

Controlling Migration Fund evaluation

Project-level evaluation report

Lead LA: Oxford City Council

Project name: Rogue Landlords and Rough Sleeping



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Contents

Executive Summary	5
1 Introduction	10
The area context	10
The CMF-funded project	12
Project objectives	12
2 Methodology	17
Overview of evaluation approach	17
Methodological strengths	19
Methodological limitations	19
Analysis and synthesis	20
3 Key findings: delivery	21
Introduction	21
Was the project delivered as intended?	21
What worked in delivering the project?	24
What were the challenges to delivering the project?	28
4 Key findings: Outcomes	33
Progress towards intended outcomes	33
Progress towards longer-term outcomes	42
5 Key findings: Value for Money	44

Introduction	44
Value for money assessment	44
6 Conclusions and lessons learned	50
What works?	50
For whom?	51
In what circumstances?	52
Could the project be replicated?	52
Could the project be scaled up?	53
Is there evidence of sustainability beyond the lifetime of the project?	53
7. Appendix 1: Methodology and technical note	55
Appendix 2: Controlling Migration Fund Theory of Change	67
Appendix 3: Research tools	72

Executive Summary

This project-level evaluation report presents the key findings relating to the delivery and outcomes for the **Rogue Landlords and Rough Sleeping** project led by **Oxford City Council**.

Project overview and objectives

Oxford City Council received £409,319 Controlling Migration Fund (CMF) funding for the Rogue Landlords and Rough Sleeping project. The project aimed to address housing issues previously identified in the city, including: rogue landlords operating unlawful and substandard dwellings and exploiting migrant occupants; illegal encampments on public land; and rough sleeping among migrants from the European Economic Area (EEA). The project also aimed to address resident concerns about these issues through engaging residents and communicating the enforcement action undertaken.

The Rogue Landlords strand used the funding to employ three additional staff members to the Private Sector Safety Team: an Environmental Health Officer, a Compliance Assistant and a Planning Enforcement Officer, tasked with undertaking targeted investigations of suspected unlawful dwellings and illegal encampments and enforcement action where required. The Rough Sleeping strand was outsourced to St Mungo's homelessness charity. CMF funding provided a single unit of short-term (28 days) accommodation intended to be used by EEA rough sleepers, and the creation of an "EEA Migrant Worker" role to lead an outreach programme for the EEA rough sleeping population. These activities aimed to contribute towards the CMF outcomes listed in Table 1.1 below.

A theory-based approach was taken to the evaluation, with the aim of reviewing and testing the outputs and outcomes intended through the project activities.¹ Evaluation activities included in-depth interviews with project staff, wider delivery partners and stakeholders on both project strands, and with project beneficiaries on the Rough Sleeping strand. It also included a review of monitoring information and secondary data shared by the project.

Progress towards intended outcomes

Progress towards intended CMF-level intermediate and longer-term outcomes is summarised in table 1.1 below. The evaluation found evidence that the project contributed towards four intended CMF outcomes, while evidence of contribution towards two outcomes was more mixed. Outcomes related to wider residents were less conclusive, due to the evaluation not directly exploring resident perspectives, as well as the fact that resident complaints data was not considered to provide the expected insight into the intended outcomes.

¹ Theory-based approaches to evaluation use an explicit theory of change to draw conclusions about whether and how an intervention contributed to observed results. For more information, see: <https://www.canada.ca/en/treasury-board-secretariat/services/audit-evaluation/centre-excellence-evaluation/theory-based-approaches-evaluation-concepts-practices.html>

Table 1.1: Summary of project CMF outcomes

Intended Outcome	Assessment of progress made to December 2019
Intermediate outcome 1: Increased insight into local migration patterns	The evidence suggests that both project strands generated insight for the local authority: the Rough Sleeping strand regarding the EEA Rough Sleeping population; and the Rogue Landlords strand regarding substandard housing (although this did not result in as much insight regarding migration patterns, beyond the scale of the issue being less than anticipated).
Longer-term outcome 1: Increased revenue from enforcement action	The PSST issued two civil penalties resulting in fines totalling £6,500.
Intermediate outcome 2: Housing issues identified	<p>The Rogue Landlords strand exceeded its target for investigating suspected substandard properties and all reported illegal encampments. While there was less engagement than expected from residents regarding housing issues, staff suggested that this was likely due to the issue being less prevalent than originally anticipated.</p> <p>On the Rough Sleeping strand, evidence indicates that the EEA Migrant Worker role contributed to identifying the issues faced by beneficiaries in accessing housing.</p>
Intermediate outcome 3: Housing issues resolved	<p>Available evidence indicates that the Rogue Landlords strand resulted in improvements to housing conditions where issues were enforcement action was taken. There was less evidence on whether this resulted in resolution of housing issues for occupants of substandard dwellings and illegal encampments (beyond referrals to wider support organisations).</p> <p>For the Rough Sleeping strand, the evidence suggests the project had not contributed substantially to resolving housing issues – particularly keeping to the original 28-day target for pathway accommodation – at the time of the evaluation. However, the EEA Migrant Worker was working to overcome barriers</p>

	to addressing housing issues with beneficiaries. Therefore, it was too early in project delivery to dismiss eventual contribution to this outcome. The evidence also indicates that the Rough Sleeping strand was contributing towards supporting beneficiaries to return to their country of origin, where appropriate.
Intermediate outcome 4: Increased access to public services	The evidence suggests that the Rough Sleeping strand was providing individualised support to beneficiaries to overcome barriers to accessing services and had contributed towards this outcome for some. As delivery was planned to continue until March 2021, it is likely the project will contribute further to this outcome in future.
Intermediate outcome 5: Increased confidence that resident concerns are being listened to and addressed	The evidence suggests that the Rogue Landlords strand had put in place measures to listen to and address resident concerns. Evidence of whether residents were aware of this, or that their confidence had increased, was beyond the scope of the evaluation.
Intermediate outcome 6: Fewer instances of nuisance or anti-social behaviour	While the Rogue Landlords strand contributed towards removing illegal encampments, evidence was lacking as to whether this was a sustainable solution. The evidence suggests that the Rogue Landlords contributed towards identifying over-occupied properties and referring cases to the appropriate team. As resident complaints data was subsequently not considered a suitable metric for project outcomes related to addressing anti-social behaviour, there was no conclusive evidence available to the evaluation regarding this outcome.

Based on the contribution of the project towards the intermediate outcomes above, there is evidence to suggest that, in future, the project activities are likely to contribute towards providing evidence for future service planning for the local authority; improved cleanliness and quality of the local area for wider residents, and improved wellbeing and increased living standards for migrant rough sleepers (although contribution towards this longer-term outcome is less conclusive for occupants of substandard dwellings investigated by the Rogue Landlords strand). There less evidence that project activities would contribute to

improved perceptions of migrants among wider residents, in part due to an absence of evidence related to wider resident perceptions.

What works?

- The dedicated resource to address a specific issue and population ensured delivery teams had the necessary capabilities and capacity to deliver on the project objectives, particularly in terms of engaging and working with vulnerable target populations, such as migrant rough sleepers.
- Linked to the above, the consistent, intensive engagement and support from skilled professional (the EEA Migrant Worker) overcame entrenched barriers to engagement from a vulnerable population (EEA rough sleepers).
- Partnership working with local organisations (including specialist charities and services with experience of working with specific populations, such as homeless people or victims of trafficking) widened the scope of support that the project could provide to both migrant rough sleepers and occupants of substandard dwellings.
- While the project took an evidence-based approach to the project design, it faced challenges to accurately assessing the nature and extent of the issue of unlawful dwellings, in part due to the transient nature of private sector housing and the unreliability of resident complaints
- Project delays meant that the two strands were unable to complement one another and were not delivered as envisaged. This was mitigated to some extent through partnership working with wider organisations.
- EEA migrant rough sleepers were found to have complex underlying needs – specifically substance abuse. While this insight was useful for the local authority and future service planning, it meant the planned “pathway model” was unsuitable for many beneficiaries.

For whom?

- The local authority gained insight into the scale and nature of the issue of substandard dwellings, illegal encampments, and EEA rough sleepers in the city. Evidence indicates that this learning will be applied to future planning and resource allocation.
- The extent to which residents benefited from the project was less clear. Resident complaints were addressed by the Rogue Landlords strand through investigation and enforcement activities and mechanisms were put in place for dialogue with residents. However, there was less interaction with residents than expected (potentially due to the issue being less of a priority for residents).
- The benefit of the Rogue Landlords strand to migrants was relatively limited in the sense that the scale of the problem was difficult to decipher and may have been over-estimated based on existing data, or more hidden than anticipated. However, the knowledge gained by enforcement staff through training to help them recognise the signs of trafficking may benefit migrants in future.

- The Rough Sleeping strand engaged and improved understanding of the needs of EEA migrant rough sleepers. While outcomes achieved pertained to a small number of beneficiaries, as the project is in an early stage of delivery, this strand may contribute further to this outcome in future.

In what circumstances?

Progress towards outputs and outcomes was greatest where delivery agencies were able to provide some combination of:

- upskilling or identifying staff with suitable skills to meet the demands of the role and needs of their target population and intended beneficiaries;
- a collaborative delivery approach and leveraging existing infrastructure to support delivery; and
- reliable identification and engagement of the target beneficiary population.

1 Introduction

The Department for Levelling Up, Housing and Communities (DLUHC) then known as Ministry of Housing, Communities and Local Government commissioned Ipsos MORI alongside the Migration Observatory at the University of Oxford to conduct an independent evaluation of the Controlling Migration Fund (CMF) in May 2018. Launched in November 2016, the Controlling Migration Fund (CMF) aims to help local authorities across England develop and deliver activities to mitigate the perceived negative impacts of recent and unexpected migration on communities in their area. DLUHC provided funding to local authorities to deliver projects that aim to address local service pressures, tailored to their context and needs. While the primary emphasis is on relieving pressure on public services in a way that delivers benefits to the established population, the fund also seeks to support wider community cohesion and the integration of recent migrants. Interventions can also focus on gaining a greater understanding of the local migration data landscape where there is currently a lack of accurate local data.

Project-level evaluations of 14 CMF-funded projects were conducted as part of the CMF evaluation. The project-level evaluations aim to assess the effectiveness of various project approaches in delivering against their local-level objectives and those of the wider fund.² They seek to build an understanding of what works, for whom and in what context, to relieve pressure on local services due to recent or unexpected migration. This project-level evaluation report presents the key findings relating to the delivery and outcomes for the ***Rogue Landlords and Rough Sleeping*** project led by Oxford City Council.

The area context

Oxford City Council (OCC) applied for CMF funding after identifying a number of housing issues which the local authority attributed in part to increased migration to the area. In the application for CMF funding, OCC cited evidence suggesting that migrants were at risk of poor housing conditions due to reliance on private landlords to meet their housing needs. Existing data collected by the local authority on housing enforcement suggested that rogue landlords were exploiting migrants by offering substandard accommodation.³ Local authority data from 2016 showed that half (50%) of suspected unlawful dwellings investigated were occupied by migrants.⁴ Furthermore, of the 156 tenants provided with tenancy advice due to unlawful eviction or threatened eviction in 2016, three-quarters (76%) were identified by the local authority as migrants.⁵ Based on previous research undertaken by OCC, the CMF bid estimated that there were 979 potentially unlawful, substandard sites of accommodation ('beds in sheds') in Oxford requiring on-site investigation. Project staff highlighted that this often involved garages and other

² An overall Theory of Change, created during the scoping stage, outlines the intermediate and longer-term fund outcomes (see Appendix 2).

³ The bid categorised substandard accommodation in Oxford into the following broad categories: Properties occupied by families (in poor condition and overcrowded); Houses in Multiple Occupation (HMOs) that fall outside of the scope of funding from the HMO Licensing Scheme; unlawful dwellings (otherwise referred to as 'beds in sheds', these comprise converted garages or other converted structures or are purpose built for use as accommodation and are usually located at the rear of a property); Encampments (accommodation in public open spaces).

⁴ Data included in the CMF bid to support the funding application.

⁵ Ibid.

outbuildings being converted into a dwelling without planning permission and unfit for habitation.

The OCC also identified a recent phenomenon of illegal “encampments” being set up in public open spaces in the city, which they attributed to challenges accessing housing, including high rents. Previous enforcement action identified that over half of occupants of such encampments (60%) were migrants.⁶ These encampments were considered to create unsanitary conditions requiring environmental action, as well as issues for landowners seeking to remove encampments from their land. The bid also cited a “significant increase” in complaints from residents in relation to these encampments, which were considered to create “no-go” areas in the city, as well as unsanitary conditions. Poor housing conditions were also associated with an increase in resident complaints to the City Council,⁷ including for anti-social behaviour, noise, and accumulations of refuse and waste. The bid cited anecdotal information gathered from local councillors, local authority front line staff, and wider agencies (such as the police) regarding growing feelings of unfairness about access to services in some more deprived communities in relation to recent migrants, which the local authority attributed in part to housing conditions.

Oxford also experienced an increase in rough sleeping, particularly from the end of 2015 to mid-2016/17.⁸ Street count data from November 2018 identified 45 people sleeping rough in Oxford on a single night.⁹ Intelligence-led assessments conducted by Oxford City Council estimated a rough sleeping population of 104 in 2018. This assessment identified that while the majority of these rough sleepers were white UK nationals (63, 67%), over a quarter (27, 28%) were from outside the UK, with most of those (22) from the European Economic Area (EEA).^{10 11}

A local authority stakeholder described the EEA migrant rough sleeping population as having complex, overlapping needs and resulting difficulties engaging with services. Many EEA rough sleepers were unemployed and unable or unwilling to access supported or independent accommodation. In some cases, this was considered to be due to rough sleepers from the EEA not meeting the eligibility requirements for homelessness assistance or certain welfare benefits, as a result of restrictions due to their status in the UK or an inability to prove eligibility.¹² OCC commissioned the homelessness charity St Mungo’s in 2015 to deliver the Oxford Street Population Outreach Team (OxSPOT) to work with all rough sleepers, although there was no specific provision for EEA migrant rough sleepers.¹³

⁶ Ibid.

⁷ Data included in the CMF bid cited a 30% increase in complaints in 2016.

⁸ There was a rise of 38% in rough sleepers “seen bedded down” from 2015-16 Q4 (151) to 2016-17 Q2 (209) according to local authority data included in the CMF bid.

⁹ A total of 45 rough sleepers were counted and verified across Oxford in a 4 hour window from 00:00 - 04:00 hours on one night in November 2018. For more information, see: <https://3p50ut4bws5s2uzhmycc4t21-wpengine.netdna-ssl.com/wp-content/uploads/2019/02/Oxford-City-Council-rough-sleeper-count-report-Nov-2018.pdf>

¹⁰ The European Economic Area includes the 27 EU member states plus Iceland, Lichtenstein and Norway.

¹¹ Oxford City Council (2018) Council conducts annual rough sleeper street count, available at:

https://www.oxford.gov.uk/news/article/955/council_conducts_annual_rough_sleeper_street_count

¹² Eligibility for welfare benefits and housing for EEA nationals and their family members generally relates to the basis on which the EEA national is living in the UK, for example, as a worker or jobseeker. This is often referred to as having the ‘right to reside’ or being a ‘qualified person’ or ‘exercising a treaty right’. For more information, see: <http://www.nrpfnetwork.org.uk/information/Pages/eea-nationals.aspx>

¹³ St Mungo’s is a national charity providing direct support to prevent or respond to homelessness, increase understanding of homelessness and advocate for policy change related to homelessness. For more information, see: <https://www.mungos.org/>

The CMF-funded project

Oxford City Council received £409,319 of CMF funding in January 2018 for the Rogue Landlords and Rough Sleeping project. The project aimed to deliver two strands, which were intended to run in parallel but ended up running largely as separate projects. The Rogue Landlords strand ran from January 2018 – December 2019. Due to a delay in delivery, the Rough Sleeping strand started in July 2019 and at the time of the evaluation was planned to run until March 2021.

Rogue Landlords

The Rogue Landlords strand was led and managed by the Private Sector Safety Team (PSST) within OCC. CMF funding was used to employ three staff: an Environmental Health Officer, a Compliance Assistant and a Planning Enforcement Officer. Through these roles, the project intended to undertake targeted enforcement action to investigate suspected unlawful dwellings and take appropriate enforcement action where unlawful dwellings were identified; refer landlords who receive deposits and rent in cash to HM Revenue and Customs (HMRC); and remove illegal encampments from public land. This strand also aimed to tackle the impact of poor housing on the wider community by engaging with, and responding to, resident and community needs around local housing and the surrounding locality.

Rough Sleeping

The Rough Sleeping strand was externally commissioned by OCC to St Mungo's. CMF funding was used to provide:

- a single unit of short-term (28 days) “community-based pathway accommodation”¹⁴ to be used by EEA rough sleepers; and
- a new role for an “EEA Migrant Worker” to lead an outreach programme for the EEA rough sleeping population. The EEA Migrant Worker also aimed to support EEA rough sleepers to meet their needs, including to access accommodation.

