Homelessness Reduction Act 2017; Personal housing plans; Personalisation; ethnography

## Introduction

This article contributes to the continued debate on the contested narrative of personalisation and its meaning and implication in public services. Broadly speaking, personalisation is the tailoring of services to meet the particular needs of the individual and has been widely critiqued as the basis for social service provision, most notably in the field of social care (Ferguson 2007, Tarrant 2020). This article explores personalisation in the specific context of homelessness service delivery in England, where the Homelessness Reduction Act 2017 (hereafter HRA 2017) has introduced requirements on local authorities to assess an individual's circumstances and develop personalised housing plans for people experiencing homelessness (s.3 HRA 2017, inserting s.189A Housing Act 1996).

With a bold title and ambitious aims, the HRA 2017 came into force in April 2018, carrying with it high expectations. The then chief executive of Crisis labelled the Act 'a big step in the right direction towards ending homelessness for good' and promised, '[a]ll homeless people will now be entitled to more meaningful support from their local council' (Sparkes 2018). It represented the most

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significant reform in the last 40 years to the English statutory framework governing the duties of local authorities towards people experiencing homelessness. Bob Blackman, the MP responsible for sponsoring the Homelessness Reduction Bill, claimed it would revolutionise the culture in local authorities ‘away from a crisis response towards prevention strategies and a more compassionate approach to helping people who are in that desperate crisis’ (HC Deb 2016a, col 543–544).

To date, there has been some published academic analysis of the provisions of the HRA 2017 (Arden 2018, Rubens and Moss 2018, Cowan 2019, Hunter 2020, Bevan 2021a, 2021b), and none exploring the implementation of the Act on the frontline. Building on policy reports published on the HRA (Garvie 2017, LGA 2019a, 2019b, MHCLG 2020a; and of course, the England Homelessness Monitors from 2019 to present), this is the first academic exploration of how an element of the new provisions of the HRA 2017 are working in practice. Drawing on data collected from an ethnographic research project conducted over 2018–2019, this article questions how personal are personal housing plans in practice?

This is an important time to be reflecting on the workings of homelessness statutory provisions in England given the most recent data reports from the Department of Levelling Up, Housing and Communities (DLUHC) show another increase in homelessness presentations to local authorities, and a continuously deepening temporary accommodation crisis (DLUHC 2024b). On September 2023, 109,000 households were in temporary accommodation, a 10.3% increase from the previous year, with the largest increase being households with children (DLUHC 2024b, 10.1). The Guardian recently reported thousands of households living in temporary accommodation for more than a decade, with children living their ‘entire childhoods’ in temporary accommodation (Savage 2024). The DLUHC report further cites the end of an Assured Shorthold Tenancy as the most common reason for experiences of homelessness (DLUHC 2024b, 4.1), with local authorities predicting this will only keep increasing (Fitzpatrick *et al.* 2023).

This article will first briefly introduce the concept of personalisation and its history in public services. It will then explore how personalisation has become embedded within the statutory framework for duties on local authorities towards people experiencing homelessness. The rest of the article will move on to investigate how the personalisation provisions are being implemented on the frontline, first outlining the methods of data collection and then reporting on key findings from the data representing the identification of barriers to the implementation of the personalisation narrative. These barriers are that authorities used techniques like preformatting housing plans to reduce the administrative burden on housing officers; the economic conditions in the local housing market reduced the extent of the choice applicants could exercise; and the underlying power relations between the authority and the applicant precluded the applicant refusing a plan, even one which did not reflect their personal wishes. It will finish with an analysis which asserts that the introduction of personalisation created two conflicting narratives, one of ‘social justice’, and one of ‘neoliberalism’ (Mladenov *et al.* 2015), with the neoliberal narrative ultimately prevailing. It takes this a step further and, alongside other early critiques of the Act (Cowan 2019, Bevan 2021a, 2021b), exposes the HRA 2017 as a tool of neoliberal governance.

## Personalisation in public service

Personalisation in public services has an interesting history, and will be overviewed only briefly here as it is covered extensively elsewhere by key contributors to the personalisation debate (Glasby and Littlechild 2009, Needham 2011, Beresford 2009, 2013), and by Alison Tarrant in an earlier issue of this very journal (2020).

Personalisation is associated with public service interventions which aim to modify the service to meet the specific circumstances facing individual users. It is often also referred to as individualised or tailored services, or person-centred support (Joseph Rowntree Foundation 2011). Its connotations are 'overwhelmingly positive', promising to empower and promote choice in the delivery of public service (Ferguson 2007).

Initially emerging from grassroots disabled people's movements in their campaigns for independent living, the personalisation narrative has spread quickly through social care policy and out into other areas including housing, welfare, criminal justice, education, and healthcare (Needham 2011). Most notably within social care, personalisation has become largely synonymous with the provision of personal budgets: a notional sum of money for individual service users to spend on support and services, either through receipt of a direct payment to themselves or through a local authority or third-party commissioning services on their behalf (Tarrant 2020). Under the Care Act 2014, local authorities are now under an obligation to provide personal budgets to people receiving care and support (s.25(1)(e)). The use of personal budgets in particular as a mechanism of personalisation has attracted more popularity in other public sector areas including in health provision and meeting special educational needs (Department of Health and Social Care 2012; The Special Educational Needs (Personal Budgets) Regulations 2014, SI 2014/1652). Their promise to offer greater choice, control and independence for people with complex health and social care needs has encouraged an exploration of their use in the housing and homelessness context for people experiencing rough sleeping (Blackender and Prestidge 2014, Mackie *et al.* 2019).

Personalisation as a narrative of policy change has attracted wide reaching political popularity. It was introduced into the broader policy sphere on the back of a report by the think tank Demos in 2004, authored by Charles Leadbeater (Leadbeater 2004). Here Leadbeater presents what he asserts is a simple understanding of personalisation: 'by putting users at the heart of services, enabling them to become participants in the design and delivery, services will be more effective by mobilising millions of people as coproducers of the public goods they value' (p.19). If individuals can be encouraged to be more adept at self-assessing and self-managing health, education, welfare and taxes this in turn enhances the states capacity to deliver better services with limited resources (Leadbeater 2004, p. 17).

