Housing Professionals and the
Implementation of the Benefit Cap Policy in London

A thesis presented

By

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Abstract

The Welfare Reform Act 2012 paved the way for wide-ranging changes to means-tested benefits in England. One of the reforms, the benefit cap policy, limits the amount of housing benefit or local housing allowance that unemployed benefit recipients can receive from the state. This has had a direct impact on tens of thousands of benefit recipients' ability to meet their housing costs and can lead to them becoming homeless. Those people affected by the benefit cap are likely to interact with local housing officials to seek solutions when housing problems arise. In light of this, the aim of this thesis was to provide a qualitative account of how and why the practices of housing professionals in London changed following the introduction of the benefit cap. One of the research methods involved negotiating access to key officials at three local authorities and interviewing them about their reflections and experiences.

The findings are divided into two sets of factors. First, there was complexity of functions and boundaries between central and local government responsibilities. It is argued in this thesis that housing professionals' practices were changed in part by the poor fit between the national government's new policy and the local authorities' existing legal responsibilities towards homeless families. Consequently, tensions surrounding legislative, judicial and local interpretations of legislation emerged, which led to inconsistency between the government's intentions and the way the policy was put into practice. There was also increased divergence across the local authorities in how financial supplements to prevent homelessness were applied, leading to inequity in service provision.

Second, that welfare reform has culminated in a crisis of identity for housing sector workers as they have been caught between different laws and policies. Housing

professionals' roles have changed from processing housing applications to include development of creative ways of preventing homelessness, organising support packages to assist unemployed benefit recipients in complying with the benefit cap policy, applying eligibility conditions for accessing supplementary financial benefits, exercising discretion, and facing conflicting moral choices at work.

Traditionally, housing professionals are meant to discharge citizenship-based rights to housing, but they are, increasingly, also performing the role of social control agents in the enforcement of welfare conditionality towards unemployed benefit recipients who seek housing assistance. An original element of this thesis was creating a sociological typology reflecting housing professionals' newly ambiguous identities - 'social worker', efficiency strategist, conflicted bureaucrat, 'firefighter', and frustrated intermediary.

The findings of this study underline the critical role that local housing officials play in translating policies into practice. Critically for social policy-making, the findings show how what might seem a straightforward and clear policy at national government level can emerge as contested and ambiguous during the realities of its implementation at local level.

The findings contribute to the theoretical understanding of *welfare conditionality*, *governance* and *street-level bureaucracy* as applied to the housing field. The findings may also be useful to practitioners in the housing sector, housing/homeless charities, and local and national government.

<u>Declaration</u>

I confirm that the work presented in this thesis is all my own. I also confirm that the work is original except where indicated with in-text references, and no part of the thesis has been submitted for any other degree.

Signed..

This thesis is dedicated to my late dad
Josiah Nathaniel Ifalaja-Pratt (1927 – 1981)

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List of Acronyms

CIH	Chartered Institute of Housing
COG	Homelessness Code of Guidance
DCLG	Department for Communities and Local Government
DHP	Discretionary Housing Payments
DWP	Department for Work and Pensions
HB	Housing Benefit
IBAA	Inter-Borough Accommodation Agreement
LA	Local Housing Authority
RTB	Right to Buy
SLB	Street-Level Bureaucrats
SSAC	(Parliamentary) Social Security Advisory Committee
TA	Temporary Accommodation

Glossary of Technical Terms

Affordability
Financial assessment of an applicant's household income and expenditure to determine the type of property that they could reasonably afford and that would be suitable for the household's needs.

Applicant
A benefit recipient who presents to the LA for homeless assistance as a direct result of the reduction in their income brought about by the benefit cap application.

Bedroom tax (spare room subsidy)
A levy that reduces the housing benefit awarded to social housing tenants who have more rooms in their homes than their households need. The tenants are then expected to meet the shortfall in their rent themselves, usually from their welfare benefit receipts.

Benefit cap
The maximum amount that unemployed claimants can get from welfare benefits. Introduced in April 2013, the original amounts were £350 per week for single adults and £500 per week for families with dependent children. The Welfare Reform and Work Act 2016 created a two-tier system which saw the caps reduced to £296 for single adults and £442 for families with dependent children in London, and £258 and £385 respectively outside of London from November 2016.

Buy-to-let property
Property bought with a mortgage loan to let out as a business venture rather than lived in by the borrower.

Child Benefit
Welfare benefit paid to an adult responsible for the care of a child. Historically, it was a universal benefit, but individual higher rate taxpayers no longer qualify (although joint income can exceed the higher rate threshold and still qualify for this benefit). It is paid until the child reaches 18 or on completion of their formal education/training.