Project objectives

Project objectives were identified following a review of project documentation and a consultation between the Ipsos MORI Relationship Manager and project staff. Following the consultation, a logic model was developed by Ipsos MORI, which was reviewed and agreed with project staff (see figure 1.1).¹⁵ The logic model outlines planned activities and outputs and how these relate to intended project outcomes and CMF fund-level outcomes.¹⁶ How the project aimed to contribute to CMF intermediate outcomes is outlined below (including longer-term outcomes where expected during the evaluation timeframe).

¹⁴ <https://www.oxfordhomelessmovement.org.uk/organisation/st-mungos>

¹⁵ A logic model is a diagrammatic representation of a project which depicts the various stages required in a project that are expected to lead to the desired outcomes. The logic model in turn is used to inform the evaluation approach; specifically, what needs to be measured to determine whether outcomes are being met, and how.

¹⁶ CMF fund-level outcomes are outlined in the Theory of Change in Appendix 1.

Through the planned project activities and outputs, the Rogue Landlords and Rough Sleeping project aimed to contribute towards the following **CMF fund-level intermediate outcome for the local authority**:

- **Increased insight into local migration patterns.**¹⁷ Both project strands aimed to contribute towards increasing insight for the local authority regarding the relationship between housing issues and migration. In relation to the Rough Sleeping strand, the project intended for the EEA Migrant Worker role to provide a richer understanding of the individual trajectory of migrant rough sleepers (such as how they came to be in Oxford and what happened to rough sleeping migrants once in Oxford). For the Rogue Landlords strand, this was expected to occur as an indirect result of enforcement activities, including gaining insight into the population inhabiting substandard accommodation and encampments.

The project also intended to contribute towards the following **CMF longer-term outcome for the local authority** within the project timeframe:

- **Increased revenue from enforcement of civil penalties (e.g. rogue landlords):** The Rogue Landlords strand aimed to contribute to this outcome by issuing enforcement notices to rogue landlords with substandard accommodation that may also have been occupied by migrants.

Linked to the above CMF outcomes, the project also aimed to contribute towards the following **project-level outcome for the local authority**:

- **Improved communication and knowledge of local problems and ensure resources are targeted appropriately:** Both project strands aimed to contribute to this outcome. The Rogue Landlords strand aimed to provide a clearer understanding of the nature and scale of the 'beds in sheds' issue and possible related exploitation of migrants by rogue landlords. In turn, this was hoped to help to inform decisions around resource allocation to tackle the issue. The Rough Sleeping strand aimed to improve identification, engagement and targeted support of migrant rough sleepers.

Project activities and outputs also aimed to contribute towards the following **CMF fund-level intermediate outcomes for recent migrant communities**:

- **Identification of housing issues (i.e. overcrowding, substandard provision):** Through funding three PSST posts, the Rogue Landlords strand aimed to identify and investigate suspected substandard accommodation and build intelligence of property conditions, rogue landlord activity and exploitation of vulnerable migrant populations.
- **Housing issues resolved (i.e. improved housing standards):** Linked to the above, the Rogue Landlords strand aimed to increase the enforcement of housing standards. This was enforced either informally via mediation or, where necessary, by issuing legal notices addressing issues with substandard accommodation and,

¹⁷ The component of this CMF-level outcome related to insight into 'community impact' is out of scope because it was both insufficiently clearly defined and overlapped with a range of more clearly defined outcomes.

where relevant, signposting occupants of substandard accommodation to alternative accommodation and support.

Linked to the above CMF outcomes, the project aimed to contribute towards the following **project-level outcomes for new migrant communities**:

- **Increased access to temporary accommodation for a limited period of time and support for return to country of origin:** The Rough Sleeping strand aimed to support and manage a small cohort of EEA migrant rough sleepers through funding a single unit of short-term (28 days) “community-based pathway accommodation” and using it as a means to help beneficiaries move towards independence and/or more sustainable accommodation. Support options also included help for beneficiaries to return to their country of origin.
- **Increased access to public services:** The Rough Sleeping strand aimed to contribute to this outcome through supporting beneficiaries to access benefits and public services, assisting beneficiaries in making applications for Universal Credit, and supporting beneficiaries to interact with and use public services to meet their individual needs.

Project activities and outputs also aimed to contribute towards the following CMF fund-level intermediate outcomes for **resident communities**:

- **Increased confidence that residents’ concerns are being listened to and addressed:** The Rogue Landlords strand aimed to improve the dialogue between the local authority and residents regarding their concerns through holding two annual meetings with members of Resident Groups and two annual member forums to solicit feedback from councillors. PSST staff also aimed to respond to complaints about rogue landlords, substandard accommodation, and anti-social behaviour related to rough sleepers or illegal encampments.

The project also aimed to contribute towards **project-level outcomes for resident communities**:

- **Fewer incidences of nuisance or antisocial behaviour due to noise, waste and vehicles together with the knowledge that properties in the vicinity are occupied by safe numbers (i.e. allocated numbers and not overcrowded) and that illegal activity is no longer occurring in the neighbourhood.** The Rogue Landlords strand aimed to achieve this outcome through the removal of illegal encampments from public land; ensuring properties had safe numbers of occupants; and addressing illegal activity through investigation of suspected substandard dwellings and undertaking enforcement action where appropriate.

Figure 1.1: Rogue Landlords and Rough Sleeping logic model

Context

Tackling poor housing conditions

- High levels of migration exerting pressure on housing and Private Rented Sector (PRS)
- Lettings of substandard dwellings, often to migrants who are reliant on the PRS and at risk of unscrupulous landlords
- Increase in complaints from residents about poor housing conditions and anti-social behaviour (i.e. accumulation of waste, noise), which is often attributed to migrant communities

Migrant rough sleepers

- Increase in rough sleeping: the number of EEA rough sleepers has remained constant, but many have been identified as long-term rough sleepers.
- Increase in complaints about migrant encampments on recreational land, avoided by residents due to unsanitary conditions
- There are various activities happening in Oxford around similar themes that the City Council is involved in, including:
 - Monthly headcounts of homeless people to gain better understanding of the homeless population.
 - Rough Sleeper Initiative funded project
 - Oxfordshire Homeless Trailblazer Programme launched in Oxford in May 2018

Issue

Tackling poor housing conditions

- OCC identified a need to increase capacity to address substandard housing (with 976 unlawful dwellings identified), which previous enforcement activities identified as often being occupied by more recent migrant communities
- Rise in complaints from residents considered an indication of potential rising tensions as issues are associated with migrants

Migrant rough sleepers

- Increase in rough sleeping: the number of EEA rough sleepers has remained constant, but many have been identified as long-term rough sleepers.
- Increase in complaints about migrant encampments on recreational land, avoided by residents due to unsanitary conditions

Risks and assumptions

- Funds are allocated as expected and dedicated members of staff are hired as planned
- 12 migrants from EEA per year can be identified and are willing to be supported to meet their needs
- Illegal encampments can be identified and removed
- As a result of enforcement action, resident perceptions are improved
- Outbuildings are found to be used as dwellings
- Resident groups and members elected to represent the resident associations see the unlawful dwellings as an issue and are able to comment on it.
- The support rough sleepers receive improves the migrants' access to services and helps with their well-being

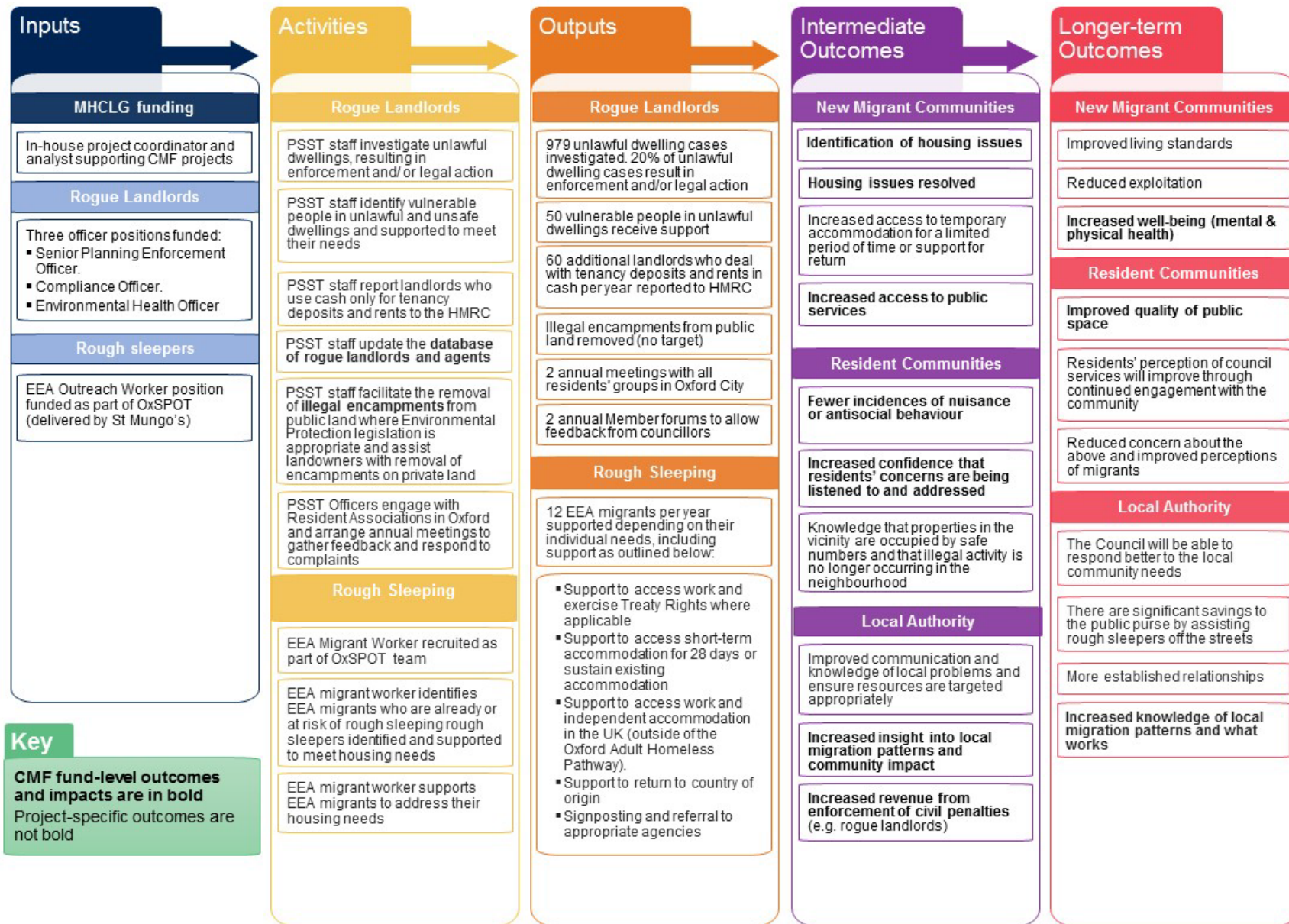
Impact

New Migrant Communities

- Accessible public services for all

Wider residents

- Improved community cohesion
- Effective service delivery to address local migration issues



2 Methodology

This section outlines the methodology for the project-level evaluation of the Rogue Landlords and Rough Sleeping project.

Overview of evaluation approach

A theory-based approach was taken for the evaluation, which focused on reviewing and testing the outputs and outcomes within the project's logic model.¹⁸ The suitability of different approaches was explored in an evaluation scoping phase. The possibility of implementing experimental evaluation designs, including Randomised Control Trials (RCTs), was explored and deemed not feasible at a fund level. This was due to the broad range of projects that have been funded across different regions and local contexts – which would have needed to have been integrated into the programme design from the outset. The feasibility of identifying local-level control groups was explored during individual project consultations and was not considered feasible, for the reasons outlined below:

- For the Rough Sleeper strand, it was not considered feasible to identify a control group of EEA rough sleepers in Oxford, as all were eligible for support through the project and the EEA Migrant Worker intended to establish contact with all individual within this cohort. Restricting the support for certain individuals was not considered ethical, given the expected high needs of this group, and the time-limited nature of the project. Furthermore, those unwilling to engage in the support were not considered to be representative of the overall cohort (as well as considered unlikely to respond to requests to take part in evaluation activities). It was also considered potentially unethical to involve individuals who were not being supported as they might have been living in challenging circumstances without support. Rough sleepers in locations outside of Oxford were not considered comparable, due to different support landscapes and local contexts.
- For the Rogue Landlords strand, activities focused on enforcement and included all properties identified as potentially unlawful prior to the evaluation activities. Therefore, identifying a control group of landlords who had been identified but not investigated (or residents in these areas) was not considered feasible. As residents were engaged by the project primarily through communications activities, it also wasn't considered possible within the scope of the evaluation to directly engage this group in evaluation activities.

For each project-level evaluation, project-level outcomes were “mapped” onto relevant CMF-fund level outcomes contained in the overall fund-level Theory of Change (see Appendix 2). The evaluation approach was designed in consultation with project staff, including the development of an evaluation framework. Primary data gathered was through

¹⁸ Theory-based approaches to evaluation use an explicit theory of change to draw conclusions about whether and how an intervention contributed to observed results. For more information, see: <https://www.canada.ca/en/treasury-board-secretariat/services/audit-evaluation/centre-excellence-evaluation/theory-based-approaches-evaluation-concepts-practices.html>

qualitative interviews, while the evaluation also drew on secondary and monitoring information collected by the project.

In order to assess value for money, each of the 14 projects were initially assessed through the lens of an 8-step model (outlined in Appendix 1). The assessment involved a review of the availability and suitability of data collected at each of the 14 project sites.

Consequently, each project was triaged to one of three methodological groupings:

1. **Cost benefit analysis (CBA):** Projects for which data on quantitative and monetizable outcomes was available met the higher threshold for Cost benefit analysis.
2. **Cost effectiveness analysis (CEA):** Where quantitative measures for outcome(s) existed, but no data (primary or secondary) was available to monetize the outcomes, cost effectiveness analysis was conducted.
3. **No feasibility for quantitative analysis:** Where there was no quantitative measure of outcomes available to the evaluation, neither cost benefit analysis nor cost effectiveness analysis could be conducted.

Two models were developed: the CBA model calculated costs relative to the monetizable benefits, while the CEA model calculated costs relative to the quantifiable outcomes achieved from each of the CMF interventions (without attempting to monetize these outcomes).

As there was no robust control (counterfactual) group against which to assess impact, artificial baselines were constructed. Where possible, input from project leads or secondary data was used to inform the assessment of the counterfactual. In the cases that this was not available, conservative estimates were made. Given the nature of the data used in the construction of the cost benefit and cost effectiveness models, the accuracy of results produced by the models should be interpreted with caution.¹⁹

Further information on the methodological approach, including the evaluation framework, is contained in Appendix 1. Appendix 2 outlines the CMF fund-level Theory of Change. Appendix 3 outlines the qualitative and quantitative research tools.

2.1.1 Qualitative data collection

Qualitative data was gathered through in-depth interviews with seven project staff, five stakeholders from both project strands and three beneficiaries (migrants) from the Rough Sleeping strand.

¹⁹ The Maryland scientific methods scale scores methods for counterfactuals construction on a scale of one to five (with five representing the most robust method). Due to the use of measures of additionally in the construction of the counterfactual, the approach taken for this analysis cannot be attributed a score. Therefore, the accuracy of results produced by the models should be interpreted with a high degree of caution. For more information, see: https://whatworksgrowth.org/public/files/Methodology/Quick_Scoring_Guide.pdf

Project staff facilitated the recruitment of participants for qualitative research activities to minimise the need to share personal data as part of the evaluation. Beneficiaries were recruited directly by Ipsos MORI researchers during project activities.

Monitoring data and secondary data sources

Monitoring data on relevant outputs was collected by the project and shared with Ipsos MORI. This included progress reports with supporting quantitative data both from the local authority and St Mungo's.

- For the Rogue Landlords strand this included information about number of inspections, accommodation use, actions taken as a result of investigation as well as relevant contextual information such as Housing Health Calculator estimates and anti-social behaviour data from the Community Safety team.
- For the Rough Sleeping strand this included basic demographic information of beneficiaries (age, gender, nationality), accommodation outcomes, ease and extent of engagement, access to public services or benefits, settled status, employment status and needs around health, substance misuse and language support.

Value for money assessment

Based on the available data on quantifiable and monetizable outcomes, the Rogue Landlords and Rough Sleeping project was selected for a CBA. Perceptions of project costs and benefits were also explored through qualitative consultations with staff and delivery partners. Where it was not possible to quantify monetizable outcomes, secondary data on potential monetizable benefits was considered.

Methodological strengths

- **Engagement with a traditionally hard to reach audience**, specifically EEA migrant rough sleepers which offered a valuable beneficiary perspective on the Rough Sleeper strand.
- **The range of monitoring and secondary data** shared by the delivery staff, including local administrative data and statistics, which provided further context and evidence on the achievement of CMF and project outcomes.
- **Strong communication between delivery staff and the evaluation team** allowed for a transparent and honest relationship which further strengthens the credibility of the evaluation itself.