The narrative of personalisation is suggested however to carry some ambiguity despite Leadbeater's assertion of simplicity, but it is exactly this ambiguity that enables it to carry traction across political parties and into various public spheres (Ferguson 2007). Personalisation has been positioned as a tool for achieving a variety of different aims. Within the grassroots movements, personalisation is linked strongly with social justice; playing a key role in facilitating independent living, enabling disabled people to have self-control, self-determination and equality of opportunity and choices (Tarrant 2020). Needham asserts that at least in its early manifestation in policy, personalisation was

best understood as a string of interventions which sought to improve front-line practice, responding to the failings of other bureaucratic approaches (Needham 2011, p. 3).

However, it has also been associated with cost-cutting and efficiency, carrying a dual purpose of creating public savings while also producing better services and increasing value for money for the taxpayer (Leadbeater 2004 and 19, pp.17, Leadbeater *et al.* 2008). Commentators have further highlighted the congruence between the notion of personalisation and neoliberal ideals of shifting responsibility for public services onto the individual, privatisation and consumerism (Ferguson 2007, Needham 2011, p. 111). The notion that effective personalisation enables individuals to find the best way to solve their problems themselves is found throughout the initial writings of Charles Leadbeater. The cross-party appeal comes precisely from the ability to mobilise personalisation to further a variety of political strategies and complement multiple rationalities. It is against this background that personalisation becomes embedded within homelessness.

### Personalisation in homelessness duties

When someone experiences homelessness, or the threat of homelessness, they can approach a local authority for assistance in preventing or relieving that homelessness. Contained within Part VII of the Housing Act 1996 (hereafter HA 1996) is a framework of statutory duties owed to those individuals and their households, the conditions that have to be met for the duties to be owed, and how the duties can be discharged by the local authority.

Since 1996 local housing authorities have had a duty to provide, or secure the provision of, general advice and information on homelessness and the prevention of homelessness free of charge to any person who would like to access that information, regardless of whether they meet criteria to be owed any other duty under Part VII HA 1996 (s.179 HA 1996). If a person needs more than advice and assistance, they can apply for accommodation or assistance obtaining accommodation (s.183 HA 1996). The threshold for accepting that application is low – if the authority has reason to believe an applicant is homeless or threatened with homelessness (as defined by s.175-s.178 HA 1996) they have a duty under s.184 HA 1996 to make further inquiries as to the eligibility of the applicant and whether any further statutory duties are owed.

Before the Homelessness Reduction Act 2017 came into force, an applicant would be provided with accommodation by the local authority if they were deemed to be owed the main housing duty. This required an applicant to be homeless, eligible for assistance, in priority need, not to be deemed intentionally homeless, and usually to have a local connection to the local authority area (s.193 HA 1996, version in force 27 April 2015). A prevention duty was owed instead if the same criteria were met by an individual at risk of homelessness (s.195 HA 1996, version in force 9 November 2012). If an applicant presented and gave the authority a reason to believe they were homeless, eligible, in priority need and had a local connection there was a parallel duty to provide interim accommodation while it was being decided whether other statutory duties are owed (s.188 HA 1996, version in force 9 November 2012). These duties are extensive, but the applicant must leap a number of hurdles before they can benefit from such help.

The HRA 2017 modified the HA 1996 to include a swathe of new and expanded statutory duties interacting with the already existing framework described above. It was significantly informed by the recent shift in Wales to implement the Housing (Wales) Act 2014 which introduced stronger prevention and relief duties for all eligible applicants regardless of priority need. The reforms in the HRA 2017 are explored fully elsewhere (Arden 2018, Garvie 2018, Cowan 2019, Bevan 2021a, 2021b), but a key change was to introduce a new duty coming before the main housing duty, called the ‘relief duty’, requiring local authorities to take reasonable steps to help all applicants who are homeless and eligible to secure accommodation (s.5 HRA 2017, inserting s.189B HA 1996). It also expanded the prevention duty, requiring authorities to take steps to prevent an applicant’s homelessness if they are at risk of homelessness in the next twenty-eight days, and are eligible for assistance (s.1 and 4 HRA 2017, amending s.175(4) and s.195 HA 1996). Promoting inter-service cooperation, it puts a duty on certain public services who may come into contact with an individual at threat of homeless, such as prisons, social services, and Jobcentre Plus, to refer such people to a local authority (s.10 HRA 2017, inserting s.213B HA 1996).

This article, however, leaves these key changes largely to the side, and focuses on how the HRA 2017 purported to further the personalisation agenda within homelessness through its provisions. The undercurrent of personalisation was arguably already present within the provision of homelessness services before the HRA came along. A push in 2002 requiring local authorities in England to take a proactive approach in addressing homelessness by conducting homelessness reviews and crafting homelessness strategies for the prevention of homelessness in their district (ss.1–4 Homelessness Act 2002), led to an approach of service delivery which came to be known as ‘housing options’ (Pawson 2007). This approach was sold as creating more choice and fostering empowerment in citizens by presenting them with more ‘options’ for assistance than the statutory main housing duty which was predominantly discharged with social housing tenancies (Pawson 2007, p. 873). While this approach was credited with introducing effective prevention strategies, it was also feared as introducing ‘gatekeeping’ strategies, barring applicants from their legal entitlements to statutory duties (Pawson 2007, Fitzpatrick and Pawson 2016).

This ‘housing options’ approach has effectively become codified into the statutory framework with the intervention of the prevention and relief statutory duties. Going beyond this however, the HRA 2017 makes personalisation distinctly more explicit. Section 2 of the HRA 2017 expanded the already existing duty to provide general advice to require an authority to design this advice service to meet the particular needs of people within the local authority, in particular those leaving prison or hospital, care leavers, former members of the armed forces, victims of domestic abuse, people with a mental illness or impairment, and any other group identified by the authority as at risk of homelessness (s.2 HRA 2017, amending s.179 HA 1996).

