

## Summary of Responses to the Supporting People Guidance

### **Guidance**

**Hanover/EROSH** - Disappointed that the references to sheltered housing in the 2003 statutory guidance are omitted in the draft guidance. Would really like to see the following elements of the 2003 guidance reinstated in the 2007 version. **Promoting choice** - The need to promote choice in sheltered housing is greater now than in 2003. Choice is also important in terms of choosing between providers. **Eligibility criteria** - Some AAs now want to introduce eligibility criteria that entail an older person having a strong local connection. Many older people choose (or need) to move closer to friends, relatives and specific services in their retirement and this informal support network is hugely important in the wider preventative agenda.

**Kent** - Content with the substance of this document and cannot dispute the requirements for non excellent authorities, which we intend to follow.

**Nottingham** – The guidance offers a very useful guide to LAs and partners in relation to the SP Programme. Definition of eligible services are helpful particularly the inclusion of activities that are not eligible for funding. Definition of eligible handy person services also helpful but suggested maximum time of 16hrs per task goes beyond what a handy person may reasonably be expected to do – suggest a maximum of 8hrs per week would be more in line with the sorts of activities to be carried out for each task or service user.

**Redcar & Cleveland** – Recognised that many of the changes were identified within the grant conditions or directions and bringing it all together in a revised guidance was helpful. Commissioning Body did recognise the importance in establishing a statutory framework for some of the actions arising out of the national strategy. Most of these actions were relatively minor and well trailed but it was concluded that a review in 2007/2008 may be more significant. The CB would request that changes are signalled at the earliest opportunity.

**Rotherham** – Commissioners felt that the guidance seems suitable in regard to the service review

process and transitional arrangements.

**Devon** – Welcomes the additional clarity that updated guidance for the programme brings, particularly with regard to the issues of service review, transitional arrangements, individual budgets and outcomes.

**Essex** – Guidance provides working detail to the national strategy and will help implement their strategic programme over the coming three years.

**Leicestershire** – Welcomes draft guidance, particularly the detailed clarifications on the eligibility of services for funding and the definition of housing related support.

**East Sussex** – Guidance clarifies some of the areas not covered in the grant conditions. Not clear of the status though - whether it is mandatory or a guidance. Seems contradictory to call it statutory guidance.

**Enfield** - Guidance clarifies many areas regarding eligibility that will enable SP to negotiate more confidently where ineligible tasks are currently being funded.

**North Somerset**:- Updated guidance is seen as a positive step forward.

**Havering** – Guidance is fairly straight forward but paragraphs 18, 38 and 39 when taken together possibly need some further clarification.

**Cambridgeshire** – Guidance provides clarity in a number of key areas including eligible welfare services, handypersons services and extra detail around defining housing related support.

**Orbit Group** – aware that document was aimed at AAs but felt it contains some significant information that might impact on providers of housing related support services.

**SP East Region Group** – welcome clear continuation of the themes in the draft guidance and appreciate the continuity in policy – welcomes the clear statement on the use of SP funding and detailed definition of

housing related support.

**Cornwall** – Guidance brings clarity to the guidelines and conditions to the SP programme.

**Chartered Institute of Housing** – repeats and reflects many elements in the preceding guidance documents; this reinforcement of the purpose and scope of the SP programme is helpful.

**Sheffield** – Unusual to issue draft guidance in mid year to relate to a current year programme. This means that by the time it comes into effect at 9 months of the year will have passed so its impact will be very limited. Letter states that further changes are planned for 2007/08, would be preferable to simply consult and issue new guidance for 07/08 in good time.

**Norfolk** – First time the statutory guidance has been amended since 2003 although grant conditions have been changed annually.

**Lincolnshire** – Examined draft guidance and are generally in support of it, not seeing any aspects which would cause difficulty.

**CLG's response** – Supporting People programme focuses on the individual's need to remain in and to maintain independent living in their home or community. The tenure neutrality of the programme allows different housing related support, which may often be floating support, to be provided to an individual regardless of where they live.

There appears to have been some confusion arising from the use, in the Guidance document, of the term 'statutory guidance'. Under s93(8) of the Local Government Act 2000 there is a statutory duty on authorities to have regard to any guidance which relates to the administration and application of the Supporting People Grant Programme. For ease of reference, this guidance is shown in text boxes contained in the guidance document. So as to clarify the position and to avoid future confusion, paragraph 2 of the Guidance document has been amended and references to 'statutory guidance' have been removed.

The publication of the new guidance has been aligned with that of the grant determinations, where the changes in the grant conditions have been reflected. This decision means that there will be no need to further make changes to the guidance in 2007/08 as previously communicated to stakeholders.

In terms of the handyperson hours, CLG consulted on this point last year during the 2006/07 grant conditions consultation and the general consensus then was that the 16hrs limit was reasonable, and therefore will be retained.

The charging rules should be applied to all services users, including leaseholders where a local Supporting People leaseholder policy sets out whether an authority will pay support to leaseholders.

## Local Connections

**Kent** - Will make every effort to ensure that requirements relating to Local Connections not breached but it might be of material assistance if CLG could remind Districts and Boroughs by letter of their respective responsibilities.

**CLG's response** - We will consider how this can be taken forward.

**Kent** - Request that there is a stipulation that AAs are reliant on housing providers (as landlords), Health and adult Services to undertake their statutory responsibilities to those who are eligible to live in, or receive their services for example the requirement to enable a user to manage their own medication – the provider is obviously reliant on appropriate intervention by the prescribing authority

**Nottingham** – Headings for proposed outcomes framework are positive although some of the proposed indicators may be difficult to evidence. Look forward to more information from CLG on this in due course.

**Redcar & Cleveland** – The section on the proposed outcome framework promotes the most debate because whilst the move to such a framework was viewed as being positive there was some surprise that the Every Child Matters was chosen rather than the emerging framework for adult social care – given the greater emphasis on adults within the programme & the integration on services around the three grouping

promoted through the national strategy – it was felt that adult social care framework would prove to be a better fit.