Child Tax Credit
Benefit paid by the government agency, Her Majesty's Revenue and Customs, to adults responsible for the care of a child(ren). It is a means-tested benefit. Only households on low incomes can receive tax credits.

Claimant
An unemployed person who is in receipt of jobseekers' allowance and other welfare benefits e.g. employment support allowance, housing benefit or local housing allowance, child benefit, child tax credit.

Conditionality
The activities that claimants need to undertake to receive a particular benefit. For example, claimants must work at least 16 hours per week, as a single person, or 24 hours a week, as a couple, to become exempt from the benefit cap.

Dependent Child
A person aged 0 to 16 years old or a person aged 17 to 18 who is in full-time education or training.

Eligible rent
Eligible rent is the amount of rent that a social housing tenant pays excluding service charges such as water, support services etc.

Gatekeeping
Term used to describe informal criteria applied by LAs to prevent homeless applicants from accessing the services (e.g. temporary accommodation) that they would otherwise be entitled to.

Homeless Application or Assessment Process
Where individuals seek homeless assistance, their housing needs must be assessed by a LA in line with homelessness law to determine which housing service(s) they are entitled to.

Homeless duty (or full housing duty)
Under Housing Act 1996 (as amended by Homelessness Act 2002), a LA owes a 'homeless duty' to an applicant and his household if he is assessed as being eligible for assistance, homeless and fall within a specified priority need group e.g. dependent children, did not become homeless intentionally and has a local connection to the district.

Homelessness
The law states that homelessness occurs if:
- there is no accommodation that the applicant is permitted to occupy, for example, at the end of a tenancy and/or
- it is unreasonable to continue to occupy accommodation, for example, affordability reasons or if notice has been served

However, many people who are homeless live with families or friends under temporary arrangements.

Homelessness Prevention
Pre-emptive action taken by LAs to provide assistance to an applicant at risk of imminent homelessness. This can be done in two ways – providing financial assistance to allow the applicant to remain in their existing accommodation or assisting the applicant to obtain alternative accommodation with a tenancy of at least 12 months' duration.

Homelessness Reduction Act 2017
Imposes new duties on LAs to help prevent homelessness of all families and single people who are eligible for assistance and threatened with homelessness, regardless of their priority need status.

Housing Act 1996
Most important contemporary housing legislation that was amended by the Homelessness Act 2002. The main homelessness duties are contained in Part 7 of this Act. A significant amendment in 2002 was the removal of the two-year limit on

temporary accommodation provision for statutorily homeless applicants and their families. This re-instatement of LAs' homelessness duties strengthened the housing safety net for homeless people.

Housing benefit
Welfare payment designed to help eligible social tenants pay their rent. The amount they are awarded depends on their income and other circumstances e.g. if there are adult children in the household. Adult children are required to contribute to the rent and so deductions are made to social tenants' housing benefit entitlements to take that into account. Similar criterion applies to benefit recipients in the private rented sector (see Local Housing Allowance below).

In-work poverty
People who are working, or live with someone who works, and have a household income below the poverty threshold (less than 60% of the median household income in the UK).

Local Authority
Organisation headed by local councillors that provides local services and set municipal strategies. Local housing authorities (or homeless departments) are the departments within local authorities that carry out statutory housing functions including housing options and advice, homelessness assessment and accommodation services. These obligations are retained by a local authority regardless of whether it performs these duties itself or contracts them out to third parties.

Local Housing Allowance
A simplified housing benefit regime, introduced in 2008, to improve transparency for private sector tenants on benefits and low income. Local Housing Allowance is based on a household's bedroom need and the allowance rates vary according to the broad rental market area set by the Valuation Office Agency. In 2010, reforms were introduced, the two most important of which were: a) reduction of the rate level from 50th to 30th percentile of local market rents, and; b) removal of the 5-bedroom rate.

London Councils
The local government association for Greater London which acts as a think tank and lobbying organisation as well as providing some services directly, that allows multiple local authorities to pool responsibility and resources.

Overcrowding
Defined by the former DCLG as a household lacking one or more bedrooms compared to the number of rooms needed for the size and composition of that household.

Private Rented Accommodation
Property rented from a landlord other than a social landlord. This type of tenure gives homeseekers the freedom to choose the type and location of property but can be significantly more expensive than social housing.

Right to Buy
The Housing Act 1980 gave secure tenants of local authorities the right to buy (RTB) their homes at a price lower than the full market value, after a minimum period of residence – currently three years.