Methodological limitations

- **Selection and response bias:** Participants either self-selected or suggested/referred other participants to take part in evaluation activities. Therefore, in both cases, participants may have been inclined to report positively on project activities and delivery. Some potential participants were not willing to engage with the research. Therefore, the evaluation was reliant on a relatively small number of accounts for the majority of feedback.

- **Beneficiary feedback:** There was no direct beneficiary feedback available for the Rogue Landlords strand. This was principally due to the delivery approach (where occupants were signposted to wider services and contact was not maintained) and limited resident feedback received in terms of complaints related to the issue (explored in more detail in Chapter 3).
- **Inferring contribution of the project towards outcomes:** With limited time series data and no control group or counterfactual, it is difficult to infer contribution of the project towards intended outcomes.
- **Data availability and disaggregation:** Some monitoring data related to the Rogue Landlords strand (e.g. instances of anti-social behaviour, estimates of the value of property improvements as a result of enforcement action) was available only at an Oxford-wide level. Consequently, the specific contribution of the Rogue Landlords strand could not be identified with precision.
- **Limited methodological triangulation:** The evaluation only employed interviews as a primary research method and otherwise relied on secondary data and monitoring data provided by the project.
- **Timing of the evaluation:** For the Rough Sleeper strand, the evaluation took part mid-way through delivery, which was planned to continue until 2021. As a result, findings must be interpreted accordingly.

Analysis and synthesis

Secondary data and monitoring data shared by the project was analysed to extract key findings related to achievement of outputs and outcomes.

Notes from each interview were systematically inputted into an analysis grid, allowing for more in-depth analysis of findings. There was one grid for each type of audience consulted. The grids follow the structure of the topic guide, enabling the identification of relevant quotes for each element of the outcomes and process evaluation. A thematic analysis approach was implemented in order to identify, analyse and interpret patterns of meaning (or "themes") within the qualitative data, which allowed the evaluation to explore similarities and differences in perceptions, views, experiences and behaviours. Once all data had been inputted, evidence for each outcome and key delivery theme was collated in a second analysis matrix to triangulate the evidence and assess its robustness.

Quotes in this report are verbatim and are used to illustrate and highlight key points and common themes. Quotes that contain personal information have been anonymised.

3 Key findings: delivery

Introduction

This section reports on the key findings from the evaluation in relation to how the Rogue Landlords and Rough Sleeping project was delivered. It begins with an assessment of progress made towards the intended outputs set out in the project logic model, followed by a discussion of the success factors and challenges that were found to have impacted on project delivery and the achievement of outputs.

Was the project delivered as intended?

Table 3.1 outlines the target outputs determined at the start of the evaluation process, the actual output at the point of assessment and an indication of whether it was achieved or not, based on a completion measure tool devised by Ipsos MORI.²⁰ Of the seven target outputs set for the Rogue Landlords strand, one was exceeded, two were achieved and two were partially achieved, while one was not achieved. All outputs in the Rough Sleeping strand were considered partially achieved, in a large part due to the fact that delivery was ongoing (until March 2021).

Table 3.1: Achievement of project outputs

Strand	Target output	Output achieved	Completion measure
Rogue Landlords	979 unlawful dwelling cases investigated	1263 inspections of alleged unlawful dwellings were carried out by the PSST	Exceeded
	20% of unlawful dwelling cases result in enforcement and/or legal action ²¹	8.7% (111) cases resulted in enforcement and/or legal action	Partially achieved
	50 vulnerable people in unlawful dwellings receive support	48 vulnerable people were identified in unlawful dwellings and either rehoused or signposted to further support (23 persons comprising 8 households rehoused or	Achieved

²⁰ The completion measure is a subjective assessment by Ipsos MORI based on the extent to which the project has achieved its intended outputs – scored as follows: inconclusive; not achieved; partially achieved; achieved; exceeded. See Appendix 1 for further details.

²¹ Enforcement action is understood as cases in which Housing Act enforcement notices / orders or Planning Enforcement Notices were issued (43 cases) as well as cases in which a notice had not been served but advisory action was noted and followed up with a landlord which resulted in safer property conditions (68 cases).

		signposted, and 25 people referred to the Willow Project).	
	60 additional landlords who deal with tenancy deposits and rents in cash per year reported (approx. 5 per month) to the HMRC	4 landlords receiving rent in cash were reported and 1 landlord was placed on the rogue landlord database While the target was not achieved, this was largely due to fewer than anticipated numbers of landlords being identified. The project stated that all identified landlords were referred to HMRC.	Not achieved
	Illegal encampments from public land removed (no target)	All 33 encampments that were the subject of public complaints to the local authority were removed through enforcement action.	Achieved ²²
	2 annual meetings with all resident groups in Oxford City	There were no annual meetings with resident groups. Instead, a survey consultation exercise was conducted with 14 residents' associations in March and April 2019	Not achieved
	2 annual member forums held to allow feedback from councillors	1 member forum took place in 2018	Partially achieved
Rough Sleeping	12 migrants from EEA supported to meet their needs per year (full breakdown below)	Overall, 5 EEA migrants had been supported to meet their needs in the way envisaged by the bid: <ul style="list-style-type: none"> • 2 through accessing short term accommodation (over 130 days); • 2 through support to return to their country of origin. 1 was reconnected but subsequently returned to the UK; and 	Partially achieved (ongoing)

²² While there was no target on the number of illegal encampments the project planned to remove, as staff reported that all encampments had been removed, this output is assessed as achieved.

		<ul style="list-style-type: none"> • 1 through accessing work and independent accommodation <p>In addition, 34 project beneficiaries were supported in other ways by the end of the second quarter of the project.</p> <p>Due to the varied needs of the target group and individualised nature of the support provided through the project, as well as the fact that delivery was intended to continue until March 2021, this outcome has been assessed as partially achieved</p>	
	Support to access short-term accommodation for 28 days or sustained existing accommodation (no target)	2 beneficiaries had accessed the short-term accommodation unit over 130 days	
	Support to successfully return to country of origin (no target)	2 beneficiaries were successfully supported to return to their country of origin and one was reconnected (but subsequently returned to the UK)	
	Support to access work and independent accommodation in the UK (outside of the Oxford Adult Homeless Pathway) (no target)	5 migrant rough sleepers accessed work and 1 accessed independent accommodation	
	Signposting and referrals to appropriate agencies (no target)	<ul style="list-style-type: none"> • 7 signposting and referrals to employment support • 17 signposting and referrals to accommodation support • 23 beneficiaries referred for support to apply for Settled Status 	

		<ul style="list-style-type: none"> • 7 beneficiaries supported to access benefits • 11 beneficiaries supported with health needs • 2 beneficiaries signposted to substance abuse support • At least 7 beneficiaries signposted to English language provision 	
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What worked in delivering the project?

Two key elements that were found to facilitate project delivery for the Rogue Landlords strand were:

- (1) focussing dedicated resource on a single issue; and
- (2) partnership working supporting improved targeting and referrals.

(1) Dedicated resource focused on a single issue

Focussing dedicated resources on addressing the issue of substandard housing (through investigation and enforcement action against 'beds in sheds' and illegal encampments) allowed the PSST to significantly exceed the original output target of investigating dwellings. This was despite a period of seven months (October 2018 – April 2019) in which there were no inspections due to the absence of an Environmental Health Officer (explored further in section 3.4 below).

Staff and stakeholders reported that while the PSST already had a tried and tested approach to investigation and enforcement, dedicated resources (an Environmental Health Officer, Compliance Assistant and Planning Enforcement officer) allowed the PSST to take a more "proactive" approach to address an identified issue. This increased the capacity of the team to undertake "front end work", including visiting potential unlawful dwellings and issuing notices to occupiers and owners to visit the property to carry out an inspection. Once the initial list of 979 suspected unlawful dwellings had been exhausted, the PSST identified properties using Google Maps, resident complaints, wider referrals and site reconnaissance. This led to a greater number of inspections and subsequent enforcement action.

Project staff reported that the focussed resource of the funded staff members ensured the wider team had a more robust understanding of how to address the issue of rogue landlords most effectively. For example, staff described how they had the resources to reflect on and amend the approach to enforcement in the second year of the project. This included conducting fewer visits, allowing additional time for recording and following-up

with identified properties. Staff reported that this had improved the quality of reporting and subsequent intelligence on the issue.

Staff also felt that the comprehensive approach to enforcement action had a potential preventative effect in deterring other rogue landlords, by raising awareness among landlords that enforcement action would be taken.

“Bringing in the additional resources to run the [project] has allowed us to do a lot more [pro-active work]...and that’s borne out by the amount of enforcement we’ve had to do... Now at the end of the two year project the message is very clear... [rogue landlords] will be found out so in that sense it’s enabled us to concentrate our efforts and prevent something from spiralling out of control.” Delivery staff, interview

(2) Partnership working

Staff highlighted how partnership working emerged and improved as the project progressed. Project stakeholders and staff reported that, as a result of the project, the PSST developed a broad range of specialist contacts for sharing information, conducting joint visits and supporting vulnerable residents, all of which helped the team work more effectively. Key relationships were developed with the UK Visas and Immigration’s (UKVI) Immigration Enforcement team and the Willow Project,²³ with whom the PSST have conducted joint operations.

The PSST started to work more closely with the UKVI from August 2018, and from around July 2019 there was a substantial increase in the amount of enforcement activity. Project staff attributed this increase to the availability of better data and a change of approach in targeting suspected substandard properties. As a result of collaboration, the PSST benefited from UKVI access to Department of Work and Pensions (DWP) data, resulting in more effective targeting and a better ‘hit rate’ in terms of identifying occupied properties, especially those occupied by illegal or vulnerable migrants. Joint working with the UKVI also provided the PSST with an additional, more direct referral route for undocumented migrants. The change in targeting approach (which placed greater emphasis on reconnaissance and background research into properties prior to investigation) was the result both of the PSST adapting the approach and greater capacity following the extended absence of an Environmental Health Officer.

Project staff also highlighted how training received through working in partnership with the Willow Project improved their understanding of, and ability to recognise, exploitation and issues including Modern Slavery and human trafficking. The PSST and the Willow Project also conducted joint investigations of properties with suspected exploited occupants and the relationship provided an additional point of referral and support for vulnerable people. During the project, the PSST referred 25 victims of exploitation to the Willow Project to receive tailored support.

²³ The Willow Project is part of ‘Victims First’ and is one of a number of services for victims commissioned by the PCC for Thames Valley. It will be delivered by Thames Valley Partnership under a two-year contract with the Office of the Police and Crime Commissioner.

Three key elements were found to facilitate project delivery for the Rough Sleeping strand:

- (1) leveraging existing delivery infrastructure and expertise within the city;
- (2) identification and recruitment of skilled project staff with the ability to engage effectively with, EEA migrant rough sleepers; and
- (3) developing and sustaining partnerships to respond to the needs of beneficiaries.

(1) Leveraging existing delivery infrastructure and expertise

The Rough Sleeping strand may be understood as an extension and augmentation of the service delivery of St Mungo's within Oxford, which in turn reflects existing relationships between St Mungo's and Oxford City Council. Rough sleepers eligible for the project were initially identified through the Oxford Combined Homelessness and Information Network (CHAIN) database, managed by St Mungo's. New arrivals were often assessed and referred to the project by the Oxford Street Population Outreach Team (OXSPOT),²⁴ delivered by St Mungo's and commissioned by Oxford City Council. Project staff also reported that St Mungo's were able to provide a variety of support to the project including:

- working with Routes Home, a division of St Mungo's which works specifically on reconnecting EEA migrants to their home countries; and
- arranging and providing relevant training. This included 'EEA benefit training' and 'general benefit training', which improved project workers' knowledge of the benefits system for this client group, and, consequently, their ability to support beneficiaries to access benefits; and 'settled status training' and an Office of the Immigration Services Commissioner Level 1 qualification training, which enabled the EEA Migrant Worker to assist beneficiaries in the process of applying for Settled Status (rather than having to refer them to another organisation).

(2) Skilled project staff

Staff and stakeholders reported that the EEA Migrant Worker role provided dedicated resource to support a high-need client population. Both project stakeholders and beneficiaries reported that the post-holder was particularly capable and effective in engaging EEA migrant rough sleepers. In terms of capabilities, the post-holder spoke multiple relevant languages relevant to the beneficiary group. They also had significant experience of complex casework involving substance misuse as well as postgraduate qualifications in 'Addiction prevention and Treatment'. As half the client group was Polish and had complex needs, including substance misuse issues, project staff reported that the post-holder was well-placed to engage beneficiaries and address their needs. Project staff highlighted the need to build trust among EEA rough sleepers, due to widely held beliefs among this group that their needs had been previously been overlooked in support provision in the city (a view that was also reflected in beneficiary interviews).

²⁴ <https://liveswell.oxfordshire.gov.uk/Services/1811/Oxford-Street-Population>

"[The EEA Migrant Worker] is [the] perfect person... Some of my friends, they are surprised, they are so happy [with the support of the EEA Migrant Worker] ...few key workers before... they tried to do something, but they did nothing." Project beneficiary, in-depth interview

Project staff reported that beneficiaries demonstrated "increasingly high levels of engagement" as the project progressed, reflected in anecdotal reports around improved attendance of EEA rough sleepers at temporary accommodation and an increase in beneficiaries informing the EEA Migrant Worker when they were leaving Oxford temporarily. Another indicator of engagement was the number of applications for Universal Credit (UC) to date. Staff reported that the target beneficiary group were typically resistant to apply for benefits, but one beneficiary had successfully applied for UC and seven were in the process of applying or awaiting a decision. Project staff saw this as "excellent progress" and attributed it to the work of the EEA Migrant Worker to educate beneficiaries and shift the "negative perception" around claiming benefits.

(3) Developing and sustaining partnerships

Project staff on the Rough Sleeping strand initiated and developed relationships with various organisations and agencies which they felt contributed to effective delivery. These included Crisis, the Oxford Polish Association, Asylum Welcome, a medical centre, a local night shelter and a local employment agency.

The relationship with Crisis most significantly provided additional support for beneficiaries to transition out of short-term "pathway accommodation", through helping to identify suitable accommodation, negotiate with landlords and, crucially, providing the first month's rent for beneficiaries to live in independent accommodation. Crisis was also able to support beneficiaries with their wider needs, beyond the scope of the Rough Sleeping strand.²⁵ Staff reported that many beneficiaries had not been aware that this support was available. Although staff reported that they had not managed to support as many beneficiaries to move on from temporary accommodation as initially expected during their first year, they felt that without this support the transition period for beneficiaries into accommodation would likely have been significantly longer.

The relationship with the Oxford Polish Association facilitated the delivery of weekly English lessons for Polish beneficiaries,²⁶ ten of whom were identified as having limited English that negatively impacted their employment opportunities. The lessons were delivered by an English teacher from the Oxford Polish school, in response to feedback from beneficiaries that English language lessons delivered by Crisis were too demanding (partly because the teacher was unable to speak Polish). The relationship with Europa Welcome (a division of Asylum Welcome specifically designed to help vulnerable people with Settled Status applications) supported twenty-three beneficiaries with their applications for Settled Status. As advice and support regarding Settled Status is classed as migration advice and can therefore be only provided by OISC qualified and registered

²⁵ Crisis was able to provide support for project beneficiaries in the following ways: i) provision of clothing and prescription glasses, ii) support with acquisition of items necessary for employment, such as clothing, equipment and safety boots; iii) a level 1 induction "kitchen course" in the Crisis Café, specifically for two project clients who would not have had the confidence to take part in the larger group setting in which the course is typically delivered and; iv) a breakfast club for homeless people twice a week that is now regularly attended by EEA migrants. The club also provided an opportunity to engage with clients and was regularly attended by the MRS project worker.

²⁶ 18/34 of the current caseload for the Rough Sleepers project.

professionals, staff identified that it was essential for beneficiaries to be referred to an appropriate agency.

Staff also highlighted how a relationship with a local GP surgery that accepted people who lacked a fixed address enabled beneficiaries who weren't previously registered with a GP to access healthcare. Project staff also reported that their relationship with a local employment agency sped up the identification of employment opportunities for some project beneficiaries who were referred to the agency by project staff.

"The recent client who got employed [through the employment agency], I was able to make an appointment in 15 minutes and they offered him a job in half an hour... Because we got that relationship they are providing speedy access which maybe if clients just popped in by themselves it's difficult to say whether they would say that right away." Project staff, interview

What were the challenges to delivering the project?

There were two main challenges to delivery for the Rogue Landlords strand:

- (1) Misdiagnosis of the issue of 'beds in sheds'; and
- (2) Effective engagement of occupants of substandard dwellings.

(1) Misdiagnosis of the issue of 'beds in sheds'

The expectation at the outset of the project, derived from prior data and experience, was that the number of substandard occupied dwellings would be higher than it was found to be. From 2013-2015 (prior to the CMF funded project), 646 unlawful dwellings were investigated and statutory action was taken for 128 (20%). This trend was anticipated to continue, however only 8.7% of dwellings investigated resulted in enforcement and/ or legal action during the project.