Section 3 of the HRA 2017 introduced the idea of an ‘assessment and personalised plan’ through the insertion of s.189A into the HA 1996. Every homeless or threatened homeless and eligible applicant must now have their case assessed, including a written record of the circumstances causing the current situation, the housing needs of the applicant and their household, and any support needed by the applicant or people in their household to retain accommodation (s.3 HRA 2017, inserting s.189A(1)-(3) HA

1996). Section 189A(4) HA 1996 now instructs authorities to agree with an applicant any steps an applicant is required to take to be able to have and retain accommodation, and any steps the authority are to take. If the applicant and the authority cannot agree on required steps, the authority must record why they cannot agree and state any steps it considers reasonable for the applicant to take and any steps it is taking (s.189A(6) HA 1996). It is these recorded steps that make up an applicant's 'personalised plan'. An assessment and personalised plan must be kept under review to ensure it remains appropriate for an applicant's circumstances and up to date (s.189A(9) HA 1996). Personalised plans are more commonly referred to as 'personalised housing plans' or 'personal housing plans' (DLUHC 2024a, para. 11.2) – called a 'PHP' for short by local authority housing officers.

What it means for a plan to be 'personalised' is not expanded on in the relevant sections of the HRA 2017 or therefore the HA 1996 itself. It is, however, expressed within the Homelessness Code of Guidance that 'housing authorities should adopt a positive and collaborative approach toward applicants, taking account of their particular needs and making all reasonable efforts to engage their cooperation' (DLUHC 2024a, para. 11.2). The Homelessness Code of Guidance provides guidance to local authorities on how they should exercise their homelessness functions, and local authorities must have regard to it when performing such functions (s.214A HA 1996). It is also stated in the Code of Guidance that reasonable steps contained within the personal housing plans should be 'tailored to the household' (para. 11.18) and that efforts should be made to ensure 'genuine personalisation in response to the wide range of circumstances and needs experienced by applicants' (para. 11.19). Authorities are further encouraged to make every effort to obtain the applicant's agreement when formulating plans, where it is expected that 'Identifying and attempting to address personal wishes and preferences will help achieve that agreement, and improve the likelihood that the plan will be successful in preventing or relieving homelessness' (para. 11.29).

From these extractions it is suggestive that housing plans will be personal when they take account of an applicant's wishes and preferences, are tailored to the particular needs and circumstances of the household, and applicants are involved in their creation. The resulting inference is that through personal housing plans it is intended that a more individualised approach to homelessness services will improve effective prevention and/or relief of homelessness.

The establishment of personalisation into the homelessness application process through applicant assessments and personal housing plans was popular across proponents of the Act. As with the introduction of personalisation into health and social care services, it is hard to argue against a narrative of personalisation which promotes choice, involvement and empowerment (Ferguson 2007). As suggested above, it is clear that personal housing plans should be co-operative, reflecting an individual's needs and circumstances and drawing on their wishes and preferences. This is the personalisation narrative that charitable proponents of the HRA 2017 hoped could promote a culture shift within homelessness services. Shelter suggested it is this element of the HRA 2017 that sits at the heart of the new legislation, anticipating that a person-centred approach taking into account the preferences and desired outcomes of households has the potential to develop better working relationships leading to more satisfactory and sustainable outcomes (Garvie 2018, p. 8 and 17). It was hoped the Act would enable people to

have more autonomy over the help they want or need to keep their home (Garvie 2018, p. 19).

To explore how far this narrative of personalisation is borne out, it is necessary to investigate the operation of personal housing plans at the frontline. As suggested by Needham, the narrative of personalisation is made meaningful by those charged with implementing it (Needham 2011, p. 87). The question therefore becomes how personal are personal housing plans in practice?

## Data and methods

This article utilises data collected between October 2018 and September 2019 during the conduct of broader research exploring the implementation of the Homelessness Reduction Act 2017 for an ESRC funded PhD project (grant no: ES/P000711/1). The research involved the performance of ethnographic case studies within two local authority homelessness departments located in the Midlands, for a period of four months in each site. Given there were only two sites, the local authorities were sampled homogeneously. Both authorities are therefore Unitary in local government structure and at the time of data collection, both had a population density between 250,000–350,000 (ONS 2020). Each local authority had dedicated departments focussing on delivery of homelessness services. Access to the local authorities studied was obtained through negotiations with a ‘gatekeeper’ providing permission on behalf of the authority.

Ethnography is characterised by prolonged presence in a site of study, utilising several discrete methods of data collection to explore the lived human experience; the everyday behaviours, actions, beliefs and customs of a community (Angrosino 2007, Hammersley and Atkinson 2019). Multiple methods of data collection allow for triangulation and the substantiation of interpretations with multiple data sources drawing on different perspectives of the field of study (Flick 2007). An extended, integrated presence also enables a more relaxed, less artificial engagement with the research process.

While the practicalities of data collection differed slightly in each authority, observation was the main method of data collection used, with handwritten fieldnotes recording interactions. A number of different every-day activities were observed during the time spent in each authority, including: formal activities such as team meetings, training activities and interactions between housing officers and members of the public requesting assistance, which could be an initial interaction to determine the nature of the enquiry and whether there was a reason to believe the individual/household was homeless or threatened with homelessness and thus triggering a statutory application (s.183 Housing Act 1996), it could be an interview to conduct statutory inquiries to determine eligibility for assistance and what if any duties are owed under the statutory framework (s.184 Housing Act 1996), it could be an appointment to conduct an assessment of the applicant’s case or construct a personal housing plan (s.189A Housing Act 1996), it could be a follow-up/further enquiry from an already existing applicant. Meetings with members of the public would often combine elements of the above. Informal every-day office activities were also observed and recorded anonymously in fieldnotes.

A number of semi-structured interviews were conducted across the two sites of study, recorded via a Dictaphone and transcribed. In the first local authority (LA1) a total of 15 interviews were conducted including: one head of service, two senior managers, one in-

house consultant/manager, three team managers, three senior housing officers, and five housing officers. Within the second local authority (LA2) a total of 11 interviews were conducted including: one head of service, one senior manager, one team manager, one senior housing officer, four housing officers, one temporary accommodation officer, one administrative support officer, and one private sector landlord. Participants were selected initially based on gatekeeper recommendations, and further participants were then included after relationships were developed in the field. Interviewees were asked a variety of questions exploring the authority's responses to the HRA 2017, the performance of statutory homelessness duties at their authority, and their understandings and perceptions of their roles after the HRA 2017.

Finally, a small variety of documents were collected from the field, including blank application forms, information and advice documents given to applicants and any training/guidance documents staff deemed useful. It was also intended that samples of current applicant case files would be collected from each authority, with written and verbal informed consent obtained from applicants approached in the field to 'follow' their case by observing their interactions with the authority, and then to collect a copy of their case file on leaving the authority.