**Rotherham** – Outcomes measurement can be used as a tool to assess the progress and satisfaction of individual service users in services, (measure the added value of services) and help identify the benefit realised by services and the Supporting People programme more generally (measure benefit realisation). Outcome measurement by CLG should emphasise benefits realised by services and the cost benefit of the programme, not added value or user satisfaction, which should be led by providers. The guidance does not clearly identify the role of CLG in relation to outcomes measurement, however commissioners agree that the proposal to measure outcomes in the same manner as for "Every Child Matters" seems very sensible and agree that outcome measurement does not mean re-visiting eligibility criteria.

**Nottinghamshire** – No reference in this guidance to the BVPIs and PAF indicators referenced in the (non excellent) Grant Conditions. Whilst it is acknowledged that the White Paper signals an approach to a more outcome based approach, it would provide the programme with the opportunity to feed into a well established set of performance data and the slow progression of work to link the programme to these PIs is disappointing. It is recognised that a national outcomes framework for the programme is needed. Regarding the outcomes model currently being developed by CLG, there are local concerns from the Commissioning Body in relation to content and from providers in relation to administrative burden and fitness of the framework in relation to long term services. It is therefore requested that wide and detailed consultation is undertaken before a national approach is defined

**Essex** – Welcomes the emphasis on outcome-based working which is central to their approach on future contract management, starting with VIP related contracts. The East of England Region (SPERG) responded with an element of concern on outcomes and wish to also emphasise this. A national outcomes framework needs to focus on those elements that will affect future spending reviews and should not impede on Regions/AAs in their development of outcome monitoring frameworks that also contribute to providers' own working practices and SP's contract management.

**Leicestershire** - Surprised that there are no clearer links between the outcomes section and the white paper "Our Health, Our Care, Our Say". Appreciates that there are some overlaps between the seven outcomes in the white paper and the five in "Every Child Matters". However the Council's performance in adult social care and health is going to be measured in the future on the seven outcomes in Our Health, Our Care, Our Say", and would suggest that it would be more appropriate to align SP to these. This would further assist more integration of SP across other related services and provide a more coordinated approach to measurement of its outcomes. The two additional measures of leadership and commissioning and use of resources could also be applied to SP.

**Peterborough** – Welcomes the focus on outcomes as a way to demonstrate the benefits of the SP programme. Whilst giving this support, there were concerns about the level at which outcome were to be measured, individual or service level and the flexibility of AAs and service providers to introduce them at a local level to support programme development. As the Peterborough programme is pursuing joint commissioning with Adult Social Care, the application of a high number of outcomes covering both SP and social care would make contract monitoring very bureaucratic.

**Brent** – Welcomes the move towards making the SP programme outcome focused. Notes the proposal to use the five level outcomes stated in *Every Child Matters*. Whilst they see the links of these outcomes with SP activity, and aims in these high level outcomes do not cover all aspects of the programme. Would like Diversity Outcomes to be specifically stated. Over 50% of population is BME with over 75% of SP clients being from BME groups. Would prefer a specific outcome for any funding programme that promotes equality and freedom from discrimination. Whilst Brent can see the attraction in applying an established outcomes framework to the SP programme, they do not agree that applying outcomes taken from a framework for children to the SP programme, which is mainly directed at Adults is appropriate. The 7 outcomes stated in the white paper "Our health, Our care, Our say" could be argued to be equally, or more applicable to the SP programme. The inclusion of an outcome relating to both discrimination and to dignity apply equally well to the SP programme. There is an argument for developing a specific outcomes framework for the programme rather than shoe-horning the programme into an outcomes framework taken from any one or other national programme.

More work required on the performance indicators proposed and they need to be made more applicable to the expected outcomes of the SP programme for example all the PIs proposed relating to Economic Well Being relate to benefits claims, whereas the aim of many SP services is to help people back to work and not to claim benefits. Outcome indicators appear to be measuring output rather than outcome measures. Timetable proposed for introduction of an outcome based indicator by April 07 is very ambitious. Suggest the phasing in of additional PIs on a timescale to be agreed with full consultation with providers. Brent have three provider theme groups working on issues relating to older people, vulnerable adults and single homeless people. These groups are currently working on definitions of common outcomes for their services and would agree PIs that could be collected to evidence achievement of the outcomes. Groups could participate in piloting CLG's proposals or act as sounding board for future proposals.

**East Sussex** – Would like an explanation on the draft "potential indicators" or identified areas of need that could be used to help to demonstrate and measure the positive effect of SP. They seem to be aims and tasks rather than indicators or areas of need.

**Enfield** – Supports the proposed outcome monitoring framework and the five high level outcomes that have been adopted. Interested in the way CLG suggest LAs should collect the outcomes from providers – will this be via a spreadsheet similar to the quarterly PI workbooks? Concerned those outcomes calculations submitted quarterly by providers need to be checked against the individual's support plans. There also needs to be verification regarding whether the individual service user believes they have achieved a particular outcome or whether the provider believes the individual has achieved the outcome. Will incorporate this verification into their Contract Monitoring framework and be asking providers to bring a selection of support plans to contract monitoring meetings, which will be cross referenced against their outcome monitoring returns to ensure that the figures link back to individuals' support plans.

**North Somerset** – Great news about outcomes, but CLG would need to back the automation of PI collection through the SPLS for consistency and would need further investment.