In addition, project staff described how the project rationale was in part based on an increase in complaints from residents regarding substandard dwellings and rogue landlords, which research conducted by OCC had indicated were often occupied by migrants. Stakeholders reported that this data may have been misattributed to the issue of rogue landlords and substandard occupied dwellings, or on investigation found to be unfounded. For example, staff highlighted how resident complaints about overcrowding (made due to seeing high numbers of people arriving at and leaving a property) may on investigation by PSST staff be discovered to be due to legitimate reasons. Project staff also highlighted how resident complaints often did not contain sufficient information to directly attribute to the issue of rogue landlords or 'beds in sheds'. Nonetheless, project staff highlighted that the project had enabled them to investigate resident complaints more effectively.

"We didn't have the data around complaints to begin with, it was too vague when it went into the bid, we didn't have the data extraction mechanisms to show which complaints related to 'beds in sheds.'" Project stakeholder, interview

While it was widely reported by staff and stakeholders that the issue of substandard occupied dwellings was likely to be lower than anticipated, based on the low number

revealed through investigations, project staff also highlighted barriers to identifying these properties. Project staff reported that the legal requirement to provide landlords and occupants with twenty-four hours' notice in writing about an inspection may have resulted in occupants of unlawful dwellings temporarily moving out (or being moved out by rogue landlords) prior to inspection. The extent to which this was the case is unclear, although if this practice was widespread then the scale of the issue of rogue landlords may be greater than reflected in the data from inspection reports. Staff highlighted that where there was evidence suggesting unlawful occupancy, a property would be noted for further investigation.

Furthermore, staff noted instances of dwellings being used as short-term rentals (such as through Airbnb), which staff suggested may indicate landlords changing the use of properties as this was a more lucrative source of income, potentially reducing the prevalence of substandard occupied dwellings in the city.

(2) Challenges engaging occupants

Project staff noted challenges engaging occupants of substandard dwellings. Project staff reported that there was often a reluctance among potentially vulnerable people to engage with the PSST. Staff attributed this to a fear of eviction, a desire to avoid contact with the authorities, language barriers and the fact that occupants were under no obligation to engage with the PSST or provide information about themselves. Furthermore, engaging with occupants of investigated properties primarily took the form of signposting and referral and there was no obligation on the part of occupants to take up this support. This was mitigated to some extent through joint working with partners such as the Willow Project and staff reported that all identified occupants of encampments and were provided with written information and signposted to the outreach team.

Project staff suggested that this might have been ameliorated further by a closer working relationship with the Rough Sleeping strand, had the two strands overlapped more substantially.

"We have turned up at a number of properties... and people have just gone... The fact that people are reluctant to engage with us has had [a] limiting impact on what we do" Project staff, interview

Identifying and engaging occupants was also made more difficult by the fact that some occupants may be moved from the property or leave following the issue of a notice to investigate and before the inspection (as outlined above).

There were two closely related challenges to delivery for the Rough Sleepers strand:

- (1) the short timeframe afforded by the 28-day 'pathway' model; and
- (2) complexity of the EEA migrant rough sleeper group, notably around alcohol misuse and attitudes to claiming benefits.

(1) The 28-day pathway model

Project staff indicated that the 28-day pathway model had been less successful than envisaged, in part due to target beneficiaries not having access to public services or benefits. This was due to beneficiaries either having No Recourse to Public Funds as a result of their immigration status, or a lack of evidence to support their right to access public funds. This meant that the only suitable pathway to accommodation for beneficiaries was in the Private Rented Sector (PRS). Project staff also reported that many beneficiaries were reluctant to claim benefits, while beneficiaries indicated that non-receipt of benefits was a point of pride and they were more focused on gaining employment. Project staff attempted to address this challenge through explaining the benefit system and encouraging beneficiaries to apply.

"I don't want to make any benefits while I'm working...I don't want any benefits" Project beneficiary, depth-interview

"[As long as] I have two legs and two hands I will never go on benefits." Project beneficiary, depth-interview

Project staff highlighted additional factors that made it more difficult to identify suitable PRS properties for project beneficiaries, including:

- The scarcity of available PRS accommodation in Oxford;
- The common request from PRS landlords for references from prospective tenants, which many beneficiaries could not provide due to being street homeless; and
- Cautiousness among PRS landlords about letting a property to individuals supported by homeless services.

Additionally, project staff reported that access to the PRS typically required prospective tenants to be in full-time employment, to demonstrate employment consistency and to have enough money to provide a deposit and the first month's rent, which were all barriers to rough sleeping beneficiaries.

Mitigation of these barriers required considerable support from the Crisis Private Renting team. Crisis staff liaised with landlords, helped to arrange viewings, negotiated deposits and provided the first month's rent. Despite this support, both occupants of the short-term accommodation stayed twice as long as the intended 28 days (over 60 days). Project staff suggested that if the project was to be repeated or extended, funding for deposits would be important to supporting this beneficiary group into accommodation.

"The project is really helpful... it's really difficult to stand up from the street without accommodation, but one month is not enough time" Project beneficiary, depth interview

Due to the challenges encountered by the project in transitioning beneficiaries within the target timeframe, commissioners subsequently agreed to greater flexibility around length of stay. This was due to the barriers outlined above, as well as the complex needs of this group, including mental and physical health needs and, often, substance misuse issues. According to project staff, a more realistic timeframe for this population would be two to three months. Project staff also reported that a shorter timeframe would be contingent on Crisis continuing to provide the first month's rent and deposit (currently under review due

to a relapse suffered by the first beneficiary of this service while in independent accommodation).²⁷

“In a perfect world, thirty days would be achievable... Because of that cooperation with Crisis...only because of that I think it’s possible... If not for Crisis [beneficiaries] would stay [in short-term accommodation] for probably three months...” Project staff, interview

(2) Multiple and complex needs of EEA migrant rough sleepers

Closely related to the barrier above, the project encountered barriers to delivery due to the prevalence of complex needs among the target beneficiary population. Project staff reported that the majority of the target rough sleeping population had substance misuse problems, mainly around alcohol misuse. A project summary report from January 2020 identified that around 20 beneficiaries (59%) had substance misuse issues affecting their health, employment and housing options. Project staff reported that beneficiaries were typically reluctant to address or recognise this as a problem, tending to see drinking as a consequence of being homeless rather than a contributing factor. Further, alcohol misuse was reported as being responsible for some beneficiaries’ inability to sustain employment and independent accommodation in the longer-term.

“When I started the project I thought that very quickly I will fix the problem and clients will go back to work. But for a lot of them it won’t be that straightforward, it will be two steps forward and one step back. But there is positive movement in a lot of the clients... It will just take much longer than is expected... and sometimes people relapse... it’s just normal for them.” Project staff, interview

Project staff attempted to address this challenge through working closely with local organisations providing targeted support, including Polish Alcoholics Anonymous and Turning Point.²⁸ Project staff reported that developing a relationship with a specific Turning Point worker had facilitated referrals for support and two beneficiaries had registered and attended several sessions. However, beneficiaries were generally unable (due to language barriers) or reluctant (because they did not recognise or acknowledge their drinking as a problem) to engage with Turning Point. Delivery staff also reported challenges making appointments with Turning Point due to their large caseloads and limited staff availability. Furthermore, some beneficiaries were not eligible for residential detox accommodation due to having No Recourse to Public Funds. Project staff reported identifying one residential detox unit that would accept people with who were not in receipt of benefits, but that it did not accept people with low levels of English language.

“Outputs don’t take into account the entrenched nature of many of the clients we work with – some have been sleeping rough for five to six years” Project staff, interview

The recruitment of suitable staff was a delivery challenge common to both the Rogue Landlords and Rough Sleeping strands.

²⁷ Crisis expect clients to demonstrate prolonged periods of sobriety before providing financial support. This episode may therefore impact negatively on future candidate clients given that a majority have or had alcohol-related issues.

²⁸ <http://wellbeing.turning-point.co.uk/oxfordshire/hubs/oxford-hub/>

(1) Recruitment of suitable staff

On the Rogue Landlords strand, The PSST was initially unable to identify and recruit an Environmental Health Officer (EHO) on a fixed term contract for the Rogue Landlords project, instead employing an EHO via an agency on a temporary contract. The temporary contract finished in October 2018 and an agency replacement was not recruited again until April 2019. As a result, the PSST experienced a period of seven months (October 2018 – April 2019) during which no inspections took place. Had this absence not occurred it is likely that more investigations would have taken place and conceivable that more enforcement activity might have taken place. Project staff attributed this recruitment difficulty to a reluctance on behalf of potential employees to take up fixed-term contracts and the scarcity of suitably qualified candidates.

Project staff on the Rough Sleeping strand reported that recruiting a skilled and capable EEA migrant worker, while ultimately successful, was time-consuming and contributed to delays to delivery. Again, project stakeholders and staff attributed the challenge with the recruitment process to a reluctance on behalf of potential employees to take up fixed-term contracts and the scarcity of suitably qualified candidates to a “niche” and specialist role. The delay in recruiting staff also meant that there was less opportunity for the two project strands to operate in parallel, which was the original intention. This limited the potential for joint working between the two strands, most obviously in terms of the PSST being able to effectively engage migrant groups as part of investigative work or encampment removal.

4 Key findings: Outcomes

This section reports on the key findings from the evaluation in relation to progress made by the Rogue Landlords and Rough Sleeping project towards each of its intended outcomes. It begins with a description of how the project intended to contribute towards the outcomes, followed by an assessment of progress made based on the available evidence. This is followed by discussion of the factors that were found to have contributed to the achievement of project outcomes.

Progress towards intended outcomes

CMF fund-level local authority outcomes

Intermediate outcome 1: Increased insight into local migration patterns and community impact

The Rogue Landlords strand aimed to generate a better understanding of the relationship between housing issues (including substandard dwellings and encampments) and local migrant populations through investigation and enforcement activities. Specifically, the investigations aimed to contribute to a clearer understanding of the nature and scale of the ‘beds in sheds’ issue and possible related exploitation of migrants by rogue landlords. In turn, this was intended to inform decisions around resource allocation to tackle the issue. The Rough Sleeping strand intended to further understanding of the needs, motivations and trajectory of EEA rough sleepers in the city, improve the identification of migrant rough sleepers and the support provided to them. This outcome also closely relates to the project-level outcome *“Improved communication and knowledge of local problems and ensure resources are targeted appropriately”*.

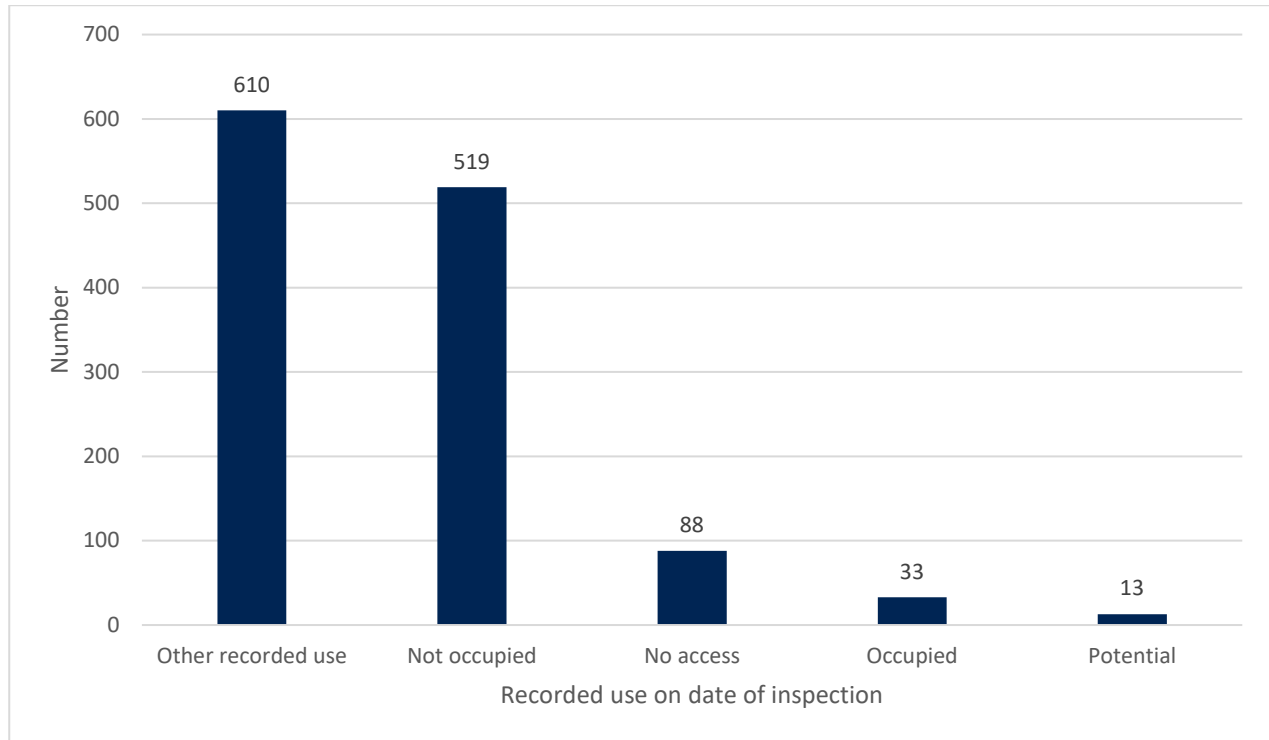
In relation to the Rogue Landlords strand, project stakeholders and staff reported that while the investigation and enforcement activities had provided useful insights into property conditions, types and uses (explored more in intermediate outcome 2 below) this had not generated substantial insights into migration patterns.

“It’s massively improved our knowledge of the properties but in terms of the migration patterns... it hasn’t really.” Project stakeholder, interview

Nonetheless, project staff reported that investigations of suspected substandard occupied dwellings provided a clearer idea of the scale and extent of the issue, as well as what suspected substandard accommodation was used for, which was recorded by staff (see Figure 4.2 below). As above, staff suggested that the scale of the issue was likely to be more limited than anticipated, with only 2.6% recorded as occupied and used as dwellings. However, where buildings were categorised as being used for purposes other than for occupation (such as gyms or storage), or “unoccupied”, project staff indicated that other issues may be apparent, such as non-compliance with building regulations, which would be referred to the appropriate team. Staff also expressed some uncertainty about the issue; specifically, that although 519 properties were unoccupied when investigated, as outlined in Chapter 3 it was conceivable that some proportion of these properties were being used as substandard accommodation,

but that tenants were removed from the property prior to inspection. This uncertainty was also relevant to the 88 inaccessible properties. Project staff indicated that any premises where there is potential for re-occupation would continue to be monitored.

Figure 4.1: Use of suspected unlawful properties investigated²⁹



Base: 1263

Project stakeholders and staff reported that this intelligence enabled the local authority and councillors to communicate more effectively with the public regarding the issue, and that the data helped to support decisions about where and how to focus resources in the future. Project staff also speculated that the ability to focus on the issue would have a preventative effect and stop the issue becoming more widespread (and therefore taking up additional resources). Staff felt that rogue landlords were likely to be more aware that enforcement action would be taken, and therefore less inclined to place vulnerable people in substandard accommodation.

"[Without the project] we wouldn't have had that knowledge [about] how many potential illegal beds and sheds [sic] were out there... Now can be sure that either they're incredibly well hidden or we've investigated them." Project stakeholder, interview

"This is intelligence that we can use and go back [to]... We have the addresses of those 519 [investigated properties]... Obviously those properties are ones we will keep a specific eye on so the intelligence we've got is very useful...in terms of beds in sheds it's not something that

²⁹ 'Occupied' refers to suspected unlawful properties being used as 'beds in sheds'; 'Not occupied' refers to suspected unlawful dwellings that were not occupied at the time of investigation; 'No access' indicates that the PSST could not gain access to the suspected unlawful dwelling at the time of investigation. 'Other recorded use' indicates that the suspected unlawful dwelling was not occupied and was being used for another purpose including as a 'Gym', 'Hobby room', 'Office', 'Sauna', 'School', 'Storage', 'Summerhouse' or 'Workshop.' A full breakdown is provided in the Appendix 1.

now we perceive to be such a big problem and it will be dealt with on a less focussed basis.”
Project staff, interview

On the Rough Sleeping strand, staff regularly collected demographic information (including age, gender and nationality) about EEA migrant rough sleepers that captured changes in this population in Oxford.³⁰ Staff also collected data on reasons for homelessness and individual beneficiary needs, which provided additional insight into how and why migrant rough sleepers found themselves in Oxford. Staff reported that this helped to identify practical solutions, especially in the context of the UK leaving the European Union and the implications for EEA rough sleepers. Specifically, there was greater insight into the make-up of the population and their needs including: basic demographic information (age, gender, nationality); whether or not they had settled status; their employment status; their accommodation status; how to engage with them more effectively through a specialist role; their level of access to public services and benefits, and their wider needs around health, substance misuse and language support.

This information was updated regularly on the council's OxTHINK database with support plans reviewed and updated on a monthly basis. It was also communicated regularly to wider project stakeholders, including the OCC Rough Sleeping team. Project stakeholders reported that the greater engagement with, and richer data about, EEA migrant rough sleepers provided a better understanding of how this population came to be rough sleeping and how better to work towards improving their situation, both now and in the future (e.g. through focusing on access to employment).