Sanction
Benefit reduction or suspension as a result of claimants not fulfilling the conditions of a benefit award. For example, people in receipt of Jobseeker's Allowance (JSA) or employment support allowance (work component) will have their housing-related benefits reduced if they fail to find and keep employment.

Settled Accommodation
Any medium- to long-term tenancy where the occupier has security of tenure, that is, verbal or written tenancy for at least twelve months' duration.

Social rented housing
Housing stock owned by local authorities and housing associations for which guideline target rents are determined through the national rent regime. Most local authorities are landlords of social rented housing, but the stock levels vary widely.

Stamp duty land tax
A levy on the purchase of property or land over a certain price in England, Wales and Northern Ireland.

Temporary Accommodation
Housing provided to homeless people whilst their homeless application is being assessed or has been assessed and a full housing duty accepted by the LA. Also known as 'interim' or 'emergency' accommodation, it can include bed and breakfast accommodation, hostels, bedsits, flats or houses.

Tenancy agreement
A verbal or written contract between a landlord and tenant. The tenant and the landlord both have rights and obligations for the duration of the tenancy.

Valuation Office Agency
Agency of Her Majesty's Revenue and Customs that is responsible for setting the local housing allowance rates for benefit claimants in the private rented sector. This agency also compiles the market rent levels nationally.

Universal Credit
A new single monthly payment that is being rolled out for all welfare benefit claimants. It replaces several benefits, including child benefit, tax credits, income support, JSA, employment support allowance (ESA), local housing allowance and housing benefit.

Working Tax Credits
Benefit payments to working households on a low income to augment their wages.

Table of Contents

Chapter 1 - Introduction

1. Introduction

The enactment of the Welfare Reform Act 2012 paved the way for wide-ranging changes to means-tested benefits in England. The changes included cuts, caps, freezes to the amounts payable, and extended conditionality, which the then Work and Pensions Secretary Iain Duncan Smith declared to be the 'biggest reforms for 60 years' (DWP, 2012). One element of the reforms, the benefit cap policy, limits the amount of housing benefits or local housing allowance that unemployed benefit recipients can receive. This is in addition to freezes and discontinuations of certain benefits which have had a profound impact on tens of thousands of benefit recipients' ability to meet their housing costs and could potentially lead to them becoming homeless. As a result, benefit recipients affected by the benefit cap are more likely to interact with officials in local housing departments as they seek solutions to their housing problems. This study is about those officials and how they carry out their job in providing housing assistance to affected benefit recipients.

1.1. Research Questions

Following the Welfare Reform Act 2012, housing benefits or local housing allowances have gone from being paid, in full, as an entitlement or right of legal citizenship to all eligible citizens who are struggling to meet their housings costs, to being partly awarded, as a conditional benefit, to unemployed citizens. However, the fact central to this study is that, if a benefit recipient becomes homeless as a result of the reduction in their benefits in line with the benefit cap limit, he can still obtain full housing assistance from the local housing authority under homelessness law. In other words, even though the curtailing of housing benefit or local housing allowance

payments is meant to change recipients' work-seeking and keeping behaviour by 'punishing' them for being unemployed, the benefit recipients' status as being eligible for housing assistance is protected by a more powerful legislation than the benefit cap policy, the Housing Act 1996, which is the main homelessness legislation in England.

The Housing Act 1996 (hereafter referred to as 'the 1996 Act') imposes certain housing duties on local housing authorities (LAs) towards people who are eligible for homelessness assistance. Apart from determining what duty may be owed towards homeless people, LAs also have other statutory obligations with regard to discharging any duty owed or accepted towards homeless people. One of these is to ensure that any accommodation provided in fulfilment of the statutory duty accepted must be suitable to the needs of every member of the homeless person's household. However, as accommodation allocation decisions in many parts of London and South East of England are made in the context of restricted availability and very high cost of local accommodation, the dilemma that local housing officials face is how to manage the reality of benefit recipients' reduced housing benefits or local housing allowances alongside the legal obligations to provide all statutorily homeless people with 'suitable' housing, which in this study refers to location and affordability. Therefore, the benefit cap policy has greatly complicated the legal and administrative environment for local housing officials. In addition, there have been savage reductions in central government funding to LAs since 2010. These factors mean that how LAs implement the benefit cap policy has become a significant and complex practical issue.