**Cambridgeshire** – The draft Outcomes framework causes a degree of concern. Whilst the principle of an outcomes framework is worthy of consideration and there is some logic in a national approach,

Cambridgeshire do have some reservations about the approach CLG is currently promoting. Their main concerns are around: **Timing** - intention to implement the framework in April 07 fails to consider the IT implications and capacity of providers and authorities to deliver to this timescale. **Complexity** - Authorities have struggled to get providers to complete the current KPIs yet CLG is proposing a much more complex and scattergun approach in favour of a few important PIs. **Bureaucracy** - The proposed framework is asking for evidence of tiny bits of information at the user level. The task of collecting this information has been underestimated. CLG appears to be focussing on contract monitoring rather than pure outcomes. **Not focussing on what really matters locally**: CLG has not yet specified how flexible they will be around adopting these measurements. If it is decided that it is mandatory, there is a danger that more relevant PIs linked to LAs for example would not get the level of focus they deserve. There is a danger that real changes in people's lives such as preventing homelessness or return to prison may be overlooked.

**Foundations** – In a previous CLG SP strategy consultation, Foundations outlined a number of HIA sector's concerns in relation to the progress and development of the SP programme. Many of these concerns remain and some have grown. Suggests that any outcomes framework should focus on simple preferably measurable outcomes. Currently contributing to CLG's work in this area on behalf of HIAs but in relation to the draft outcomes framework in schedule 2 would recommend that further advice is sought from Foundations. There are very few references to the elements of SP work that HIAs contribute to within the framework and therefore concerned about how this is interpreted locally. Useful amendments that could be made to alleviate problem includes **Economic Wellbeing** – HIAs can contribute to maximising income through benefit maximisation, applying charitable institutions on behalf of clients, providing advice on reliable sources of equity home release, and home loan repayments amongst other things. **Being Healthy** – fabric and design of the home can be made safer and improved to have a positive effect on the health of the person(s) living in it, **Safety & Security** – HIAs carry out practical safety measures such as fitting window and door locks, door-chains and spy holes. In relation to section 46 of the guidance, Foundations would be pleased to work with the CLG to liaise with HIAs who are interested in working in this kind of initiative.

**Orbit Group** – Welcomes an outcomes measurement framework been adopted nationally, but how will

providers and stakeholders be involved and consulted about the development of this framework? Many providers have spent a great deal of time and money developing outcomes framework to reflect local requirements. There may be some opposition to having to review these methods but if it were a national mandatory requirement, it would reduce some of the bureaucracy for providers working across several AA areas. Encouraging for providers to move away from a process led system to outcome focussed and a more positive way forward for the provision of support services.

**SP East Region Group** - concerned that the framework is being implemented without any consensus having been reached between providers and SP on the type (service user or service level) and quantity of outcomes to be collected. Has CLG considered all the IT implications? – task of collecting information will not only be time consuming for the provider but also there is a question mark over the relevance and usefulness of collecting the proposed outcomes for all client groups at this level of detail. Outcomes need to be linked to LAAs. Is the intention to implement the framework in April 07 realistic?

**Rochdale** – Welcomes the development of the Outcomes approach within Supporting People and feels that using the same high level outcomes as those within the Every Child Matters is really positive. The outcomes are understood and established within related services and are easily transferable. This joined-up approach will also assist when a child transfers to adult services. The outcomes tool developed by the authority will map directly to the CLG high level outcomes and draft indicators, but request that a national outcomes framework will allow for local variations in outcomes to meet local needs.

**Refuge** – Delighted to see a draft framework for national level outcomes contained within the SP guidance however it is inappropriate to establish common outcomes for all Supporting People's client groups. When it comes to supported housing in a domestic violence context it is important to establish specific outcomes for domestic violence services. Support needs of domestic violence victims are very different and to treat them in the same way as other client groups may have unintended and even life threatening consequences.

**United Response** – Pleased to see the commitment to developing an outcomes framework and the five high level outcomes areas are wide enough to allow personal outcomes to be delivered. Concern that

administering authorities are developing their own outcomes frameworks, reach 2 standards have recently developed to promote person centred outcomes in learning difficulty services, CSCL are in the process of developing their own outcomes framework; concern that a number of overlapping outcomes frameworks will be used to assess service quality and provider performance in the future and think this is confusing, potentially wasteful and places an unnecessary burden on providers and people using services. Would like to see a national outcome framework developed to prevent this occurring. Less sure about indicators of need and have concerns that this would work against attempts to be person centred. Think that any indicators of need should be agreed by the person being supported and others with a legitimate interest in their support and general wellbeing. Also concerned that the different treatment of excellent and non excellent authorities could also encourage a postcode lottery of those purchasing and using services.

**Chartered Institute of Housing** – The emphasis on measuring outcomes delivered by the services is an important step forward for the programme, and one that has been welcomed, although there are difficulties in measuring these as opposed to outputs at times. Adoption of five high level categories which also tie up with those found in *Every Child Matters* brings a streamlined and coherent approach. It is important that care is taken to adapt these high level outcomes appropriately and sensitively to the many different client groups receiving services under SP. The framework as suggested is sufficiently broad to allow local discretion for developing or continuing their own programmes for performance and outcomes measurement which is the more appropriate level for a more detailed and sensitive measurement of outcomes, direction of travel of services and service users. It should also ensure that it will not create additional burdens to either AAs or partners providers, given the work that has been going on in many areas to agree robust and flexible performance measurement schemes.

**Sheffield** – Strongly in favour of the emphasis on outcome frameworks in the continued development of SP. Concern about - the use of *Every Child Matters* as a framework has no clear rationale particularly as the majority of services are not delivered to children or young adults. Whilst this framework has its benefits, it is not clearly evidenced as being compatible to SP. It is open to question whether there is a sufficient focus on outcomes related to housing. No structured development work to develop a scope objectives and a business case for a national outcome measurement framework and it is therefore unclear what benefits this will deliver. Lack of structured consultation with SP teams and the private sector on

outcomes, leading to poor awareness and general anxiety about what is proposed. This may impact on the effectiveness of what is introduced. There does not appear to be a communication and consultation strategy for this project.