“The insights that are valuable with the EEA strand specifically [are] about how to engage with that particular group and the insights and knowledge it gives us about the needs of that particular group... it's all very much related to [unemployment] and lack of [a] safety net so getting back into work is key.” Project stakeholder, interview

“It absolutely will increase our knowledge because we already have that fine-grained detail... all the countries of origin... what their needs are, that close attention...especially because of all the changes around EU settlement...[it] gives quite a lot of detail around EU settlement because that's in a massive state of flux...so that sort of intelligence...is really brilliant and vital” Project stakeholder, interview

“We can see from the data that the reason they became homeless is because they lost their jobs and then some of them not entitled to benefits so it's all very much related to work and lack of safety net so getting back into work is key.” Project staff, interview

The above evidence suggests that both strands had generated insight: the Rough Sleeping strand regarding the EEA Rough Sleeping population; and the Rogue Landlords strand regarding substandard housing (although this did not result in as much insight regarding migration patterns, beyond the scale of substandard occupied dwellings being less than anticipated).

Longer-term outcome 1: Increased revenue from enforcement of civil penalties

The Rogue Landlords strand aimed to increase revenue through issuing enforcement notices to rogue landlords who provided substandard accommodation. The PSST issued two civil penalties resulting in fines totalling £6,500.

³⁰ In the first quarter of the project, 23 EEA rough sleeping beneficiaries were identified and a further 11 during the second quarter.

CMF fund-level migrant outcomes

Intermediate outcome 2: Identification of housing issues (i.e. overcrowding, substandard provision); and
Intermediate outcome 3: Housing issues resolved (i.e. improved housing standards)

The Rogue Landlords strand aimed to identify housing issues through investigating suspected substandard accommodation and reported illegal encampments. It sought to resolve issues through the enforcement of housing standards (either informally via mediation or, where necessary, by issuing legal notices) and signposting occupants of substandard accommodation to wider support organisations in order to address their housing and wider needs. The Rough Sleeping strand aimed to use the short-term 'pathway' accommodation and support from the EEA Migrant Worker to help beneficiaries move towards independence and/ or more sustainable accommodation and support options (such as return to their country of origin). In this way, the project also aimed to contribute towards the project-level outcome *"increased access to temporary accommodation for a limited period of time or support for return to their country of origin"*.

On the Rogue Landlords strand, the PSST undertook a range of enforcement activity that identified and resolved housing issues, including: serving Housing Act Enforcement Notices/Orders on owners of both unlawful and lawful dwellings, serving a Planning Enforcement Notice on an owner of an unlawful dwelling, and taking informal action against domestic dwellings resulting in property improvements (see Table 4.2 below). Project stakeholders and staff reported that enforcement activity resulted in property improvements which resulted in safer, legal property conditions for occupants. Civil penalties for non-compliance with enforcement notices resulted in fines of £6,500.

Table 4.1: Enforcement activity undertaken through the Rogue Landlord strand

Enforcement Activity	Quantity
Housing Act Enforcement Notices/Orders served on owners of unlawful dwellings	32
Housing Act Enforcement Notices/Orders served on owners of dwellings	10
Planning Enforcement Notice served on owner of unlawful dwelling	1
Informal action taken against domestic dwellings (where a notice has not been served but advisory action is provided and followed up with landlord)	68

Housing issues were also resolved in the sense that substandard properties were improved after enforcement activities were undertaken by PSST staff³¹ - with staff following up to check that the required action had been taken (for example, fire alarms installed). However, the extent to which housing issues were resolved for occupants of substandard dwellings or those in illegal homeless encampments was less clear. Project

³¹ Enforcement action was defined by the project as cases in which Housing Act enforcement notices / orders or Planning Enforcement Notices were issued (43 cases) as well as cases in which a notice had not been served but advisory action was noted and followed up with a landlord which resulted in safer property conditions (68 cases).

staff and monitoring information suggested that the 23 migrants identified as part of property investigation and all those moved on from encampments were provided with appropriate signposting and referral to wider support organisations. However, there was no data available for subsequent resolution, in the sense of these groups finding alternative, or better quality, accommodation. Project staff considered conditions to have been improved in all inspected properties, however due to many occupants subsequently leaving the property and not providing a forwarding address, it was not possible to follow up with individuals. Staff considered this to be a consequence of a highly mobile population.

There was no evidence at the time of the evaluation that the Rough Sleeper strand had contributed to resolving housing issues via the ‘pathway’ accommodation, although project delivery planned to continue beyond the evaluation timeframe (until March 2021). At the end of the second quarter of the project (December 2019) the short-term pathway accommodation had provided temporary occupation for two beneficiaries. The first was had subsequently been evicted from the independent accommodation they moved to after ‘pathway’ accommodation due to an alcohol-related relapse, and was staying in alternative accommodation. The second had not yet moved out of the pathway accommodation. Staff considered this in part due to challenges faced by EEA rough sleepers, which made the 28-day pathway unsuitable (explored in more detail in Chapter 3).

Table 4.2: Stays in short-term pathway accommodation

Client	Moved in date	Moved out date	Stayed (days)	Vacant (days)
1	23/08/2019	25/10/2019	63	2
2	28/10/2019	NA	65	NA

Project staff reported that all beneficiaries had been informed about the availability of support to return to their country of origin. However, staff described how most beneficiaries considered the UK to be their home, often after living in the country for a number of years, and were not interested in returning to their country of nationality. For example, some beneficiaries had lost contact with their families abroad, or their families were living in the UK. In these cases, project staff considered reconnection to be unsuitable. At the end of the second quarter of the project, three beneficiaries had been reconnected, all of whom had lived in the UK for less than one year. One beneficiary subsequently returned to the UK after becoming homeless; project staff reported this was because they considered support for homeless people in Oxford to be more effective than the support available in their home country.

Furthermore, it was widely reported (by staff, stakeholders and beneficiaries) that the role of the EEA Migrant Worker had helped identify the different barriers EEA rough sleepers faced to accessing housing, including non-receipt of benefits, inability to provide evidence required to access private housing or access services, lack of employment or insecure employment, and substance misuse issues (explored in more detail in Chapter 3). There is evidence that the EEA Migrant Worker role helped beneficiaries access support for wider barriers to housing, the first step towards addressing housing issues.

Available evidence indicates that the Rogue Landlords strand had resulted in improvements to housing conditions, but the evidence is less clear on whether this resulted in resolution of housing issues for occupants of substandard dwellings and migrant encampments. In relation to the Rough Sleeping strand, while the available evidence suggests the project had not contributed substantially to resolving housing issues – particularly keeping to the original 28-day target for pathway accommodation– the EEA Migrant Worker role had contributed to identifying the issues beneficiaries faced in accessing housing and was working to overcome these with beneficiaries. Therefore, it was too early in project delivery to dismiss eventual contribution to this outcome. The evidence also indicates that the Rough Sleeping strand was contributing towards supporting beneficiaries to return to their country of origin, where appropriate.

Intermediate outcome 4: Increased access to public services

The Rough Sleeping strand aimed to contribute to increasing access to public services through establishing beneficiaries' eligibility and supporting them to access benefits and public services, for example through assistance to make applications for Universal Credit, and support to interact with and use public services to meet specific support needs.

By the end of the third quarter of the project, eight beneficiaries had been successfully supported to apply for Universal Credit, with a further six pending applications. Two applications were refused despite staff considering them to be eligible, while one application was unsuccessful.

"They tried to help me as much as they can...I'm struggling with benefits...with papers...I don't have all the papers because everything is by email...my phone is broken...I don't know what to do." Project beneficiary, interview

As above, project staff felt that this represented a success, given the reluctance to apply for or receive benefits among many beneficiaries (explored in more detail in Chapter 3) and the additional time required to support some beneficiaries with applications for Settled Status in order to provide proof of eligibility for Universal Credit. By the end of the second quarter, 34 beneficiaries were offered support to apply for Settled Status (via referral to Europa Welcome), four of whom had been successful at the time of the evaluation (with five disengaging while the remainder were still in process). While attaining Settled Status only established eligibility for public services or benefits where applications were successful, this was considered a necessary first step towards accessing services for those beneficiaries. In addition, pre-settled status was sufficient for some beneficiaries to help them access employment and housing.

"If [beneficiaries] manage to get settlement status, getting benefits is much easier and then they can get on the homeless pathway... So a lot of work... is done in that field, linking them up with services who provide support or taking them to the library where they can do it or just telling them about it... Some clients they've never heard about [the EU settlement scheme]." Project staff, interview

There was also evidence that the Rough Sleeping strand was helping identify and support beneficiaries' health needs through facilitating access to health services. Eleven beneficiaries had required and received support from project staff. This included arranging appointments, being accompanied to medical appointments and receiving assistance to

communicate health concerns to medical professionals (to overcome language barriers) – often in collaboration with Luther Street Medical Centre,³² a GP surgery specifically catering for the homeless population.

While barriers to accessing public services remained for some beneficiaries due to the time required to make benefits applications and apply for Settled Status, the evidence suggests that the Rough Sleeping strand was providing individualised support to beneficiaries to overcome these barriers and had contributed towards this outcome for some. As delivery was planned to continue until March 2021, it is likely the project will contribute further to this outcome in future.

CMF fund-level resident outcomes

Intermediate outcome 5: Increased confidence that residents' concerns are being listened to and addressed

The Rogue Landlord strand intended to facilitate and improve the dialogue between the local authority and wider residents regarding concerns and complaints about rogue landlords, substandard accommodation and anti-social behaviour related to migrant populations. The original intention was to deliver this through two annual meetings with residents' groups in Oxford and two annual member forums for feedback from councillors. However, project staff subsequently decided that the intended approach was likely to be both inefficient (given that residents' groups tended not to be well attended) and logistically impractical for the PSST to deliver given their investigative responsibilities and small size. An alternative approach was therefore devised that included:

1. A wide-ranging publicity exercise that highlighted the work of the PSST and explicitly asked people to report problems. This included publicity in local print media such as "Your Oxford" (a magazine which goes to every household in the city), national print and online media and local radio^{33 34 35}; and
2. A survey consultation exercise conducted with fourteen residents' associations in March and April 2019 as a substitute for the annual residents' group meetings. At the one member forum delivered in 2018, members were also given details about where they could direct concerns and complaints. Project staff also wrote to members to notify them when they were operating in their wards and the project coordinator provided updates to councillors on both project strands.

Project stakeholders and staff considered this an effective way to communicate the work of the project and to convey the message that enforcement action would be taken against rogue landlords and unlawful accommodation. However, the approach elicited only a small

³² https://www.oxfordhealth.nhs.uk/service_description/luther-street-medical-centre/

³³ Mail Online (29 August 2019) "Rogue landlords are caught keeping tenants in appalling conditions - including some living in SHEDS - as pictures reveal how vulnerable people are forced to live in squalid and dangerous housing", available online: <https://www.dailymail.co.uk/news/article-7406533/Rogue-landlords-caught-keeping-tenants-appalling-conditions-including-living-SHEDS.html>

³⁴ The Telegraph (29 August 2019) "Oxford City Council uses plane with thermal imaging to clamp down on rogue landlords", available online: <https://www.telegraph.co.uk/news/2019/08/29/infra-red-planes-used-council-catch-rogue-landlords-keeping/>

³⁵ The London Economic (29 August 2019) "Council used a plane with thermal imaging to catch rogue landlords keeping tenants in 'appalling' conditions", available online: (<https://www.thelondoneconomic.com/news/environment/council-used-a-plane-with-thermal-imaging-to-catch-rogue-landlords-keeping-tenants-in-appalling-conditions/29/08/>)

number of responses (one from the survey consultation and four following the publicity campaign) with one resulting in investigation. Project stakeholders and staff offered alternative explanations for this situation: some suggested that the complaints data underpinning the rationale for the CMF bid did not reliably reflect the issue of rogue landlords and, therefore, it may not have been a significant resident concern; others felt that the lack of resident interest in the engagement activities indicated that the issue had been dealt with effectively by the project. Output data and interviews indicate that mechanisms for residents to express concerns were in place and where concerns were voiced, they were investigated by the PSST.

Staff also recalled receiving positive feedback from residents who were aware of the enforcement action and pleased that the PSST were addressing the issue. Staff also highlighted smaller numbers of residents raising concerns regarding the civil liberties implications of conducting investigations using thermal imaging.

Regarding resident concerns about homeless encampments, monitoring information showed there were public complaints about 33 homeless encampments and the PSST contributed to the removal of all of them through enforcement action, indicating that action had been taken. Project staff also reported that the Community Safety team (who received resident complaints) followed up with residents to let them know that action had been taken.

The evidence outlined above suggests that the Rogue Landlords strand had put in place measures to listen to and address resident concerns. Evidence of whether residents were aware of this, or that their confidence had increased, was beyond the scope of the evaluation.

Project-level outcomes

Intermediate outcome 6: Fewer incidences of nuisance or antisocial behaviour due to noise, waste and vehicles. Improved knowledge that properties in the vicinity are occupied by safe numbers and that illegal activity is no longer occurring in the neighbourhood.

The Rogue Landlords strand aimed to contribute towards decreasing nuisance and antisocial behaviour through the removal of illegal encampments from public land, ensuring properties were occupied by safe numbers and addressing illegal activity through investigation of suspected substandard dwellings and enforcement action. While not identified during the scoping stage of the evaluation, this project-level outcome also relates to the CMF-fund level intermediate outcome *“improved cleanliness and quality of the local area”*.

In relation to reducing noise and waste, project stakeholders and staff reported that the PSST was jointly responsible (alongside Community Response and Community Safety teams) for the removal of all illegal encampments from public land where there had been public complaints. In order to remove encampments, the PSST was obliged to serve notices for statutory nuisance³⁶ under the Environmental Protection Act, which implied a

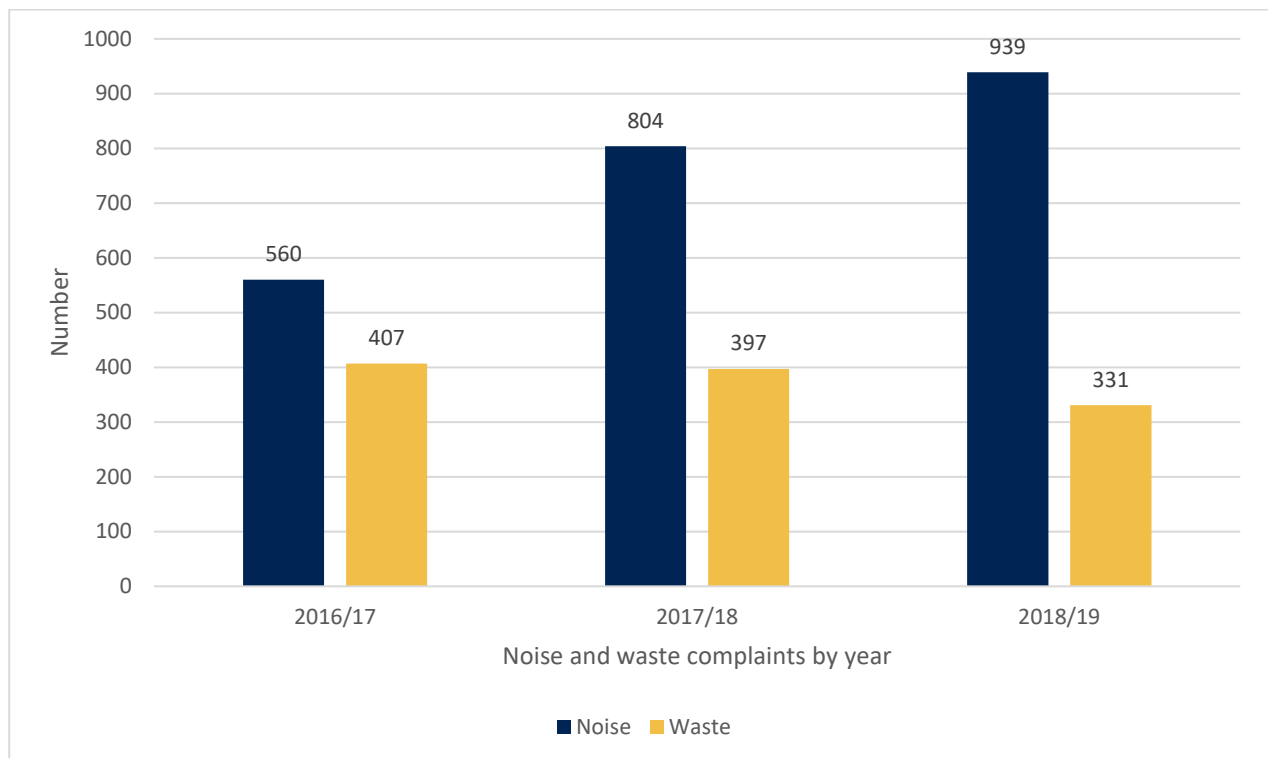
³⁶ A statutory nuisance is defined as “a nuisance which poses a threat to health”
https://www.oxford.gov.uk/info/20019/homelessness/1281/how_we_approach_some_of_the_issues_arising_from_rough_sleeping/5

public health and typically waste-related issue. However, this did not necessarily represent a permanent solution as, once a homeless encampment was removed project staff reported that there was nothing to prevent the encampment simply moving elsewhere. The extent to which this was a problem was unclear; project staff reported that there was “some anecdotal evidence of move on” but that this was not something on which data was collected. Staff felt that by referring occupants to wider support organisations, this decreased the likelihood that encampments would reappear, as occupants would receive additional help to meet their housing needs. However, data on whether occupants received support or the outcomes from this support were not recorded.