While this process was started in both authorities, at the time of collecting case files on leaving the first authority, they became cautious about data protection due to recent changes in regulation from the General Data Protection Regulation 2016 and the Data Protection Act 2018. They required a second instance of consent to release the files to be sought from the relevant applicants via a letter sent by the authority requesting a response if consent was given. No applicants responded, so no case files were released. The second authority however were comfortable with the initial consent forms, and information from six case files was collected.

Pseudonymisation is used to protect participant anonymity (at both local authority and individual participant level).

### How personal are personal housing plans?

This section will now move on to explore experiences of the implementation of personalisation on the ground in the local authorities studied.

Housing officers recognised and respected the importance of a personalised approach that attempts to take account of an applicant's wishes and preferences.

I do like to get to the point of the plan and ask them what they want to get out of it, what they want to get accommodation wise, I think that is an important question, and I have sat with people and they've not asked that question they have just gone and done the assessment and then said I suggest you do this and never asked that person what they want. But erm, I come from a support background and I think you should always ask that question even if it's something that you can't do for them and explain the reasons why that's not going to be appropriate, and looking at maybe doing that in the future with them. (LA1 – Housing Officer 4)

There is growing evidence that a person-centred approach and the availability of choice is particularly important for individuals experiencing homelessness who also have support needs (Mackie et al. 2017, pp. 91–96, 2019, p. 87). This is especially the case for rough sleepers who may not have had previous engagement with services, who show improved

outcomes for housing retention and wider support needs when they are given the opportunity to identify their own needs and shape their own support (Blackender and Prestidge 2014). Similarly, when personalisation is applied to the wider homeless population through personal housing plans, an expert advisory panel of Shelter service users confirm that it is important to them for their preferences to be at least a starting point in the discussion of reasonable steps, in particular preferences around location (Garvie 2017, pp. 19–21).

Housing officers further spoke of the practice of tailoring actions identified for the applicant to do in the personalised plans to the circumstances and needs of the applicant, particularly in the first local authority.

[...] we'd put that on their bits to do and then sort of make sure that they are aware of what their responsibilities are and they're aware of what we can do. And then sort of work it from there. But it does change. There are usual ones that you put in every time [...] but then you sort of tailor it to what their needs are. (LA1 – Housing Officer 5)

There is other things but sometimes it's a bit more specialised to that individual, you know with this job we get anybody in and you think I've never dealt with that before, you've seen 100s of people but it's like a totally new thing, a new circumstance that has never crossed your mind [...] so maybe something will crop up on that plan that we've never put on before and will never put on again. (LA1 – Housing Officer 4)

In both local authorities, the delivery of tailored services was further facilitated through the use of specialisms. In the first local authority, housing officers were divided into roles targeting either single homelessness, family homelessness and domestic violence, and homelessness from the private rented sector. The second local authority had predominantly a large group of generalist housing officers, but also had a specialist domestic violence housing officer trained as an Independent Domestic Violence Advisor, and a team of housing officers with a young person's specialism. Both authorities had dedicated rough sleeping teams. The specialisms were selected based on the need of the local area, and were intended to allow the use of specialist knowledge and experience to make the advice given, the delivery of the service, and the outcome, more tailored to specific circumstances.

The young person's team in the second local authority presents an example, where the approach taken to applicant interviews, assessment and the creation of personal housing plans tended to be entirely different to the standard for other applicants, with a focus on framing the housing context applicable to the individual and providing information about independent living. Information booklets given provided in depth information about Local Housing Allowance and shared accommodation rates, the costs of living, relevant bills that would need to be paid, and how to search for and find accommodation. This is in contrast to generalist interviews where this kind of knowledge would, for the most part, be presumed as most of those approaching have at some point had some kind of accommodation of their own before becoming homeless or threatened with homelessness. Housing Officers spoke of appointments taking a lot longer, and of the need to have often more than one initial appointment to allow the young person to get through and process the amount of information they needed.

Despite awareness and appreciation that tailored approaches to service delivery benefit service users, in practice personal housing plans were not personalised. The

three key reasons for this that emerged from the study were that authorities used techniques like preformatting the plans to reduce the administrative burden on housing officers; the economic conditions in the local housing market reduced the extent of the choice applicants could exercise, particularly with regard to whether they could access social housing; and the underlying power relations between the authority and the applicant precluded the applicant refusing a plan, even one which did not reflect their personal wishes, as the consequence of refusal to cooperate could be the authority legally withdrawing assistance.

### **Preformatting**

Experiences across both local authorities observed demonstrated that the information and depth contained within personal housing plans varied considerably across each authority and sometimes across housing officers. In the second authority, their personal housing plans contained arguably more information, but were heavily preformatted with considerable amounts of generic information.

There were several pre-formatted housing plan documents a housing officer could choose from depending on the circumstances or characteristics of the applicant, such as a family, or a single applicant, or a family with rent arrears, where the content within was intended to be more relevant to that particular circumstance. These preformatted plans had suggested steps for the applicant to take and the authority to take already included, and also contained information intended to assist the applicant in searching for a new home such as information on local housing allowance rates, a list of property advertisement websites, and a section suggesting that obtaining accommodation within the social sector would be unlikely. There was an additional space at the end of the plan to insert any additional steps for either party to take, where housing officers would insert two or three additional steps. A blank personal housing plan was available, with no preformatting or additional information. Yet housing officers more often preferred the preformatted plans for the details on local housing allowance and property advertisement websites, with only one housing officer observed utilising the blank plan.

The key problem with preformatted plans is that they are simply not personal. Despite attempts within the preformatted templates to tailor these plans to be more appropriate for the various circumstances with which an applicant might approach, it is not possible to individualise a plan before knowing more about each applicants' experiences. Often the suggested steps and the preformatted information were inappropriate.

I usually find I have to delete loads out because it isn't relevant to that customer. (LA2 – Housing Officer 2)

Preformatted information contained within every plan told every applicant they were unlikely to receive an offer of social housing. As will be explored below, this simply was not true in the second local authority where officers considered the majority of their cases were still discharged within the social sector, and certain household compositions, such as those requiring a 2-bedroom property, were more likely to receive an offer. While officers did find themselves regularly deleting some of the already suggested steps that were not appropriate in order to make the plans more relevant, the majority of the pre-

formatted content remained. Officers certainly did not have the time to delete or modify any of the preformatted information and advice.