**Norfolk** – welcome the focus on outcomes as potentially enabling the demonstration of benefits of the programme, also welcome the CLG focus on outcomes as giving a lead and potentially ensuring consistence in this area. However they are concerned that a central government stipulation about the types of outcomes to be measured at the micro level (individual service & individual service user) will result in an inflexible and unhelpful system. Central Government should advocate the policy level changes it wishes to see and about which regular evidence is required. Local SP programmes should be required to collaborate with providers, service users and other stakeholders to collaborate on the development of outcomes measures within and across sectors

**Bath & North East Somerset** – CLG leading on outcomes work will help to promote a consistent approach across all LAs and is welcome for this reason.

**CLG's response** - We welcome the positive acknowledgement that a national Supporting People outcomes framework needed to be developed.

Since publishing the new outcomes framework, CLG and the outcome working group have progressed with the suggested outcomes framework. Whilst this was due to go live in April 2007, it is now the intention that the outcomes framework will be implemented in May 2007 with the possibility of the longer term service being implemented in June 2007.

CLG will no longer be looking at related BVPIs and PAF indicators, but will look to the outcomes framework to help demonstrate the worth of the programme. **KPI 1 and 2 which are mandatory will continue to be collected.**

We carried out a mini pilot during December 2006 and January 2007 with 9 authorities and 36 providers. Feedback from this pilot was very positive and encouraging. We are about to take forward a wider pilot

which will incorporate 22 authorities and 400 providers. This wider pilot commenced on Monday 26 March 2007 for 4 weeks. CLG will be carrying out training for all providers to ensure that they are sufficiently trained in completing the outcomes form.

CLG have recognised the need not to introduce any added bureaucracy to either the sector or authorities, and will not, therefore, be asking authorities to collect and analyse the data received from the outcomes form. The process for this will now be for providers to complete the outcomes form, there will be a short term service form which will be completed when the service user departs the service and another long term service form which will be completed on an annual basis. It is also envisaged that the support plan will provide the information required for the outcomes form and providers should be able to lift the information from the latest support plan which will also help in reducing any additional burden.

We will not be asking providers to complete a form for each individual service user in a long term form but will ask for a 10% representative sample to be completed. Once the form is completed the form will be returned to St Andrews (who also collect the Client Record Data). St Andrews will then analyse the forms on a quarterly basis and send the data back to CLG and authorities. Authorities will then be able to look at how their providers are performing both at a regional and national level. CLG will not be making this framework mandatory but will be strongly encouraging all authorities to ensure that their providers are completing the necessary forms. No further IT developments will be necessary as the St Andrews form will be web based. Should very small providers not have access to IT then it is for the AA to come to some agreement with the providers on how the form can be completed and returned back to St Andrews electronically. The outcomes framework is to look at what outcomes have been achieved by the service user.

As the framework is not mandatory CLG will not be setting any national targets against any of the indicators.

Many authorities asked why we did not adopt the DH seven outcomes contained in 'Our Health, Our Care Our Say' and instead adopted the DfES 'Every Child Matters' outcomes. The main reason for this is that we felt that 'Our Health, Our Care our Say' was very much focussed around the client groups in longer

term services and did not really reflect the socially excluded groups within the SP programme. Also, by the time the DH White Paper had been published we had already gone some way to developing the Supporting People framework and felt that the 'Every Child Matters' high level outcomes reflected the whole of the Supporting People programme.

Another key criterion of the outcome framework was to ensure that we had one framework which would fit with all client groups. Overall this has been widely accepted and, again, the main reason for doing this was because CLG were keen to keep the framework simple and to the minimum.

The outcomes framework and guidance is on the Supporting People Knowledge website (kweb) under 'Outcomes'.

### **Client Groups**

**Rotherham** – The addition of "problem families" to the list of vulnerable service user groups addressed by SP raises the need for review and revision of existing priorities. A new needs map and prioritisation of unmet need will be required. CLG should clarify the implications of this client group addition for the benefit of administering authorities.

**Cambridgeshire** – The guidance asks authorities to consider the extent to which being an asylum seeker may render an individual to be in need of support. Whilst Cambridgeshire appreciate that asylum seekers may well have housing related support needs we understood that until they were given leave to remain they were not eligible for SP. CLG in conjunction with the Home office should provide clear guidance on where it is and is not appropriate to use SP funding to support asylum seekers.

**Nottinghamshire** – box contained in paragraph 16 (p11) caused some surprise with the addition to the current list of people with vulnerabilities of the heading "problem families". The use of this term is not supported and is seen as only reinforcing stereotypes regarding "neighbours from hell" which the programme works hard to address through its work around social inclusion and community cohesion. It is proposed that the list of user groups identified in this box is aligned with existing user groups. This enables reporting to CLG and at regional and local level – on these groups from SPLS, as outlines in the statutory guidance paragraphs 30 to 32. This could be revised to ensure it is more in line with the three strategic

areas outlined in "Creating Sustainable Communities: Supporting Independence" although it is important to ensure changes to these definitions are mapped to existing client groups to enable data gathered in the programme's first three years to retain some validity and inform future plans. Terminology used to define user groups should be revisited as difficulties have been identified locally for example in defining tenancy sustainment services and other homelessness prevention services. Redefinition would be helpful and could take place without disturbing the current SPLS datasets.

**Brent** – Note that the definitions of client groups now combine client groups previously listed as separate groups, to make the link with homelessness and preventing homeless more strongly. Also note the introduction of a group as "problem families" which will be difficult to define. Suggests that the link with homelessness and anti-social behaviour should be made more specific in this client grouping, perhaps "families at risk of anti-social behaviour" would be more transparent and less judgemental.

**East Sussex** - Reference to problem families on pg 13 is not helpful. Would prefer something like "families at risk" or families with support needs.