“We said we’d move on 100% of the encampments and we absolutely have... but in terms of change all we’ve done is move them on... They’ve just gone and camped somewhere else so in terms of have we really got to the root of the problem, no we haven’t... The qualitative picture is really, really complicated and really, really difficult” Project stakeholder, interview

Project staff and internal stakeholders felt that anti-social behaviour complaints data was not a suitable metric by which to judge the impact of the project, as it was not possible to disaggregate the impact of the project from the wider response to antisocial behaviour in Oxford (including drug dealing, drug taking, alcohol related ASB and verbal abuse). PSST project staff also reported that any increase in antisocial behaviour may have been the result of a change in recording approach rather than a reflection of a genuine increase in antisocial incidents. Data collected by the Community Safety team on noise and waste complaints indicated that while waste complaints decreased over the project lifecycle, noise complaints increased. Again, it is not possible to definitively attribute any change to the project.

Figure 4.2: Oxford City Council noise and waste complaints data 2016/17 to 2018/19



In relation to ensuring that housing was occupied by safe numbers, project staff reported that the investigation activities of the PSST revealed three cases of overcrowding encountered through inspections. In all cases, referrals were made to the Houses in Multiple Occupation (HMO) Enforcement team to take action.

The above evidence indicates that while the project contributed towards removing illegal encampments, evidence is lacking as to whether this was a sustainable solution. While the scale of the issue of over-occupation of properties was lower than expected, the evidence suggests that the project contributed towards identifying overcrowded properties and referring cases to the appropriate team in a small number of instances.

Unintended outcomes

There was evidence that the project contributed to four unintended outcomes. In the Rogue Landlords strand, project stakeholders and staff reported that the PSST had both **“Expanded strengthened networks and partnerships”** and **“Improved signposting and referral systems”**. This was particularly true of the relationships developed with the UK Visas and Immigration’s (UKVI) Immigration Enforcement team and the Willow Project, but also extended to St Mungo’s and the Rough Sleeping strand. Although the two strands had not overlapped for very long, project staff also felt that now a working relationship between the PSST and St Mungo’s was in place it should help signposting and referrals in the future.

“All that partnership working has really improved through doing that project... All that partnership work will stay and that enables [PSST staff] to tackle that problem in a much more holistic way” Project staff, interview

There was also emerging evidence that the Rough Sleeping strand was contributing to improved signposting and referral routes. As well as supporting accommodation transition, the relationship between Rough Sleeping strand project staff and Crisis provided a referral route for training and accreditation. Oxford Polish Association, Asylum Welcome and Turning Point all offered important signposting and referral routes. As discussed above, the relationship with Oxford Polish Association and subsequently Oxford Polish School resulted in the delivery of regular English for Speakers of Other Languages (ESOL) provision for Polish project beneficiaries - evidence of contribution to the CMF intermediate outcome of **“Access to ESOL and EAL provision”**.

Progress towards longer-term outcomes

As the evidence suggests both strands contributed towards the intermediate outcome of **“increased insight into local migration patterns”** (particularly in relation to the Rough Sleeping strand) This suggests an increased knowledge of local migration patterns and what works locally. There is already some evidence, outlined above, that the insight gained through the project is contributing towards the CMF longer-term outcome **“evidence for future service planning and resourcing”**.

There is some evidence to suggest that removal of migrant encampments and referral of overcrowded properties to the HMO Enforcement team may have contributed to the intermediate outcome of **“improved cleanliness and quality of the local area”**. As long as

these improvements are sustained, this suggests that the Rogue Landlords strand will contribute to the CMF longer-term outcomes of **“Improved cleanliness and quality of the local area”** in future. Through the investigation, enforcement and publicity activities undertaken by the PSST, project staff also felt that landlords would be deterred from renting substandard properties in future, which may further contribute to this outcome. This in turn may contribute **to improved perceptions of migrants** among wider residents, however, the evaluation was unable to find clear evidence of this due to the absence of data on resident perceptions (both in relation to outcomes from enforcement activities and wider communication with residents).

The evidence suggests that the Rough Sleeping strand contributed towards increasing access to services for EEA rough sleepers and addressing housing issues (although this was in an early stage at the time of the evaluation). Therefore, if access to services leads to improved outcomes for beneficiaries in relation to health and housing, this is likely to contribute to **improved wellbeing** and **increased living standards**. Due to a lack of data on outcomes for occupants of substandard housing, evidence is lacking as to whether the Rogue Landlords strand will contribute towards this outcome in future.

5 Key findings: Value for Money

Introduction

Cost-Benefit analysis was conducted in order to assess value for money of the CMF funds granted to the Rough Sleeping and Rogue Landlords project, as outlined in Chapter 2. The assessment weights the project's total economic costs against its monetizable social benefit.

The analysis used project data and secondary data to monetise the benefits accrued by each project strand. As there was no control (counterfactual) group against which to assess the impact of the project, artificial baselines were constructed (outlined in more detail below). Given the nature of the data used in the construction of the cost benefit and cost effectiveness models, the accuracy of results produced by the models should be interpreted with caution.³⁷

In addition to the cost-benefit analysis an additional secondary data search was undertaken to further inform the value for money assessment. This assessment is supplemented by perceptions regarding value for money gathered through qualitative consultations with staff, stakeholders and beneficiaries.

For more information on the methodological approach, see Chapter 2 and Appendix 1.

This assessment does not take into account non-monetizable benefits of project outcomes (such as increased insight into local migration patterns or resident confidence that their concerns have been listened to and addressed), which are explored in Chapter 4.

Value for money assessment

Cost-benefit analysis

The social benefits are captured through two domains: **housing** (as a result of housing improvements), and **health and wellbeing** (as a result of a moving out of homelessness and/ or experiencing improvements to housing). As such, the outcomes of interest for this analysis were: **housing issues resolved and increased access to public services**. These outcomes were selected due to the well evidenced link between improvements in housing and reductions in homelessness and monetizable social benefits in the form of improved health and wellbeing and public service savings resultant from both improvements in housing and individuals moving out of rough sleeping. Other outcomes are explored further through secondary analysis in the following section. Due to the lack of an established evidence base to monetize other outcomes, they were not included in this analysis and are explored in Chapter 4.

³⁷ The Maryland scientific methods scale scores methods for counterfactuals construction on a scale of one to five (with five representing the most robust method). Due to the use of measures of additionally in the construction of the counterfactual, the approach taken for this analysis cannot be attributed a score. Therefore, the accuracy of results produced by the models should be interpreted with a high degree of caution. For more information, see: https://whatworksgrowth.org/public/files/Methodology/Quick_Scoring_Guide.pdf

The total cost of the project delivery was £416,546. The total cost of the Rogue Landlords strand was £145,202, which was used to carry out targeted investigations and enforcement activity against rogue landlords and illegal dwellings. The total cost of the Rough Sleeping strand was £271,344.

Table 5.1: Costs associated with the Rough Sleeping and Rogue Landlords project

Cost	Value
Rogue Landlords project delivery	£145,202
Rough Sleeping project delivery and sheltered accommodation cost	£271,344
Total cost of project delivery	£416,546

Over the duration of **the Rogue Landlords strand**: 23 persons living in unlawful dwellings were provided with assistance (referred or signposted to wider support); action was taken against 68 dwellings resulting in reported improvements and safe, legal conditions; and 42 addresses were served with notices which reduced the risk of serious hazards.

The monetized benefits in terms of health and wellbeing from improvements in housing are taken from the Greater Manchester Combined Authority (GMCA, formerly New Economy) Unit Cost Database. The economic value of this support in terms of improved wellbeing is equivalent to £2,100 per individual over the course of their lifetime (allowing for an optimism bias adjustment of 40%). The estimated savings to the NHS as a result of housing improvements are made using estimates based on the Housing Health & Safety Rating System (assuming that the actions have reduced or mitigated the most serious hazards included in the safety rating system).

In addition to housing improvement, 25 individuals were referred to the Willow Project which supports victims of modern slavery. While it was not possible to capture the full economic benefits associated with a reduction in modern slavery (see section on secondary data analysis below) it was assumed that there was an emotional wellbeing benefit associated with being referred to the Willow Project and having access to support.

During the **Rough Sleeping strand**, 11 individuals were supported out of homelessness into some form of temporary or supported accommodation. Secondary data provides estimates of the average duration of rough sleeping which indicates the amount of time these individuals would have remained sleeping rough in the absence of the intervention.

An evidence review from the Ministry for Housing, Communities and Local Government³⁸ provides estimates on the social cost associated with homelessness (rough sleeping). These estimates have been inflated to 2020 prices to provide an estimate of £61 per rough sleeper per night. This cost includes the impact on public services including health, mental health services and costs incurred by the criminal justice system as well as the mental

³⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7596/2200485.pdf

health cost for the rough sleeping individual. The total social cost of sheltered accommodation is estimated to be £12 per individual per night. This results in a cost saving of £49 per night per individual moved from rough sleeping to sheltered accommodation.³⁹ The average duration of rough sleeping is estimated to be 120 days.⁴⁰ As it is not known at what point the project intervention moved each individual from rough sleeping to sheltered accommodation, it is assumed to be at the midpoint (i.e. after 60 days). Table 5.2 below summaries the monetised value of the estimated benefits resulting from the project.

Table 5.2: Monetizable benefits from the Rogue Landlords and Rough Sleeping project

Benefit	Value
Public service cost savings from moving from rough sleeping to sheltered accommodation	£28,888
Monetized value of improved health and wellbeing resultant from: - Being referred to the Willow project - Repairs resulting in safer housing - Saving to the NHS as a result of the improvement work carried out on addresses served with notices which reduce the risk of serious hazards ⁴¹	£236,436
<i>Employment: Estimated economic benefit from supporting individuals into paid employment</i>	<i>£55,667 (not included in BCR)</i>
Total economic benefit	£265,324

Dividing the total benefits of project delivery by the total costs presented above derives a cost-benefit ratio of **0.64, suggesting that every £1 spent by the project returned on average £0.64 monetizable economic benefit to society.**

Although the estimated ratio of 0.64 infers that the costs associated with the project outweigh its measurable benefits there are several key points that should be considered alongside this figure:

- **Only monetizable benefits have been included within the analysis of benefits:** Estimated benefits were assessed based on measured and monetizable outcomes.

³⁹ All types of sheltered/supported accommodation are assumed to incur the same economic cost.

⁴⁰ <https://www.coalitionforthehomeless.org/state-of-the-homeless-2018/>

⁴¹ Savings to the NHS are based on an estimate calculated by the project using the Housing Health Costs calculator (available at: <https://www.bregroup.com/services/advisory/housing-stock/housing-health-cost-calculator/>). Disaggregated data was not available to the evaluation.

Therefore, some direct and indirect social benefits may not have been captured through the CBA modelling.

- **Attention must be paid not just to the ratio itself, but to whom the benefits and costs are accruing:** The benefits in this analysis accrue to a vulnerable minority population (EEA rough sleepers). From a social perspective, the intervention is thus acting to reduce inequality, and such as may be preferred to alternative intervention with a marginally higher Cost-Benefit ratio, but where the benefits accrue to a less vulnerable population.
- **The Rough Sleeping strand** was only part way through project delivery and had encountered barriers to providing support to beneficiaries, including the length of time required to obtain settled status, a precursor to receiving benefits and ultimately access to housing for many. Therefore, we may expect the cost benefit ratio to increase as the project progresses.

Secondary data analysis

During the project, the PSST referred 25 victims of exploitation to the Willow Project to receive support. It could be hypothesised that a proportion of these referrals would not have happened in the absence of the project and thus the project contributed to a reduction in cases of modern slavery. This outcome was not included in the cost-benefit analysis as a result of the unknown number of referrals that resulted in an actual reduction in modern slavery and the difficulty in attributing this benefit to the project referral as opposed to the direct support provided by the Willow Project. Nonetheless, studies have found the economic costs of modern slavery to be significant, including physical and emotional harm costs to the individual affected, as well as costs incurred by law enforcement and victim support services. A 2018 study by the Home Office⁴² estimated that the economic cost per victim of exploitation in the UK was £328,720.⁴³ At such, any contribution towards reducing modern slavery could result in significant economic savings.

The Rough Sleeping strand also supported beneficiaries to access ESOL provision suited to their needs. Evidence surrounding the cost-benefit of ESOL provision in the UK is mixed. A 2013 study by the Department for Business Innovation and Skills found slight increases in employment rates and receipt of benefits following ESOL courses. However, econometric analysis found no significant returns for individuals in terms of subsequent time in work, of earnings, or of reduced time on benefits, suggesting that the economic benefit of these courses was negligible. However, these findings may be mitigated by the fact that benefits may take longer to achieve than the study period examined.⁴⁴

Qualitative assessment of project costs and benefits

⁴² Home Office, 2018, The economic and social cost of modern slavery

⁴³ Average weighted mean of labour exploitation, sexual exploitation and domestic servitude.

⁴⁴ Department for Business Innovation & Skills, 2013, Evaluation of the Impact of Learning Below Level 2. Available here: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/253585/bis-13-1261-evaluation-of-the-impact-of-learning-below-level-2.pdf

Perceptions of project costs and benefits were also explored through depth interviews with staff, stakeholders and beneficiaries. The analysis acts to supplement the quantitative value for money assessment presented above.

Project staff from both strands highlighted how regular reporting to the project lead helped account for progress and spend. However, staff reported that a lack of clarity about outputs and expectations early on in the project made it more difficult to account in detail for how the funding was used, as direct costs largely related to staff wages. Project staff suggested that clarity on objectives and resulting changes to the reporting process improved later on in the project.

Project staff largely felt it was too early to say whether the Rough Sleeping strand reflected value for money, as many of the relevant outcomes for beneficiaries were longer-term. Project staff suggested that providing proactive support to rough sleepers to identify sustainable housing solutions and access benefits and wider services was likely to reduce presentations to A&E as beneficiaries were provided with the support they required before reaching a “crisis point”.

As outlined in Chapter 4, the project also contributed to a monetary benefit through issuing civil penalties to landlords (with fines totalling £6,500), although the outcome from these fines was not recorded.

“In terms of the costs for human life it’s exceedingly good value...I think that what we’ve got...is a lot of good information that should put Oxford City in a position whereby we know the private sector that it’s all about preventative healthcare...” Project staff, in-depth interview

In relation to encampments, staff suggested that by moving these on they had reduced the public health risk posed and prevented this from becoming entrenched, which could represent a future cost saving to the local authority.

Staff also suggested that by raising awareness among local landlords about the robust enforcement action that would be taken against substandard properties and dwellings would reduce the likelihood of landlords using properties in this manner in future. This could potentially reduce future costs for enforcement activities.

“Now at the end of the two-year project the message [to landlords] is very clear...you will be found out. So in that sense it’s enabled us to concentrate our efforts and prevent something from spiralling out of control” Project staff, depth-interview

Rogue landlords strand staff suggested that they would not have been able to undertake the number of investigations they had without the CMF funding. This was due to the proactive approach that the additional capacity afforded. As a result, staff felt they would likely not have identified many substandard properties and been able to take the necessary action to improve conditions. Staff also identified increased partnership working and identification of good practice as additional benefits of the proactive approach through the project

“We’re in a much better position, all the partnership work we’re doing, all the good practice work we’re doing wouldn’t have happened, it would have just gone on, business as usual which is pretty reactive” Project staff, depth-interview

On the Rough Sleeper strand, staff felt that without the funding, it would not have been possible to fund the EEA Migrant Worker role. As a result, staff reported that the needs of EEA migrant rough sleepers would not have been understood to the extent afforded by this focused and specialist resource. Staff also felt this would have resulted into EEA rough sleepers not being identified and remaining highly vulnerable without support. This was also apparent from beneficiary interviews: for example, one project beneficiary also felt that without the support of the EEA Outreach Worker they would not know where to access support.

"[If the project didn't exist] wow, [it would be] a disaster for me because I don't know what to do...[there would be] no one here to help me" Project beneficiary, depth interview

6 Conclusions and lessons learned

This chapter provides overall conclusions and identifies key lessons from the Rogue Landlords and Rough Sleeping project both in terms of delivery and outcomes. There is additional consideration of what works, for whom, in what circumstances, as well as project replicability, scalability and sustainability.

Overall, this evaluation indicates that the Rogue Landlords strand contributed to addressing the macro issues of poor housing conditions and the impact of poor housing in the community. The Rough Sleeping strand showed signs of possible contribution to 'reducing migrant rough sleeping', but given the project started in the summer of 2019 it was too early to draw any firm conclusions.

What works?