The existence of preformatted plans is prompted by the desire to increase the efficiency of a housing officers use of time. There were linked concerns reported by housing officers in both authorities of feelings of an increased administrative burden after the coming into force of the HRA 2017. The construction of personal housing plans and reviewing such plans was seen as an element of that burden, alongside sending statutory notices and letters informing applicants of the processes and decisions taking place, and inputting data to satisfy national statutory data reporting requirements of the Ministry of Housing, Communities and Local Government (now Department of Levelling up, Housing and Communities).

I think the admin side of things was a big step up for people, I don't know what was done before but I know now we have a lot more paperwork to keep on top of, there are a lot of letters to be sent out all the time, on our systems there is a lot to update and all of the time [...] So you are just checking all the time, so I think that was difficult. (LA1 – Housing Officer 3)

This additional administrative burden reported was deemed to be detracting from other responsibilities of a higher priority, in particular active casework, which is more likely to result in successful prevention or relief than completion of 'paperwork'. One manager in the first local authority deemed their officers to be 'deskilling' as a result of having to spend more time on administrative tasks and becoming overly concerned with legal compliance of such administration (LA1 – Homelessness Manager 6). In an evaluation of the implementation of the HRA 2017 commissioned by the (then) Ministry of Housing Communities and Local Government, 43% of local authority respondents cited administrative burden associated with the new assessment and PHP requirements and the volume of written correspondence with applicants as a significant challenge in responding to the HRA 2017 (MHCLG 2020a, pp. 39–40).

This context of increased burden led to a lot of criticism regarding the utility of the personalised plans. They were largely perceived as a necessary statutory administrative task that formed part of an applicants case file and were never looked at again, or worked as a reminder tool for housing officers with large case loads as to what they needed to do on each one.

I don't really refer back to them, I think it has a lot of useful information in for the customer like it's got bits of the housing law and what happens next and erm, different websites to try for private renting, so I think that's useful for the customer, but in a way it feels like a tick box paper exercise. (LA2 – Housing Officer 2)

Usually it's just an actual tool for like us saying I've done that that and that but I've not done that yet I'll do that today. (LA1 – Housing Officer 4)

The second local authority's decision to utilise preformatted plans is not therefore an intentional thwarting of personalisation, but a response to increased burdens and a perception of plans as just part of a statutory tick box process, which has the unintended effect of dampening the tailoring of actions to the particular person.

## Choice and preferences

The ability to take account of an applicant's wishes and preferences is a key element in the personalisation of housing plans. This is recognised within the Code of Guidance as being an important aspect in encouraging an applicant's agreement and therefore making successful prevention and relief more likely (DLUHC 2024a, para. 11.29). It is further qualified, however, by the proviso that personal housing plans should be realistic, taking into account local housing markets (DLUHC 2024a, para. 11.20). The Code of Guidance provides an example, suggesting that where a plan is limited to a particular area in which the applicant would like to live, this is likely to be unreasonable where there is little prospect of finding affordable housing (para. 11.20). While this appears entirely sensible, reflecting the practicalities that restrict the capabilities of housing officers and the choices available, the current lack of affordable housing options within the housing market completely overwhelms any availability of choice in many cases.

In their report 'Building for our Future: A Vision for Social Housing' Shelter outline a country experiencing a Housing Crisis (2019). This crisis is principally for those who rent, broadly due to two factors: an insecure and expensive private rented sector and a chronic undersupply of social rented accommodation (Shelter 2019). These issues combine to both increase incidences of homelessness and make it much harder for local authorities to meet their statutory duties to prevent and relieve homelessness.

A Local Government Association survey conducted in 2018 found that some respondent local authorities perceived that 'increasingly hostile housing market conditions' combined with welfare reform and increased evictions from the private sector through the issuing of s.21's, was leading to an increase in overall homelessness (LGA 2019a). In the survey respondents were also asked which factors affected their council's ability to meet its clients' needs and factors most commonly selected as affecting ability to a moderate or great extent include welfare reform (92%), access to private rented sector housing (87%), affordability of private rented sector housing (86%), and access to social housing (77%) (LGA 2019b). These findings were broadly mirrored by the homelessness teams in the two local authorities observed.

I think . . . obviously you've got your private and social housing, that's about it, but in [local authority 1] there's a shortage of social housing so people don't understand that we don't have enough, private properties are more difficult and people are less willing to accept that so, there should be a third option but I don't know what that should be haha. (LA1 – Housing Officer 3)

If the tenancy can't be salvaged we'd really be looking intensively at something else for them in the private sector, but there is very little out there, that can't be overstated really. (LA1 – Senior Housing Officer 1)

This significantly restricts the availability of choice for applicants at the outset. While there is a blunt recognition from housing officers that this leaves very little options for many homeless applicants, they still need to find a way to discharge their duties.

Despite the important assertion from Shelter that social housing must still be seen as a vital solution in tackling homelessness (Garvie 2018, p. 22, Shelter 2019), the perception on the frontline is that there is simply no other choice but for applicants to look themselves privately or accept a private offer. There was a distinct interpretation of the

HRA 2017 in both authorities as authorising authorities, or forcing them, to look for the answer in the private sector.

[...] if you are going to open the door to non-priority homeless for the local authority to prevent homelessness as a stat role, you are going to have to look outside your social housing stock because you simply are not going to be able to respond (LA1 – Head of Service).

[...] the idea of the Homelessness Reduction Act to me is, there's a bigger wider world out there, we are never going to get private sector housing to a better level if we don't start using it and working with it, so it should be feeding in, it should be private sector and only if well that's not possible, full duty or not, it's down there that they get social. (LA1 – Homelessness Manager 6).

In interviews with staff and general conversations, this went hand-in-hand with a strong emergent theme that the introduction of the HRA 2017 linked with a need to change applicant expectations, or 'managing expectations', around what could be available for them, disciplining applicants to only ask for what can be given rather than what they might want.

But also it is about changing or educating people's perception, it is about us being true, and this is what I love about the personal housing plan, it is about saying to customers, what used to be available now, the demand is more than the supply, erm and we've changed some mind sets, erm and we are working on the others [...] we can sit our customers down and we can go through the personal housing plan with them, and realistically say this is what is available. (LA2 – Housing Officer 1)

This quote demonstrates an approach that is distinctly anti-choice, limiting applicants to what the housing officer perceives is available. There is the perception of a need for a culture change around the role of social housing and the expectation that social housing is the major provider in addressing housing need. Where applicants attempt to express their preferences for the affordability and security of the social sector and show reluctance to search in the private sector, this could be seen as the individual being responsible for limiting their own options.