**Peterborough** – Concerned that asylum seekers were included in the category of vulnerable people which may render them in need of support as the understanding is that NASS is funded to provide these services. If there is to be a widening of eligibility to include asylum seekers who are not currently eligible for SP services clarity from CLG about where additional funding is to come from for services to meet these needs will be required

**Norfolk** – Opportunity is not taken to recognise that some gypsies are in fixed, permanent accommodation and no longer travel but retain a gypsy traveller identity and culture. The identification of asylum seekers as potential users of SP services is generally welcome as it reflects needs being presented at SP funded services (homeless and destitute asylum seekers, women without recourse to public funds who are experiencing domestic violence) However CLG should in conjunction with the Home Office seek to provide clear guidance on the circumstances in which it is and is not appropriate to use SP funding to support asylum seekers. If there is a widening in respect of the eligibility of large numbers of asylum seekers who are currently eligible for SO services there would need to be accompanying clarity

about where any additional funding is to come from for services to meet these needs.

**CLG's response** - Supporting People services are not included on the list of income related benefits under the 'public funds' classification published by the Immigration and Nationality Directorate. For this reason the reference to asylum seekers in the Guidance has been retained. The list of client groups included in the Guidance is not comprehensive. The decision to fund any type of Supporting People services is a matter for administering authorities based on local needs and priorities as set out in their local 5 year strategies.

Following suggestions from some administering authorities, CLG has decided to reclassify 'problem families' as 'families at risk'.

#### **Eligible welfare services**

**Nottinghamshire** – retention of guidance relating to eligible welfare services is very welcome and does not appear to depart from programme's original statutory guidance; if it does, it would be helpful if these departures were specifically highlighted. The retention of the "institutional care to independent housing" test which is important in differentiating the programme and its services from those of statutory agencies provided under specific duties is also particularly welcome. It would be helpful if the section on Handypersons services, paragraphs 40 to 45 were referenced in this section, also as handypersons service now fall within the eligible welfare services definitions. It is suggested that paragraph 16 may require amendment to reflect handypersons services which may not routinely be provided as part of an agreed package of support.

**Essex** – List of "sources of vulnerability" suggests a focus on support to people with multiple needs, which is welcomed. However, it does not mention "people at risk of homelessness" suggesting that with regards to homelessness SP should be focussing on people with an existing homelessness history. This is not in line with the emphasis on low level preventative support that the guidance document espouses. The guidance also states that SP is and remains ring-fenced but also that SP should work with the IBs pilot to deliver joint objectives. This will require well chosen freedoms and flexibilities that need to be developed on from the experience of the current pilots. Essex also urge for caution in the development of a role for individual budgets in short-term services i.e. people with chaotic life styles or complex needs.

**East Sussex** – “Eligible welfare services” says “SP service recipients may be in receipt of services of a more generic nature, which would required irrespective of a service user’s living situation”. This needs to be clarified or expanded further.

**Enfield** – Clarification on page 9, point 11 was particularly welcomed. In relation to where a person moves from institutional care to a supported tenancy, SP should only fund the new services directly associated with the more independent housing arrangement, and not the services previously in place and paid for by other budgets.

**Nottingham** – The guidance offers a very useful guide to local authorities and partners in relation to the Supporting People programme. The definition of eligible services are helpful, particularly the inclusion of activities that are not eligible for funding.

**North Somerset** – Examples of ‘statutory duty’ such as funding of care leavers might help. There is still confusion between care and support, especially for older people due to the FACS criteria level being evoked. It means that people who might have had care before may not do so now. However, the service user has same need and task type which might be taken on by SP causing confusion about eligibility.

**SP East Region Group** – welcomes the clear statement on the use of SP funding and the detailed definition of housing related support.

**Foundations** – The third bullet point refers to ‘tidying the garden for an elderly person perhaps allow support workers to access the property to deliver support’. This service would probably be carried out by a handyperson service in most instances and as handyperson services are discussed in more detail later in the guidance – perhaps CLG should replace this example with a different one.

**Orbit Group** - seems late to be giving this guidance but is welcomed and will hopefully be a driver in discussions between providers and AAs in developing services.

**Cornwall** – The provision of 'occasional welfare services' is a welcomed clarification of the flexibility within the grant conditions for services that will improve accessibility of services for some of the most vulnerable people in our communities

**Peterborough** - The commissioning body welcomes guidance on eligible and occasional welfare services and how SP funding can be used in conjunction with other services and funding streams such as social care and health, with SP funding being restricted to 'enable or sustaining independent living'.

**United Response** – Description of housing related support is helpful and clear. It is positive that there is confirmation that sustaining independent living is a legitimate function of housing related support and important that sustaining independent living skills can take a long time.

**Chartered Institute for Housing** - Guidance lacks the emphasis on maintaining diversity of providers in the earliest issue and also on upholding the promotion of choice/balance of eligibility criteria in sheltered housing. Issues around the importance of value for money agenda that is providing severe challenges to small and specific providers and some sheltered scheme. Concerned that maintaining choice, diversity and balance can be lost in the direction of travel for the programme in some areas and would welcome reiteration of these values in the guidance which would also be in line with Best Value Principles.

**Norfolk** – Welcomes the clarity of emphasis on the use of SP funding for housing related support services to promote or sustain independent living skills

**Bath & North East Somerset** – Welcome the additional guidance on eligible welfare services in particular section 8, *housing related support services*, however further detail in relation to specific activities that a support provider may legitimately deliver would be even more useful. This is a question that providers have asked and continue to ask since the start of the programme.

Section 9 poses useful questions about how a decision can be made about whether a service is delivering housing related support services. Presumably the answer to both questions should be 'yes' for a service to qualify but also recognise that where this type of support is delivered as part of a whole package, the

issue of what is and what is not eligible under SP becomes blurred and so a task list is helpful. The section on *other eligible welfare services* is helpful and the examples given of occasional welfare services are clear. Would welcome some clarity on when an occasional welfare service becomes ineligible or crosses the boundary into social or personal care for example frequency, duration etc.