A range of interrelated success factors and key enablers for delivery and progress towards impact emerged. These include:

- Dedicated, ring-fenced resource for a specific, clearly identified issue and population and ensuring project delivery teams have the necessary capabilities and capacity to deliver, particularly in terms of engaging and working with vulnerable target populations such as migrant rough sleepers.
- Where project delivery teams did not have the necessary capabilities or capacity to engage with, and meet, the needs of target beneficiary populations or deliver as intended, recognising and addressing that shortcoming through **developing capabilities and skills either through relevant training and/or working with better placed partners** worked well to overcome these barriers.

The most prominent challenges, barriers and lessons learnt include:

- **Challenges inherent in accurately diagnosing the nature and extent of the issue of unlawful dwellings.** While the project took an evidence-based approach, due to the transient nature of some private sector housing occupants and the unreliability of resident complaints, the available information must be recognised as limited.
- **Ensuring projects with multiple strands intended to complement one another and can be delivered as envisaged.** This may require anticipating the potential for scarce supply for specialist roles, compounded by short-term funding.
- **Factoring the complex needs of the intended beneficiaries to intended outputs and design** as much as possible. EEA migrant rough sleepers were found to have complex underlying needs – specifically substance abuse. The dedication and skills of the EEA Migrant Worker role meant these needs were being met to an extent, however the planned short-term accommodation pathway and anticipated timeframes for support provision were not possible to meet

- **Allowing sufficient time for engagement and trust-building with populations that are vulnerable or have complex needs.** The success of the EEA migrant worker role (and in part related to difficulties engaging occupants of substandard properties) indicates that these audiences require consistent, intensive engagement and support from skilled professionals, which should be built into the project design as early as possible. Working in partnership with trusted and specialist organisations (the Willow Project) when undertaking enforcement action appeared to overcome some of these challenges.

For whom?

The contribution to outcomes for the local authority were most apparent, particularly from the Rogue Landlords strand. Although the local authority did not gain any increased insight into local migration patterns, the PSST became better equipped to undertake investigation of suspected substandard property, principally through collaboration with the UK Visas and Immigration's (UKVI) Enforcement team and the Willow Project. In addition, the intelligence derived from the project was useful to the local authority in terms of understanding the scale of the problem of 'beds in sheds', in communicating with residents and in terms of future planning and resource allocation. The local authority also benefited from the Rough Sleeping strand in terms of improved intelligence about a hard to reach group with complex needs and an evolving understanding of what was required to support this population in meeting their needs. For example, helping them to become independent, stopping rough sleeping as well as more concrete outcomes such as reconnection of migrant rough sleepers with their country of origin.

The extent to which **residents** benefited from the project was unclear. The Rogue Landlords strand addressed alleged resident concern through investigative work, enforcement action and property improvement and put in place mechanisms for dialogue with residents around the issue of Rogue Landlords and 'beds in sheds'. Public complaints about illegal encampments were addressed and dealt with by the PSST with all encampments moved on, albeit not permanently. However, the mechanisms for dialogue elicited very little interaction or communication with residents and monitoring information that might have more accurately assessed benefit to residents – antisocial behaviour, resident complaints - was insufficiently specific and could not be attributed to the project.

The benefit of the Rogue Landlords strand to **migrants** was relatively limited in the sense that the scale of the problem was difficult to decipher and may have been over-estimated based on existing data, or more hidden than anticipated. Where the PSST did interact with migrants, engagement was somewhat limited (in the sense that the focus of the funded roles was on enforcement action and support related to signposting and referrals to specialist organisations). However, although the impact of referrals was out of scope of the evaluation, the knowledge gained by enforcement staff through training to recognise signs of trafficking may benefit migrants in future. The Rough Sleeping strand was more obviously beneficial to migrant rough sleepers in terms of engaging the population and understanding and addressing need. However, the extent to which this population could realise their independence (i.e. make a sustainable transition into independent accommodation) appeared to be both more challenging than originally envisaged and allowed for by the initial project design. However, as the project is in an early stage of delivery, this strand may contribute further to this outcome in future.

In what circumstances?

The key contextual factors influencing delivery of the Rogue Landlords strand **were the available data and existing understanding of the issue of ‘beds in sheds’** and potentially **the legal obligation to provide notification of intended investigation of suspected unlawful properties**. The key contextual factors influencing delivery of the Rough Sleeping strand were **the scarcity of available accommodation in the private rented sector in Oxford, the availability of sufficiently well remunerated employment and the availability of support to effectively respond to, and mitigate, substance misuse amongst the beneficiary group**.

Progress towards outputs and outcomes was greatest where delivery agencies were able to provide some combination of (i) upskilling to meet the demands of their role and needs of their target population and intended beneficiaries; (ii) a collaborative delivery approach to mitigate existing shortcomings / leveraging existing infrastructure to support delivery; and (iii) reliable identification and engagement of the target beneficiary population.

Could the project be replicated?

The factors identified for successful delivery of the Rogue Landlords project as outlined above suggest that with dedicated resource and focus, the investigation component of the project could be delivered in other contexts. Without the prolonged absence (October 2018 – May 2019) of an Environmental Health Officer (See Sections 3.3 and 3.4), it is likely that more investigations would have taken place and conceivable that more enforcement activity might have taken place. However, it is less clear that the enforcement component (i.e. investigation resulting in enforcement or legal action as well as support for vulnerable populations) could be delivered in other contexts. Successful delivery would be contingent on the same factors as in Oxford, that is, sufficiently reliable data to successfully target suspected unlawful dwellings occupied by vulnerable migrant populations. This would require either access to data not typically available at a local authority level or a joint-working relationship with UKVI. Other factors influencing successful delivery of the enforcement component of the project (such as the legal obligation to provide notification of intended investigation and the actual scale of the problem of ‘beds in sheds’ in the local area) were outside the control of the local authority but influenced delivery of planned outputs for this activity.

Although relatively early in the project, the factors identified for successful delivery of the Rough Sleeping strand indicate that it may be challenging to replicate in other contexts. In addition to a dedicated outreach worker for a specific migrant rough sleeper population, successful replication of the project requires significant existing infrastructure likely available from a delivery partner – in this case St Mungo’s - around the identification and support of homeless and rough sleeping populations and a broadly supportive voluntary and community sector. The project demonstrated that successfully supporting a population with high-level, complex needs into independent accommodation requires significant time and engagement to support this population to access public services and benefits, additional financial support for rent and/or a deposit in the PRS, and available social housing. Successfully sustaining any transition or independence may also require access to effective support for substance and specifically alcohol misuse. Recruitment of an ‘EEA migrant worker’ role may also take time and be subject to the same constraints,

as with the Environmental Health Officer for the PSST (a reluctance on behalf of potential employees to take up fixed-term contracts and the scarcity of suitably qualified candidates). It may also be particularly challenging to identify and recruit an individual capable of delivering in what is a demanding role.

Could the project be scaled up?

While it may be feasible, it may not be necessary or desirable to scale-up the Rogue Landlords strand. There are more PRS properties in Oxford (~13,000) that might be investigated, and a significant number of those properties investigated were unoccupied (519/1263) or inaccessible (88/1263) at the time of investigation. However, project stakeholders and staff reported that investigative work to date was sufficient in establishing the scale of the 'beds in sheds' problem and how to manage it. As a result, by the end of the project it was appropriate to return to a more reactive model of investigation and enforcement. Scaling-up of the project was not considered beyond the local authority.

Given the **Rough Sleeping strand was effectively a pilot at a relatively early stage, alongside the fact that, at the time of writing, there were significant changes to homelessness services underway in Oxford,⁴⁵ it is difficult to assess scalability.** The Rough Sleeping strand will effectively be integrated into the new service which implies the possibility of more short-term (i.e. 28 day) beds being available to EEA migrant rough sleepers. However, learnings from the evaluation indicate that sustainable scaling up of the project would likely require 'pathway' accommodation available for longer than 28 days, as well as greater attention to accessing public services or benefits, sufficient funding for rent in the PRS, and managing substance and alcohol misuse problems effectively.

Is there evidence of sustainability beyond the lifetime of the project?

The Rogue Landlords strand will continue without CMF funding in the sense that the PSST will still undertake investigative activity in a more efficient, effective way, based on project learnings. However, there will be a less specific focus on 'beds in sheds' and this work will be more reactive and absorbed into the day-to-day work of the team, with assessments of housing conditions made under existing legislation.⁴⁶ While the project is sustainable in the sense that it will not simply stop when funding is no longer available, there was little evidence that addressing rogue landlords and 'beds in sheds' remain a priority issue or need.

The Rough Sleeping strand was at a relatively early stage, which makes an assessment of sustainability more difficult. Project stakeholders reported that the degree to which the Rough Sleeping strand was sustainable would depend on whether the project

⁴⁵ https://www.oxford.gov.uk/news/article/1276/transformation_of_homelessness_services_continues_with_floyds_row_handover

Floyd's Row will provide assessment services and shelter for up to 56 people including 20 Somewhere Safe To Stay beds or up to seven nights to people at risk of rough sleeping and new rough sleepers while they participate in an intensive "right first time" assessment that identifies suitable housing and links them with the other support they need to leave homelessness behind and another 20 "staging post" beds for people who have been assessed by Somewhere Safe to Stay and need more time – using the 28 day window - to move on to other accommodation.

⁴⁶ Under Part 1 of the Housing Act 2004, local authorities have a duty to assess housing conditions in their district.

demonstrated impact and whether it was feasible and desirable to continue to support the role of the EEA migrant worker beyond CMF funding. An additional consideration around sustainability is whether the project model and specifically the use of temporary accommodation as a 'pathway' for migrant rough sleeper population can be effective. The available evidence indicates that it is too early to make that assessment. Nonetheless, one stakeholder considered that while the UK's departure from the European Union was likely to change the local migration landscape, significant risks and support needs were likely to remain due to a reduced safety net to those who do not obtain settled status or arrive in the UK on a visa in future. Therefore, the insights gained through the dedicated EEA Migrant Worker role were likely to have an ongoing significance and value.

7. Appendix 1: Methodology and technical note

Evaluation Methodology

Qualitative evidence

Qualitative evidence was collected by Ipsos MORI researchers (Table 7.1). Participant identification and selection for the Rogue Landlord strand was initially made (June 2019) on the basis of conversation with the CMF Project Manager and existing understanding of the project with the aim of eliciting responses with participants involved both at a strategic and a frontline, delivery level. Subsequent follow-up interviews (October / November 2019) were conducted with participants who had demonstrated sufficient familiarity with the project.

In June 2019, it appeared that the Rough Sleeping strand would be excluded from the evaluation and the project had only very recently started at the time of the first interview in September 2019. Subsequent interviews were conducted with delivery staff and beneficiaries of the project. The project beneficiaries were a mix of those asked to attend, one of whom was currently staying in the temporary pathway accommodation and other beneficiaries who attended a drop-in with the EEA Migrant Worker and were invited to take part in an interview.

The principal limitations with the qualitative evidence were selection and response bias, a lack of beneficiary feedback and a lack of methodological triangulation derived from a reliance on interview data. The lack of beneficiary feedback, particularly from residents, was unfortunate but understandable. The mechanisms for resident feedback originally intended by the Rogue Landlords strand were altered as the project progressed and the replacement mechanisms elicited very little response and the Rough Sleeping strand had no explicit link to, or interaction with, residents.

Table 7.1: Qualitative research undertaken

	Project Strand	Participant Type	N =	Method
June 2019	Rogue Landlords	Project stakeholder	2	In-depth interview
		Project staff	3	In-depth interview
September 2019	Rough Sleeping	Project stakeholder & project staff	2	Paired in-depth interview
October/ November 2019	Rogue Landlords	Project stakeholder	1	In-depth interview
		Project staff	2	In-depth interview
	Rough Sleeping	Project stakeholder		In-depth interview
		Project staff	1	In-depth interview
		Beneficiaries (Migrants)	3	In-depth interview

Secondary data and monitoring information

Monitoring data on relevant outputs was collected by the project and shared with Ipsos MORI. This included progress reports with supporting quantitative data both from the local authority and St Mungo’s. The Rogue Landlords strand collected data on number of inspections, accommodation use (Table 7.2 below) actions taken as a result of investigation as well as relevant contextual information such as Housing Health Calculator estimates (Table 7.3 below) and anti-social behaviour data (Table 7.4 below).

The main limitation with some of the data for the Rogue Landlords strand – Housing Health Calculator estimates, antisocial behaviour - was that it was available only at an Oxford-wide level and consequently the specific contribution of the project strand could not be identified with any precision. For the Rough Sleeping strand this included basic demographic information (age, gender, nationality), accommodation outcomes, ease and extent of engagement, access to public services or benefits, settled status, employment status and needs around health, substance misuse and language support. Data for the Rogue Landlords strand was collected either by the project or by colleagues - antisocial behaviour statistics were collected by the Regulatory Services and Community Safety team - and shared in October/November interviews or subsequently in email exchanges.

Table 7.2: Breakdown of use of suspected unlawful properties investigated

Use	Number	%
Not occupied	519	41.1
Storage	324	25.6
No access	88	6.9
Office	70	5.5
Summerhouse	66	5.2
Hobby room	48	3.8
Workshop	45	3.7
Day room	40	3.2
Occupied	33	2.6
Gym	13	1
Potential	13	1
Laundry room	2	0.15
Sauna	1	0.1
School	1	0.1

Table 7.3: Housing and Health Calculator savings estimates for overall enforcement activity

“Hazard”	Savings to NHS (£)	Savings to Society (£)
Excess cold	123585	2126174
Fire	13086	206717
Excess heat	11949	176333
Damp and mould growth	9642	55674
Electrical hazards	8104	31450
Falling on stairs	7700	74337
Food safety	5355	9377
Domestic hygiene...	5108	8650
Falling between levels	4353	32053
Personal hygiene, Sanitation	4226	7683
Falling on level surfaces	3121	7031
Flames, hot surfaces	1936	4664
Entry by intruders	1558	2850
Structural collapse	433	3839
Crowding and space	223	3145
Collision and entrapment	177	320
Lighting	51	203
Carbon monoxide	36	59
Position and operation of amen...	22	39
Water supply	6	10
Total for Oxford City Council	Savings to NHS	Savings to Society
	200,671	2,750,608

Table 7.4: Antisocial behaviour complaints: noise and waste

	Complaints related to noise	Complaints related to waste
2016/17	560	407
2017/18	804	397
2018/19	939	331

Value for money assessment

In order to assess the feasibility of a cost-benefit analysis (CBA) or cost-effectiveness analysis (CEA) each of the 14 projects were assessed using the 8-step process below. Based on this assessment, each project was triaged to one of three methodological groupings:

1. **Cost benefit analysis (CBA):** Where data on quantitative and monetizable outcomes was available, a cost-benefit analysis was conducted;
2. **Cost effectiveness analysis (CEA):** Where quantitative measures for outcome(s) existed, but no data (primary or secondary) was available to monetize the outcomes, cost effectiveness analysis was conducted; or
3. **No feasibility for quantitative analysis:** Where there was no quantitative measure of outcomes available to the evaluation, neither cost benefit analysis nor cost effectiveness analysis could be conducted. In this case, a qualitative assessment of project costs and benefits was undertaken based on analysis of staff, stakeholder and beneficiary perceptions from qualitative consultations. Secondary data on potential monetizable benefits was also reviewed.

Figure 7.1: Eight step model for reviewing project outputs and outcomes

The process for conducting the cost-benefit analysis follows the 8 key steps outlined below.



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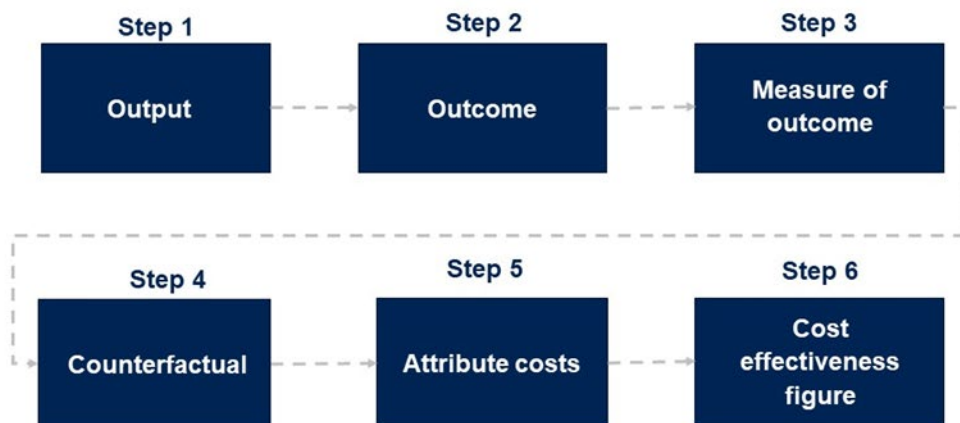
Ipsos MORI 

Cost-benefit analysis followed an eight-step process:

1. **Identify the projects outputs** (e.g. number of individuals provided with housing support)
2. **Identify the achieved projects outcomes** and the outcomes which are monetizable
3. **Identify monetary values for each outcome** from existing data sources
4. **Assign a counterfactual case for the outcomes** to estimate the number of outcomes achieved in the absence of the project; derived through primary information collection or secondary data analysis
5. **Monetize the outcomes** by multiplying the monetary value of each outcome by the number of additional outcomes achieved
6. **Estimate the persistence of the outcome** (i.e. is this a one-off benefit or ongoing, and how long does the benefit persist for into the future?)
7. **Calculate the total monetary benefits (cost savings)** by summing the total benefit for each outcome (including fiscal savings, public sector efficiency savings and public value benefits), accounting for any duplication of benefits across different categories.
8. **Compared the total estimated monetary benefits to the total costs** of the project, to estimate the estimated Benefit to Cost Ratio (BCR).