[...] and people, even now you know you say we can close your application with a private rented or a social housing offer and you can see them going, I don't want it. And we'll go well if we find you one, I've been saying it, we aren't going to, but if we find you one and it's deemed to be suitable and affordable and you know, erm then that would be your offer. And even then you're going I know they are not going to look for themselves private because they don't want it so they'll sit and wait. And I don't know how, at the moment I don't have the time to start looking for them. (LA1 – Housing Officer 3)

[...] the universal challenge, with this whole legislation is the customer. Because the expectation of I'm homeless, my route is into temp accommodation which might be bed and breakfast it might be a temp tenancy, all of which I hate, but at the end of it, my route is into a 100 year long tenancy with a local authority or registered provider [...] and trying to, both the customers and staff, er, enlist a new culture that says actually this is about accommodation capable of being available for up to six months [...] so the whole ethos of the legislation is not about social housing as a response, it is about something else. That's very difficult to transition our customers and our staff into that mindset. (LA1 – Head of Service)

As the quote above from Housing Officer 3 demonstrates, where an officer suggests the step of searching for privately rented accommodation and the applicant expresses reluctance, the step was included anyway, it often explained to the applicant that they were expected to look privately and that the authority could discharge their duties if they so wished with an offer of a private rented property they deemed suitable, sometimes with a warning the case could be closed if the applicant refused that offer (as per s.189B (7)(c) and s.195(8)(d) HA 1996). The Head of Service also demonstrated that there is not only a struggle to transition applicants into expecting something different, there is a need to transition housing officers too.

In the second local authority the problem was more conceptual than practical. While the private sector in the local authority area remained largely unaffordable and inaccessible, they believed they had a relatively good supply of social housing to meet general demand in comparison to other authorities. Despite this, housing officers were still instructed at implementation of the Act not to utilise the social sector in the discharge of early prevention and relief duties. All applicants were to first search for accommodation in the private sector regardless of their individual circumstances, often being required to produce some evidence or logs of searches and their outcomes before housing officers would consider nominating applicants to social housing providers. There was a space preformatted into personal plans to record this log.

[...] when the new Act came in the nominations [to social housing providers] fell [...] because of] the private push and we were told not to nominate, because of the new Act and that we shouldn't be nominating for at least 56 days. (LA2 – Housing Officer 2)

There were some inconsistencies in practice, with some housing officers still nominating for social properties where they saw the chances of being able to find affordable privately rented accommodation were low but the household were quite likely to be offered a social property within a reasonable time. In one instance where this was observed, the housing officer still felt they had to list searching for privately rented properties as a step for the applicant on the personal housing plan despite not having any intention to require or enforce it. In other cases, this practice might mean very little happens during the period of a prevention or relief duty, where an applicant does not or cannot find a suitable private rented property, and is not nominated for consideration for available social housing properties by the housing officer.

### ***Agreement and co-construction***

It is envisioned within s.189A(4) HA 1996 that the personal housing plan is to be formulated in agreement with the applicant, contributing to the personalisation narrative surrounding personal housing plans by enabling applicants to play a more active role in their service provision. An element of co-production in shaping the service users receive is a key aspect of Leadbeater's personalisation by participation, meaning individuals become more active and responsible (Leadbeater 2004, p. 59). However, as highlighted by Andrew Arden, reflecting on the new provisions of the HRA 2017, agreement presupposes equality between the parties (Arden 2018). Commentary on the similar homeless duties in Wales reflects the optimism that this intended co-construction of

plans has, in itself, potential to address the power imbalances that exist between housing officers and individuals experiencing homelessness (Rogers *et al.* 2020, p. 115).

However, further provisions put an end to such hopes only two subsections later. Ultimately, under s.189A(6) HA 1996, if it is not possible to reach agreement with an applicant, an authority simply records why this was not possible, and includes the steps it considers reasonable for the applicant and the authority to take. It therefore appears that the cooperation envisioned by s.189A(4) HA 1996 is largely illusory, and a power imbalance remains. There is little incentive for authorities to secure an applicant's agreement.

So at the end of the plan we would obviously go through that with them, that has to be something they agree to do and obviously we put that they agree to it or not, if they don't agree to it it's very hard to help them, so it's kind of a catch 22, we explain if they are not going to do these things on the plan we will not be able to help you with your homelessness so the majority of them do agree thank god. (LA1 – Housing Officer 4)

This power imbalance is further sustained by the ability to bring the prevention and relief duties to an end where an applicant is deemed to be deliberately and unreasonably refusing to cooperate with the steps listed on the personal housing plan (s.193B and s.193C HA 1996). In the first local authority this possibility was often used as a very conscious method of disciplining applicants, as a tool to encourage engagement, particularly with single homeless applicants. In almost every appointment after having gone through the personal housing plan with the applicant, the applicant was reminded that if they failed to take any of the steps listed in the plan the authority could potentially end their duties. Common steps entered onto personal housing plans reflected this desire to try encourage responsible behaviour, focussing on engagement and rule following through requiring attendance at any appointments made, to keep in touch with housing officers, to follow the rules applicable to any placements such as in bed and breakfast hotels or hostels, to pay service charges, and to engage with any support or social workers.