**CLG's response** – CLG is working with colleagues across Government in exploring how the personalisation, choice and control agenda could be extended to short term services and particularly for people with chaotic lifestyles; one model being considered is the concept of 'lead professionals'. We acknowledge that there is still a lot of work to be done around this and we want to continue to explore this.

**Monitoring and Contract Compliance**

**Nottinghamshire** – It may be helpful to reference QAF level C as a minimum standard for Supporting People funded services given the success of the QAF as a quality framework which provides a clear minimum standard for the sector.

**Cornwall** – disappointing that there is no longer a requirement for the QAF to be used as part of future service reviews. QAF is now an established and respected tool for monitoring and working towards continuous improvement. It is now well respected by providers and is seen as one of the most positive aspects of the changes that have been brought to the sector since April 2003.

**Chartered Institute of Housing** – the guidance is clearly streamlined to reflect local autonomy of the programme in terms of AAs developing their own monitoring processes for measuring acceptable performance and quality. Guidance acknowledges that the QAF is still available as a tool that will assist AAs to meet reporting requirements from the secretary of state. Believes that the QAF has contributed to the supported housing sector in terms of both setting out acceptable baselines for services and for encouraging a dynamic context for continuous improvement – this should be encouraged as a valuable tool to continue in use.

**Norfolk** - The requirement to complete client record forms should be a stipulation of contracts and as should the requirement for providers to supply any information which may be required by CLG

**Bath & North East Somerset** – Contract monitoring section, particularly the involvement of service users is welcome as is the ongoing requirement to use the QAF as this has proved to be an effective tool in raising standards.

**CLG's response** – CLG recognises that the use of QAF has been successful in raising standards of Supporting People services and would encourage authorities to continue to use QAF as a monitoring tool for the agreements they have with providers.

**Nottinghamshire** – Inclusion of specific reference to LAAs is welcomed. The direction of the national Supporting People strategy in this area is awaited. The reference in paragraph 27 to Social Services should perhaps be amended to read Adult Social Care.

**Chartered Institute of Housing** – There is a clear aim to streamline this programme with the wider framework for local government as reinforced in the recent Local Government White Paper. This is useful and it is important that the very valuable contribution to wider wellbeing and sustainable communities delivered by SP services are better understood given the strong steer in the White Paper that the current ringfencing will not be maintained in the longer term. Commissioning Bodies and Administering Authorities should work together to promote more widespread understanding of Supporting People services, in particular the appropriate role of the services with the focus on prevention and the contribution this makes to wider agendas. It may be that, in looking at how to involve communities more closely in the design and delivery of services, the AA and CB will be able to address the issue of diversity of service and provider. Establishing it firmly within the wider context and greater partnership focus as set out in the White Paper will also ensure that innovative services are developed to meet local needs that are valued and adequately funded.

**Norfolk** - Previous expectation that all CB authorities be involved in the development of the strategy is replaced with a stipulation about the responsibility of CB to implement and keep the strategy under review. New guidance spells out the expectation that CB will have an active role in the LAA and the pilot on IBs.

**Bath & North East Somerset** – Ongoing requirement for CBs is welcome as this has proved to be a useful tool for developing partnership working and joint strategic planning/commissioning. Further clarity

on how the AA should support the CB would be welcome. The link between CB and LAAs is helpful however Bath & North East Somerset approach up until the introduction of LAAs is to integrate SP within the Community Strategy framework and its delivery plans. A further layer of complexity has now been added with the requirement for CBs to be active in developing LAAs. More clarity on the whole picture, including how CPA should fit together would be welcome.

**United Response** – It is positive that the requirement that each commissioning body must take an active role in both local area agreements and the work of the Individual Budget pilots is of vital importance. However, concerned that the directions and conditions with this consultation could be used by administering authorities to undermine any attempt to implement Self Directed Support because Supporting People grant continues to be focussed on very specific tasks and duties and attached to very narrow eligibility criteria.

**Essex** – Currently reviewing its governance arrangements, but given the size and complexity of its two tier structure (including 12 districts, 5 PCTs, 3 housing sub regions, 4 planning areas), the suggestion of a vote per organisation is not likely to produce a workable governance structure.

**Brent** – Welcomes the continuation of a Commissioning Body specifically relating to SP commissioning. Note that guidance states that the grant should have an active role within LAAs, without being specific on how this should be achieved. Would like to see further details on how this can be achieved in the forthcoming SP strategy.

**CLG's response** – We will provide examples of good practice and alternative governance arrangements in relation to Commissioning Bodies and LAAs in order to support Administering Authorities as we take forward the work on the delivery of Supporting People through LAAs. We are also mindful of the impact of Supporting People grant conditions on the personalisation and choice agenda and have already made changes to the grant conditions to enable the pilots to deliver. We will look at this again when a decision has been taken on how the agenda is to be taken forward.

**Nottinghamshire** – List of cross authority groups listed in schedule 1 is inaccurate and does not reflect the information provided to CLG by this authority. CAGs were defined for AAs by ODPM, for authorities

**Cross Authority access to services**

such as Nottinghamshire (CAG: Nottingham, Nottinghamshire, Derby, Derbyshire) the CAG reflects only a small number of the authorities bordering on the county.

**Orbit Group** – This is more needed clarification to avert the difficulty for providers and service users particularly around move on accommodation. Access and future need will be clearly defined within the 5 year strategy. Concerns over excellent authorities not bound by this particularly in light of the change of ratings. What happens if an excellent Authority loses its star rating and is then subject to this guidance? This will have a knock on effect for those working cross authority that have excellent and non excellent AAs to deal with.

**Sheffield** – Emphasis on cross authority working is welcome but guidance does not mention regional working. This is the level at which joint work can deliver the majority of efficiency gains and strategic benefits for example through roll out of VIPs. Would prefer to see an emphasis on using the established network of regional groups to plan services and develop the programme. If this was given support in the guidance it would help to ensure that all authorities engaged with regional working.