Cost effectiveness analysis followed a six-step process, outlined below:

The process for conducting the cost-effectiveness analysis follows the six key steps outlined below.



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1. Identify the projects outputs
2. Identify the achieved projects outcomes
3. Identify quantifiable values for each outcome
4. **Assign a counterfactual case for the outcomes** to estimate the number of outcomes achieved in the absence of the project. This is derived through primary information collection or secondary data analysis.
5. **Attribute costs** using a breakdown of the project costs. Costs that are related to the outcomes identified in Step 3 can be isolated and attributed to the relevant outcomes.
6. **Calculate the cost-effectiveness figure** of the project outcome, by dividing the outcome by the cost attributed to it to derive the cost per unit of that outcome.

Two models were developed using Excel. The CBA model calculated costs relative to the monetizable benefits. The CEA model calculated costs relative to the quantifiable outcomes achieved from each of the CMF interventions (without attempting to monetize these outcomes).

As there was no robust control (counterfactual) group against which to assess impact, artificial baselines were constructed. Where possible, input from project leads was used to inform the assessment of the counterfactual and in the cases that this was not available, conservative estimates were made. A hierarchy of counterfactual options are outlined below. Given the nature of the data used in the construction of the cost benefit and cost effectiveness models, the accuracy of results produced by the models should be interpreted with a high degree of caution.

Counterfactual development: hierarchy of counterfactual options

Counterfactual development

Assigning a counterfactual

In order to assess value for money for a project we must compare the project's outcomes against a baseline or counterfactual scenario. The aim of the counterfactual is to replicate--as close as possible-- the outcomes that would have been achieved in the absence of the project. A hierarchy of counterfactual options are presented below:

1. **Randomised, blinded control group.** Individuals are randomly assigned to two groups at the start of an intervention. This is the gold standard in trial design.
2. **Matched comparator group.** Individuals receiving the intervention are matched with non-participants, and the outcomes of participants and non-participants are compared. Matching methodologies include Propensity Score Matching. This aims to imitate, as far as possible, the random allocation of an RCT.
3. **Historical baseline.** Using the same outcomes over the period prior to the intervention to form a counterfactual case. However, this method does not control for temporal variation.
4. **Baseline proxied by secondary data.** Using published evidence such as researched measures of additionality, or other identified data points, to represent the baseline scenario.

Analysis / synthesis of findings

Qualitative data were systematically inputted into an analysis grid for each research encounter, allowing for more in-depth analysis of findings. There was one grid for each type of audience consulted. The grids follow the structure of the topic guide enabling the identification of relevant quotes for each element of the outcomes and process evaluation. A thematic analysis approach was implemented in order to identify, analyse and interpret patterns of meaning (or "themes") within the qualitative data, which allowed the evaluation to explore similarities and differences in perceptions, views, experiences and behaviours. A second analysis matrix was used to combine qualitative, secondary and monitoring data around outcomes and key delivery themes to triangulate evidence and assess its robustness.

Qualitative approaches explore the nuances and diversity of perceptions, views, experiences and behaviours, the factors which shape or underlie them, and the ideas and situations that can lead to change. In doing so, it provides insight into a range of perceptions, views, experiences and behaviours that, although not statistically representative, it nonetheless offers important insight into overarching themes.

Outputs achievements

Ipsos MORI undertook an assessment of the project's success in achieving its intended outputs based on consideration of the evaluation evidence generated. There are five measures that this assessment can take and that have been consistently applied throughout the individual project evaluations. These measures are based on the definitions below.

Table 7.5: Definitions of achievement measures

Achievement measure	Definition
Not achieved	The evidence indicates that the output has not been achieved
Partially achieved	There is some evidence to infer some of the output may have been achieved.
Partially achieved (on track)	There is some evidence to infer some of the output may have been achieved and that the project is on track to achieve the output beyond the timescale of the evaluation.
Achieved	There is evidence to conclude that the output has been achieved.
Exceeded	This refers to output where monitoring information shows projects exceed their target outputs.
Inconclusive	There is not sufficient evidence to provide a robust assessment of progress towards project outputs.

Project-level evaluation frameworks

Figure 7.2: Project-level evaluation framework: Rogue landlords

Output / Outcome / Impact (from logic model)	Who will measure it?	When will it be measured?	Target	Data source			
				MI	Observations	Interviews with migrants	Interviews with project staff
Outputs							
Rogue landlords:							
All 979 unlawful dwelling cases investigated. 20% of unlawful dwelling cases result in enforcement and/or legal action.	Project	After each investigation	979 potentially unlawful dwellings in Oxford	Council records			Interviews with project stakeholders and staff
50 vulnerable people in unlawful dwellings receive support	Project	Each time an individual receives support	50 vulnerable individuals	Council records			
Sixty additional landlords who deal with tenancy deposits and rents in cash per year reported, (approx. 5 per month) to the HMRC							
Illegal encampments from public land removed	Project			Council records			
Two annual meetings with councillors	Project and Ipsos	After each engagement	Two sessions per year	No notes or minutes were available from the one forum held in 2018	The original intention was for Ipsos to attend meetings where possible but only one 'member forum' with councillors was held, in 2018		
Two annual meetings with residents' associations	Project and Ipsos	After each engagement	Two sessions per year	The substitute survey consultation elicited a very small (<5) number of responses only one of which was followed up.	These meetings were replaced by a survey consultation		
Outcomes for new migrant communities							
Housing issues identified (i.e. overcrowding, substandard provision)	Project			Council records			Interviews with project stakeholders and staff; Research with migrants on this topic was not possible
Improved living standards							

Reduced exploitation							
Outcomes for the LA							
Increased revenue from enforcement of civil penalties (e.g. rogue landlords)	Project			Council records			
Outcomes for the resident communities							
Impacts							
Improved community cohesion							
Accessible public services to all							
Effective service delivery to address local migration issues							

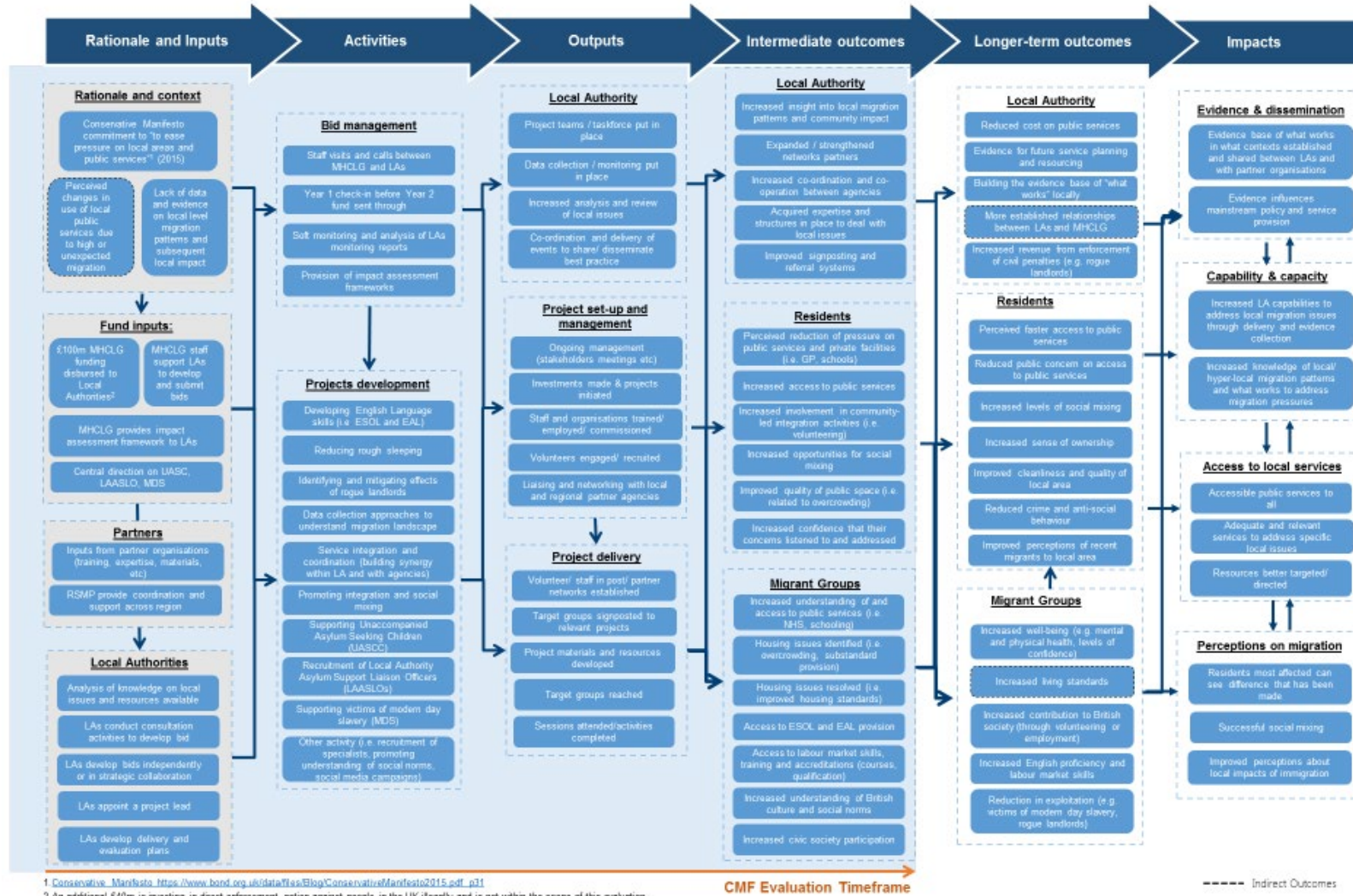
Figure 7.3: Project-level evaluation framework: Rough sleeping

Output / Outcome / Impact (from logic model)	Who will measure it?	When will it be measured?	Target	Data source			
				MI	Observations	Interviews with migrants	Interviews with project staff
Outputs							
Rough Sleepers:							
12 migrants from EEA per year to be successfully supported to meet their needs and have received the following preventative/relief treatment	Project	Recorded as the project progresses	12 migrants	Project reporting data		Three interviews were conducted with migrants	Ipsos to carry out interviews with project stakeholders and implementing staff
Outcomes for new migrant communities							
Increased access to accommodation for a limited period of time or support for return	Project			Project reporting data			Interviews with project stakeholders and staff
Increased access to public services	Project						
Increased well-being (mental and physical health)						Originally the intention was for Ipsos to carry out interviews/administer a questionnaire with migrants that are being supported through the programme but this was not feasible or desirable given project delay	

						and project staff requiring time to build trust with clients.	
Outcomes for the LA							
Improved communication and knowledge of local problems and ensure resources are targeted appropriately							Interviews with project stakeholders and staff
Increased insight into local migration patterns and community impact							
The council will be able to respond better to the local community needs							
More established relationships							
Increased knowledge of local migration patterns and what works							
Outcomes for resident communities							
Increased confidence that their concerns are being listened to and addressed.							
Improved quality of public space							
Impacts							
Improved community cohesion							
Accessible public services to all							
Effective service delivery to address local migration issues							

Appendix 2: Controlling Migration Fund Theory of Change

CMF fund-level Theory of Change



1. Conservative Manifesto: <https://www.bond.org.uk/data/files/Blog/ConservativeManifesto2015.pdf>, p11

2. An additional £40m is investing in direct enforcement action against people in the UK illegally and is not within the scope of this evaluation

Overall CMF logic model

Rationale is linked to activities and these are linked to outputs, outcomes and impacts.

Rationale

Context:

- There was a Conservative Manifesto Commitment to ease pressures on local areas and public services; There was a public perception that there were changes in the use of local public services due to high or unexpected migration; Local of data and evidence on local level migration patterns and subsequent local impacts.

Fund inputs:

- £100 million from MHCLG disbursed to Local Authorities; MHCLG staff support LAs to develop and submit bids; MHCLG provides impact assessment framework to LAs; Central direction on UASC, LAASLOs

Partners:

- Inputs from partner organisations (training, expertise and materials etc); RSMP provides coordination and support across the region.

Local Authorities:

- Analysis of knowledge on local issues and resources available; LAs conduct consultation activities to develop bid; LAs develop bid independently, or on strategic collaboration; LAs appoint a project lead; LAs develop delivery and evaluation plans.

Activities:

Bid management:

- Staff visits and calls between MHCLG and LAs; Year 1 check-ins before year 2 fund sent through; Monitoring and analysis of LAs monitoring reports; Provision of impact assessment frameworks

Project development:

- Developing English language skills (ESOL and EAL); Reducing rough sleeping; Identifying and mitigating the effects of rogue landlords; Data collection approaches to understand migration; Service integration and coordinating (building synergy within LA and with agencies); Promoting integration and social mixing; Supporting Unaccompanied Asylum Seeking Children; Recruiting local authority asylum support liaison officers; Supporting victims of modern day slavery; Other activities (recruitment of specialists, promoting social norms and social media campaigns)

Outputs

Local Authority:

- Project teams/ taskforces; data collection/ monitoring information; increased analysis and review of local issues; coordination and delivery of events to share and disseminate best practice

Project set up and management:

- Ongoing management; investments made and projects started; staff trained; volunteers engaged and recruitment; liaising and networking with local and regional agencies

Project delivery:

- Volunteers in post and networks of partners established; target groups sign posted to relevant projects; project materials and resources developed; target groups reached; sessions attended and activities completed.

Intermediate outcomes

Local authority:

- Increased insights into local migration patterns and community impacts; Expanded and strengthened network partners; increased coordination and cooperation between agencies; acquired expertise and structures in place to deal with local issues; improved sign posting and referral systems

Residents:

- Perceptions of reduced pressure on local public services; increased access to public services; increased involvement in community led integration activities; increased opportunities for social mixing; improved quality of public space; increased confidence that concerns are being listened to

Migrant groups:

- Increased understanding of and access to public services; housing issues identified; housing issues resolved; access to ESOL and EAL provision; access to labour market, skills and training, and accreditation; increased understanding of British culture and social norms, increased civic participation.

Long term outcomes:

Local Authority:

- Reduced cost of public services; evidence for future service planning and resourcing; building the evidence base of work works locally; increased revenue from enforcement of civil penalties

Residents:

- Perceived faster access to services; reduced public concern on access to public services; increased level of social mixing; increased sense of ownership; improved cleanliness and quality of local areas; reduced crime and anti-social behaviour; improved perceptions of recent migrants to local area.

Migrants groups:

- Increased well-being (mental health) levels of confidence; increased living standards; increased contributions to British Society; Increased English proficiency; Reduction in exploitation

Impacts:

Evidence and dissemination:

- Evidence base of what works in what contexts and shared between LAs and partners; evidence influence mainstream policies and service provision

Capability and capacity:

- Increased LA capabilities to address local migration issues through delivery of evidence collection; Increased knowledge of local hyper local migration patterns and what works to address migration pressures.

Access to local services:

Accessible public services to all; adequate and relevant services to address specific local issues; resources better targeted and directed

Perceptions on migration:

- Residents most affected can see difference that has been made; successful social mixing; improved perceptions of local impact of immigration.

Appendix 3: Research tools

CMF qualitative tools

Table 7.6: Qualitative tools for different participants groups

Participant	Research method	Outcomes measured <i>List of relevant outcomes measured</i>
Delivery staff	In-depth interviews	<ul style="list-style-type: none"> • Intermediate outcome 1: Increased insight into local migration patterns • Longer-term outcome 1: Increased revenue from enforcement action • Intermediate outcome 2: Housing issues identified • Intermediate outcome 3: Housing issues resolved • Intermediate outcome 4: Increased access to public services • Intermediate outcome 5: Increased confidence that resident concerns are being listened to and addressed • Intermediate outcome 6: Fewer instances of nuisance or anti-social behaviour
Wider stakeholders	In-depth interviews	<ul style="list-style-type: none"> • Intermediate outcome 1: Increased insight into local migration patterns • Intermediate outcome 2: Housing issues identified • Intermediate outcome 3: Housing issues resolved • Intermediate outcome 4: Increased access to public services • Intermediate outcome 5: Increased confidence that

		<p>resident concerns are being listened to and addressed</p> <ul style="list-style-type: none"> • Intermediate outcome 6: Fewer instances of nuisance or anti-social behaviour
Beneficiaries (EEA rough sleepers)	In-depth interviews	<ul style="list-style-type: none"> • Intermediate outcome 2: Housing issues identified • Intermediate outcome 3: Housing issues resolved • Intermediate outcome 4: Increased access to public services