I've sent warning letters, but erm I've never ended the duty, I've just tried to use it as a bit of a tool to get them to actually help themselves, usually, more than that, we'd close it because we've lost contact or not engaging, we just can't get a hold of them, rather/because that would be the case why, it wouldn't be that they are not doing the things on the plan because it might be they are chaotic and they actually couldn't do that anyway so it would be unfair to close it in that respect, and that's just a guideline to keep prompting. (LA1 – Housing Officer 4)

The ability to end duties in this manner cannot however be taken lightly. Where it appears that an individual is not cooperating with the personalised housing plan the authority must arrange a review of the plan and assess whether the applicant's circumstances or needs have changed and whether the steps remain appropriate to require (DLUHC 2024a, paras. 11.33 and 14.50). When considering whether a failure to cooperate is deliberate and unreasonable the authority should consider the particular circumstances and needs of the applicant, any difficulties the applicant has in managing communication, and must also ensure the applicant understands what is required of them and is not refusing to cooperate as a result of mental illness or other health need for which they are not being provided with support (s.193B(6) HA 1996; DLUHC (2024a),

paras. 14.52 and 14.53). The ending of the prevention or relief duty in this way also carries a strict process, where first a warning letter must be issued to the applicant informing of the intention to issue a notice that would bring an end to the duty, which must explain the consequences of such notice and give a reasonable time to allow the rectification of the non-cooperation (s.193B(4) and (5) HA 1996). In order to then issue a notice under s.193B(2) HA 1996, the decision to issue such a notice has to have been made by a local housing authority housing officer and authorised by an appropriate person who is at least as senior as the decision making officer, and was not involved in the initial decision to give notice (The Homelessness (Review Procedure etc.) Regulations 2018 SI 2018/223, reg.3). The applicant may also request a review of the decision to issue a notice (s.202(1) HA 1996).

In the authorities observed, while some officers could potentially see the benefit of this method of ending duties, the majority of officers found difficulty with ending the duty in this way as they struggled to envision applicants who were deliberately uncooperative, suggesting they would be very unlikely to use this method of ending a duty. While as discussed above, officers have utilised the threat of ending the duty in this way as an attempt to encourage engagement, they do not envision following through on that threat.

I think it's a bit woolly, and I think a lot of the time that will apply mostly to single people, you are always going to get people that don't cooperate and sometimes they can't, it's not because they are just being difficult, obviously you are going to get people that are just difficult but at the same time you close it on the basis that they won't cooperate they will be back three months later in exactly the same situation so it is almost a revolving door what's the point [...] it doesn't feel like you are doing them any kind of service because you are not getting anywhere. [...] So no I've never used it and I can't see me using it. (LA1 – Housing Officer 1)

Other officers and staff considered that ending the duty in this way would be too open to legal challenge, and expressed a lot of uncertainty about being able to make the case for a deliberate and unreasonable refusal.

I don't think we've used it at all, and going through the code of guidance and picking up the vibe that it is not intended to be used a lot and that it is very challengeable, so I'm not saying that we won't use it, but you really have got to look very carefully at the history of the client [...] I think it's quite obvious from the code of guidance that it is not meant to be used as a sort of an easy way out, and I don't think that/we certainly won't be using it like that. (LA1 – Senior Housing Officer 1)

[...] the obvious one is around non-compliance, can you legitimately say someone is not complying and can you, can you, win if it goes to a challenge, a legal challenge. What's the burden of evidence that you need to show that and demonstrate that is the case. (LA2 – Head of Service)

Despite reluctance within both authorities studied to utilise refusal to cooperate as a method of ending the prevention and relief duties, national statistics demonstrate that out of 34,770 prevention duties that ended between September-December 2019, only 90 were closed due to applicants refusal to cooperate (MHCLG 2020b). Out of 39,670 relief duties coming to an end, 110 did so due to refusal to cooperate (MHCLG 2020b). This trend of reluctance to utilise these provisions has continued through to the time of writing (DLUHC 2024a, DLUHC 2024b).

## Analysis

While the introduction of assessments and personal housing plans was intended to put the individual at the centre of the application process and the discharge of duties, even with the best of intentions the ability to recognise and meet identified needs and personal preferences is ultimately driven by the availability of options in the local area to meet those needs. The focus in appointments and through these plans is on the individual to perform their listed actions, whether or not duties would actually be brought to an end if steps were not taken. The ability to put down steps regardless of an applicant's agreement and to discharge duties for non-cooperation both demonstrates and reinforces power differentials between applicants and officers, weakening perceived notions of choice or control in the applicant. As soon as housing plans lose considerable elements of meaningful personalisation, they also lose considerable utility as a useful tool in effecting successful prevention and relief, becoming more of a necessary administrative task to complete. This then invites concerns around the efficient use of time, leading to practices like the use of preformatted documents, reducing the opportunity for personalisation and to tailor a plan to the circumstances and needs of a household at the outset.

Concerns relating to the level of personalisation achieved by local authorities when making plans was reflected in the Crisis review of the implementation of the HRA 2017. Plans were criticised for not accurately reflecting the personal circumstances of the applicant, and for being more of an information leaflet than personalised plan (Rich and Garvie 2020, pp. 18–19). The report criticised plans for containing generic statements explaining that applicants were unlikely to receive an offer of social housing and that due to little suitable accommodation being available in the area, advice on personal housing plans ultimately amounts to 'find your own accommodation' (Rich and Garvie 2020, p. 19). This is, unfortunately, entirely consistent with the data reported above.

Given this, it is important to reflect on what exactly it is that the personalisation agenda promoted through the HRA 2017 has to offer.

There are two conflicting narratives emerging that cannot be reconciled. One, is a narrative of what might be termed 'social justice', and the other is a narrative of 'marketisation', or indeed 'neoliberalism' (Mladenov *et al.* 2015). The language of the Homelessness Code of Guidance reflected above, and the hopes expressed in the reform process that the HRA 2017 will result in a culture change for service delivery, promoting choice and autonomy, and therefore leading to tailored and more successful outcomes, reflects personalisation as social justice. However, through an exploration of practice and closer reading of statutory provisions, it is clear that a counter narrative is prevailing, one that promotes marketisation and the individualisation of responsibility.

Neoliberal rationality is characterised by a minimalist state, premised on the extension of unfettered market relationships, and the individualisation of social risk (Dean 2014, Lerner 2016, p. 5). Neoliberal policy agendas are targeted towards privatisation and deregulation, with the intent of leaving individuals free to exercise choice and expression, but burdened by responsibility for their own actions and wellbeing (Harvey 2007, Connell 2010, Peck 2010).

The implementation of the above personalisation agenda is distinctly pushing individuals and households towards the private rented sector to meet their needs and away from social housing. Even in an authority which deemed themselves to still have

a reasonably good social housing supply, officers were still instructed that the HRA 2017 is about individuals being supported to look themselves within the private rented sector before potentially being able to access the social sector. This is because of the ability to end the prevention and relief duties if the applicant has secured a six-month assured shorthold tenancy (s.189B(7)(a) HA 1996), and of the expectation through the personalised plans that the applicant is to take steps themselves as well as the authority. This marketisation is so strong that the expectation is preformatted into plans in the second authority and included as a standard action in both authorities despite officers knowing and understanding the difficulties applicants experience in the private rented sector in securing affordable and stable accommodation.