**CLG's response** – Historically, where an Administering Authority's CPA rating changes during a financial year, the authority will continue to be bound by the appropriate grant conditions prior to this change. The new rating will therefore take effect from the following financial year.

Following contact with Nottinghamshire, the entry in Schedule 1 of the authority's group has been amended.

## Charging Regime

**Nottinghamshire** – Paragraph 38 makes reference to interim charging arrangements which should no longer apply.

**East Sussex** - Paragraph 39 in "Charging Regime" says "Whether a service provider has a contract with an Administering Authority or not the amount the authority pays the service provider must be equal to the amount of the relief to be awarded." This is not clear. Needs further clarification.

**Havering** – Paragraph 39 may be intended to cover the introduction of IBs but this seems to be to some extent contradictory if applied to leaseholders and could do with some further clarification on the intention behind this paragraph. Paragraph 38 appears to be releasing authorities from the need to pay 100% of eligible costs if they choose through a charging policy to do so. Most authorities are controlling how much they pay through contracting greater/lesser amounts – grateful for further clarification on the intention behind this paragraph? Does it mean that in practice an AA could contract a service at say £20 per unit per week and choose for whatever reason to pay only £15 for some individuals for example?

**Bath & North East Somerset** – Section 39 will help address concerns concerning practice amongst some providers of charging users at a different rate from the amount of SP grant received.

**CLG's response** – Amendments have been made to relevant sections of the Guidance to take account of comments from authorities, where necessary.

**Leaseholder Policy**  
**Devon** – Devon's SP joint commissioning body has agreed a leaseholder policy as required but has yet omitted to detail how the results of any quality and value for money assessment of leaseholder services could be practically applied to achieve change in existing and future provisions of this sort. Directions and Grant conditions 2006 appear to reflect a more prescriptive relationship from the AA towards service users who are leaseholders than that of the past. Whilst appreciating how publishing local analysis and guidance of current prices and standards could assist service users make more informed, Devon believes that continuation of service user decision making is often a better way forward for managing these aspects of leaseholder provisions, than a requirement for direct intervention by an AA.

**Leicestershire** - Inclusion of guidance on leaseholders is very welcomed.

**Rotherham** - Guidance on leaseholders seems suitable as the CB has agreed a new leaseholder policy which will be reviewed annually.

**Havering** – Assume that paragraph 18 supersedes and replaces the previous requirement that AAs should not pay leaseholder charges unless they have established that the service is strategically relevant, value for money and of good quality?

**Orbit Group** - Requirement for commissioning bodies to have a clear Leaseholder policy is welcomed provided they pay for the services – problems for leaseholders if charges are higher than the AA will pay resulting in a shortfall for leaseholders to pay. This should be avoided but at the very least there should be some transitional arrangements put in place.

**Cornwall** – Although the new grant conditions require a local leaseholder policy regarding entitlement and payment of SP grant to service users to be in place, an opportunity has been missed to bring the leaseholder sector into line with the rented sector. Situation remains where SP grant is being used to fund services to older people within owner occupied sheltered schemes which are not subject to the same monitoring and quality assurance requirements as services provided to older people who live within rented sheltered schemes.

**Bath & North East Somerset** – Flexibility around leaseholders is welcome and much needed in order to reflect the diversity of the issues arising across different Las.

**CLG's response** – The introduction of the leaseholder enabling clause in the grant conditions in 2006/07 was to ensure that any existing or new leaseholders have clear information on whether or not their Administering Authority will fund the housing related support element of their service charge. We have no plans to amend this requirement in the grant conditions as it is a matter for authorities to decide on local funding matters based on local needs and priorities.

**Nottinghamshire** - It would be helpful if section on handypersons paragraphs 40 to 45 were referenced in this section also as handypersons services now fall within the eligible welfare services definition. It is suggested that Para 16 may require amendment to reflect handyperson's services which may not routinely be provided as part of an agreed package of support.

**Enfield** – Have some concerns regarding eligibility of handypersons services. Concerned that Grant conditions regarding AAs being enabled to fund a variety of maintenance tasks and minor repairs with the maximum length of time being up to 16 hrs may lead to some larger structural jobs being undertaken. Different elements of the same job could potentially be put forward as different jobs altogether. No

suggesting that handyperson's services check eligibility when conducting certain types of alterations but are concerned that landlords may pass on their duties and charge the work to handypersons schemes, which could result in time and money being taken away from other "minor" eligible tasks that are needed for other vulnerable people. Pleased about Condition 45 regarding exclusions from handypersons services which includes the use of some flexibility regarding the purchase of tools and materials, however the current wording allows potential for larger items to be charged.

**North Somerset** - Re: paragraphs 22/23 - Is it by implication that the Handypersons Service would only be delivered by Care & Repair (HIAs)? This does not tie in with paragraph 43 as most DFG services are linked to C & R operations.

**Rochdale** – Major factor contributing to cost effectiveness is the very large size of the handyperson scheme and the cost effectiveness and economies of scale of having sufficient funding to operate a large Handyperson's scheme are evident. The eligibility criteria is therefore welcomed, which will allow the commissioning body to consider whether the future development of the scheme fits within the overall key priorities of the authority's SP programme and whether the use of SP funding can help ensure that this scheme continues to fill a gap in service provision.

**Nottingham** – The definition of eligible handyperson services is also helpful however the suggested maximum time of 16 hours per task goes beyond what a handyperson may reasonably be expected to do. Suggest a maximum of 8 hours per week would be more in line with the sorts of activities that would be carried out for each week or service user.

**Foundations** – Previous consultation response to CLG on SP strategy foundations set out a number of the sector's concerns in relation to the progress and development of the SP programme. These concerns still remain and have grown in relation to experiences. Pleased to see the inclusion of HIA handyperson services within 2006 SP funding for the first time and pleased to see handyperson schemes receiving specific attention in the SP guidance. A delicate balance needs to be maintained in relation to guidance referring to the work of HIAs and add on handy person services. Many clients value highly 'the small things' that can be achieved through the work of a handyperson. In a vast majority of cases a

handyperson service is more successful and effective if it is placed within a full HIA service rather than as an alternative to it.