Despite a reluctance to actually use the deliberate and unreasonable refusal to cooperate to end statutory duties, authorities were happy to use it to suggest to applicants they are responsible for performing their side of the plan and to behave in the ways suggested by the authority. In some applications observed, the steps for the applicant would outnumber the local authority steps. Personal Housing Plans are being used to send a message to the individual that they are expected to play a role in resolving their own situation.

I think there is [a lot of responsibility on the individual] and I think that is good because I think erm, you know we are there for advice and guidance but this is ultimately their responsibility as it is their housing situation which I can help them and guide them all they want but I can't do it for them. Yeah". (LA1 -Housing Officer 3)

There are direct and numerous warnings of the potential for this to happen from reflections of the introduction of personalisation in adult social care and the context of personal budgets (Ferguson 2007, Mladenov *et al.* 2015, Pearson 2000, Spandler 2004 to name only a few). Leadbeater's early reform agenda is infused with neoliberal ideology (Ferguson 2007). As referenced above, the language of personalisation has an ability to promote multiple rationalities, and this article contributes to the discussion on personalisation by adding homelessness statutory services to the list of policy areas where the social justice narrative has failed to triumph. Personalisation is being used as an instrument for welfare state retrenchment (Mladenov *et al.* 2015), as a 'Trojan horse for the introduction of even greater privatization and penetration of market forces into the welfare state' (Ferguson 2007, p. 398).

Taking this a step further, neoliberalism can also be seen as a rationality of government, based on Michael Foucault's concept of governmentality (Foucault 1991a). Here, the idea of government is seen in a much broader sense as being any attempt to affect the behaviour of individuals and society as a whole. Within this understanding, neoliberalism becomes a rationality which directs the conduct of the behaviour of individuals, and the way individuals conduct themselves. Under Foucault's concept of governmentality it is possible to explore how particular rationalities are embedded in practice, how a particular way of doing things is reasoned and justified (Foucault 1991b, pp.77 and 79). While neoliberal rationality is premised on a minimalist state, that does not necessarily mean an absence of government, but instead a mixture of direct intervention by means of empowered and specialised state apparatuses, and also indirect techniques for leading and controlling individuals, without at the same time being responsible for them (Lemke 2001, p. 201).

Under this analysis, the HRA 2017, and in particular the practice of personalisation, is an apparatus for implementing the neoliberal rationality among local authority homelessness departments and individuals experiencing homelessness. As already aptly identified by Dave Cowan, personal housing plans embed a re-imagining of the welfare recipient as an active citizen-consumer, promoting ideals expressed by Bob Blackman, the MP responsible for tabling the Homelessness Reduction Bill, that the HRA 2017 also ensures ‘everyone takes an aspect of personal responsibility, so that people will be rewarded with good outcomes for co-operation and engagement with the process’ (Cowan 2019, pp. 122–123; HC Deb 2016b, col 544). The data presented above provides additional support for such an analysis of the Act.

The personal housing plans, together with the ability to end statutory duties for non-cooperation, work together to create an impressive tool of both top-down government and of self-government. Local authorities are broadly implementing the neoliberal rationality whether they wish to or not, through lack of resources for any alternative, through fear of legislative non-compliance or due to buy-in of the rationality. Applicants are ‘managed’ into taking responsibility for resolving their situation, primarily through participation in the private rental market, and the inbuilt power imbalances ensure an applicant ‘agrees’ to such management or risk being excluded from the statutory framework altogether. The ability to end statutory duties for non-cooperation does not need to be widely utilised to exercise governance.

Bevan refers to this as constructing the homeless population as a ‘risk’ population, with the provisions of the HRA 2017 requiring applicants to ‘de-risk’ themselves in order to successfully participate in the housing market (2021a). An applicant is promised the removal of the stigma and effects of homelessness if they agree to improve themselves through self-work (Bevan 2021a, p. 270).

Proponents of the HRA 2017 hoped the act would result in a culture shift towards removing barriers and inclusion, which Bevan further refers to as a positive ‘risk-embracing’ approach (Bevan 2021b). While the HRA is certainly more inclusionary in the scope of its duties, it works to bring even more individuals into the control of its neoliberal rationality, falling under the ‘tutelary gaze of the welfare state’ (Cowan 2019, p. 122), all while managing to avoid the acceptance of the responsibility for actually reducing homelessness. Personalisation ends up the wolf in sheep’s clothing, neoliberalism disguised in social justice.

## Conclusion

This article has utilised data from frontline delivery of the HRA 2017 to establish that the introduction of personalisation into homelessness services has not yet managed to establish the culture change envisioned in promoting a more ‘meaningful’ service. Instead, this article adds to the growing body of literature exposing the HRA 2017 as a tool of neoliberal governance (Cowan 2019, Bevan 2021a, 2021b). As long as personalisation is implemented through a neoliberal rationality, alongside neoliberal housing policy, the notion of choice and autonomy in structuring a tailored personal housing plan will remain largely notional. This does not mean that the provisions of the HRA 2017 can never affect social justice, personalisation does not have to be inherently or necessarily

neoliberal. But in the current era of entrenched neoliberal rationality, this vision remains an idealism.

If personalisation within the social justice narrative has the potential for more satisfactory and sustainable outcomes in preventing and relieving homelessness, as set out above (Garvie 2018, p. 8 and 17), then the inability for this narrative to manifest suggests the goal of the HRA 2017 in ‘reducing homelessness’ is being hampered.

This is disappointing but not entirely surprising. The HRA 2017 emerged following a period of significant welfare regression within the UK, characterised by reductions and limitations on the receipt of social security, and increased conditionality and individual responsibility (Prideaux 2009, Wiggan 2012, DWP 2014, Daguerre and Etherington 2014). Since the late 20<sup>th</sup> century housing and homelessness policy has been subjected to an increasingly neoliberal influence (Glynn 2009, Cloke *et al.* 2010, Slater 2012, Murie 2015, Bevan 2021a). On its face, the HRA 2017 appears to run counter to these trends, accepting new state duties in preventing and relieving homelessness and enshrining personalised and tailored services. However, on exploring its implementation in practice, we find that it fits right in.

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