The description of a handy person service refers to "burglar alarms" however this is not typical of the kind of work they carry out. Would be more appropriate for the guidance to refer to "home security measures". Recommend that this section is reworded.

Section 15 regarding 'an in some cases, services which are provided for carrying out maintenance.....' Would advise that CLG does not include the term 'in some cases', or if it does need to define the type of cases.

Foundation's previous response to SP strategy consultation stated that a very small proportion of the SP budget is spent on HIAs, and that agencies do not fit into the SP model and that there is a case for a separate funding stream for HIAs. There is a danger that HIAs will be considered as service providers in the context of SP and older people alone, when they actually deliver a wide range of targets for different government departments as highlighted in "A sure start to later life". CLG's review of the DFG system noted that there is a need to plan a change in arrangements for core funding of agencies involved in the delivery of DFG. Creating a statutory basis for full HIA services would be one way to achieve such security for HIAs as well as providing separate funding stream for them.

**Orbit Group** - Details and recognition about this service provision is welcomed.

**SP East Region Group** – welcome the guidance around the funding of handyperson services

**Cornwall** – The inclusion of handypersons schemes within funding eligibility is warmly welcomed and gives stability of funding to these schemes as well as reinforcing SP role as the commissioners of preventative services

**Chartered Institute of Housing** – Expanded explanation of services in the draft guidance is welcome and will strengthen its use and role in the wider prevention agenda.

**Sheffield** – Welcome the inclusion of handypersons schemes within SP as a commonsense approach to deliver more customer focused services.

**Norfolk** – Guidance provides definition and illustration of these services, - welcomes the extension of SP funding to minor repairs within the parameters set out in the guidance and grant conditions. Guidance makes clear the expectations but also allows some flexibility.

**Bath & North East Somerset** – Guidance and inclusion of Handypersons services is welcome.

**CLG's response** – There are no plans to make changes to the handypersons guidance – this was consulted on in 2006.

**North Somerset** – Still problems with data retention and transition nationally based on LOGASnet comparison with SPLS. This is both for financial and statistical data. It is not a specific item for the consultation but further IT investment in this area is essential if we are to judge performance accurately. Great pity that sheltered accommodation has still been excluded from the requirement for CR forms - this was very important to North Somerset due to imported service users looking for a better climate and access to care and health services. It does not make it clear if in house sheltered are to comply or not.

**United Response** – concerned that the different treatment of excellent and non excellent authorities could encourage a postcode lottery for those purchasing and using services. Also concerned that the directions and conditions with this consultation could be used by AAs to undermine any attempt to implement self directed support in the sense that SP grant continues to be focussed on very specific tasks and duties and attached to very narrow eligibility criteria

**CLG response** – The introduction of a national outcomes framework will refocus attention on one of the principles of Supporting People – that is, to ensure service user involvement in the designing, delivery and monitoring of the programme, thereby ensuring that the services provided meet the needs of service users. CLG already contributes to the administrative costs of administering Supporting People locally through its allocation of the administration grant.

## Individual Budgets

**Cambridgeshire** – Cambridgeshire shares CLG's view towards strengthening choice and control but feel that IB is just one possible method by which this can be achieved. Significant emphasis is being placed on IB when it is unlikely to be appropriate in all cases and there may be more appropriate methods and approaches that should be considered as well, rather than encourage all Authorities to pursue one route.

**United Response** – Positive that the requirement that each CB must take an active role in both LAAs and the work of IB pilots is of vital importance. This needs to be delivered in practice as they are aware that in some local authority areas that SP teams are not necessarily engaged with the latter.

**Bath & North East Somerset** – Pilot site for IBs and has committed to including SP funding in the project. Sadly the freedom to use SP grant to fund IBs does not come with any guidance on how this might be achieved, particularly when the majority of resources is tied up in contracts.

## Rotherham - Commissioners support the development of Individual Budgets.

**CLG's response** – CLG acknowledges that Individual Budget is just one mechanism for delivering choice and control and in no sense has a model been developed. It is important to learn from the experience of the pilot that is currently underway in 13 local authorities in order to move this agenda forward. We are planning to have a seminar for Supporting People teams in the 13 pilot sites, and the focus of this third seminar will be around the practical application (including contracting issues) of the individual budgets principles and what this means for Supporting People. It will also look at what else CLG could be doing to help facilitate a smooth delivery of the principles.

Freedom to use some of SP funding for IBs is only available to those AAs that are currently included within the 13 pilots, and because IBs are one aspect of the personalisation and choice agenda they should not be seen as the only delivery method. Once the decision has been taken on how we take forward the personalisation and choice agenda we will need to look at the impact on Supporting People.

**North Somerset** - Great pity that sheltered accommodation has still been excluded from the requirement for Client Record forms. This is very important due to 'imported' service users looking at a better climate and access to care and health services. It does not make it clear if 'in house' sheltered are to comply or

not.

**Chartered Institute of Housing** – The guidance lacks the emphasis on maintaining diversity of providers in the earliest issue of the guidance, and also on upholding the promotion of choice/balance of eligibility criteria in sheltered housing. There are issues around the importance of the value for money agenda that is providing severe challenges to small and specialist providers, and some sheltered schemes. Concerned that maintaining choice, diversity and balance can be lost in the direction of travel for the programme in some areas and would welcome reiteration of these values in the guidance, which would also be in line with Best Value principles.

**Bath & North East Somerset** – Clarity on ringfencing is very welcome.

**Foundations** – With regards to section 32, Foundations has a clear role to play in working closely with the CLG in relation to ensuring that HIA data is submitted and generated in the most suitable format for government in the future. Would be happy to talk to CLG further about the requirements for carrying out this process with reference to Foundations Monitoring Information System.