I argue that the implementation of the policy has increased pressures on, and created legal contradictions for, local housing officials as they attempt to fulfil the LA's statutory obligations. This is because logic tells us that, where benefit recipients

16

have been able to meet their housing costs themselves under the old welfare system (even in the face of tight budgets), any shift in their income stream caused by the benefit cap will have a knock-on effect on their ability to meet future housing costs. Therefore, (threats of) homelessness will become inevitable. Furthermore, the context in which implementation has been organised, administered and delivered by local housing officials amounts to another form of disciplining the benefit recipients, even if statutory duties are eventually performed. Thus, the apparent incompatibility of the benefit cap policy (design and intent) with homelessness law is something that local housing officials, who operationalise the benefit cap policy, have to contend with. In this context, the design and intent of the benefit cap policy, especially its emphasis on work, has given rise to a number of problematic incompatibilities. These tensions surround: judicial and local interpretations of legislation; the complexity of functions and boundaries between local and central government responsibilities; combining rights to housing with paternalistic welfare provisions; and the scope of such housing assistance, that is, whether it should be limited or open-ended to the LA. In view of these problems, the principal research question that this study sought to answer was:

- How and why have the practices of housing professionals in London <u>changed</u> following the introduction of the benefit cap policy?

In addition to the main research question, there were three further sub-questions that shaped the research. These were:

- How have LAs interpreted the DHP requirements and homelessness legislation in light of the benefit cap policy?
- How and why have the factors that affect how frontline housing professionals make decisions changed following the introduction of the benefit cap policy?
- How and why has implementation of the benefit cap policy influenced housing professionals' identities?

The research was intended to provide an empirical account of the 'street-level' realities of the policy. To answer the first sub-question, I conducted an in-depth analysis of key policy documents, the results of which are reported on in Chapter Five. To answer the remaining two sub-questions, I conducted interviews with local housing officials in three local authorities in London. The interviews focused on what the implementation of the benefit cap policy has meant for the local housing officials, and how they have navigated the new policy implementation landscape. In the interviews I explored, amongst other topics, the increasing costs of housing, challenges in securing suitable accommodation, individual and group behaviour, the power dynamics between local housing officials and benefit recipients and the latter's resistance to local housing officials' discipline and control, the issues surrounding organisational image, their communication patterns, their experiences of leadership, managerial work and intra-organisational collaboration. Chapters Six to Eight provide an analytical account of this new empirical evidence.

The aim of the research was *not* to evaluate the effectiveness of the benefit cap policy in changing the behaviour of benefit recipients or in dealing with causes and problems associated with homelessness. Rather, the study furthers the discipline of social policy by contributing to our understanding of the policy implementation process, using the practices of local housing officials, post-benefit cap, as case studies. To best understand the implementation 'black box', the analysis of both the documents and interviews drew on three theoretical concepts - *governance*, *welfare conditionality* and *street-level bureaucracy*. These ideas bring together the underlying principles of the research as they relate to the social policy agenda of the Coalition Government (2010-2015).

The concept of *Governance* is important to this study because it offers a fresh take on professional practice and illuminates the transformations in the administration of welfare (Fenger and Henman, 2006). It also rejuvenates attention on the practical side of welfare reform, without necessarily promoting a new Grand Theory (Alvesson, Ashcraft and Thomas, 2008). In this sense, the concept of *Governance* is not only useful in classifying various service provision models and their underlying service 'logics' and 'philosophies', it can also 'help to unravel the often hybrid or contradictory nature of the service provision models in local practice' (van Berkel and Borghi, 2008:335)

The benefit cap policy is one of the most prominent forms of welfare conditionality and this directed my attention to its reality as a power-laden site for the production of new or renewed forms of social control. Conditionality principles have always been a feature of the British welfare state, requiring citizens to contribute to the social fund in return for calling on it when social assistance is needed in the future. However, housing assistance is not part of the traditional social fund or welfare state and so making the link to responsible behaviour is not at all straightforward and it is this complexity of the policy implementation that made the concept of *welfare conditionality* pertinent to the study. Questions about the relationship between citizens' rights and responsibilities, and what the practice implications are for LAs, as statutory agencies, are all issues that needed to be explored. Employing the concept of *welfare conditionality* thus reveals some of the inherent contradiction at the heart of the Conservative-led welfare reform project.

Local housing officials are classic street-level bureaucrats and were therefore suitable for the study. According to Lipsky (1980), street level bureaucrats need discretion, whether in the form of initiatives or entrepreneurship, for policy to work.

In this context, discretion occurs in a 'context in which any policy should be applied and understood alongside other policies and has to be tailored to available resources and circumstances' (Evans, 2011). And where complex tasks require the elaboration of rules, guidelines, or instructions, discretion becomes inevitable (Lipsky, 1980:15). Yet, discretion can be difficult to control, even where control is necessary.

The terminology surrounding housing and welfare policy can be confusing. So, in this thesis, the benefit cap policy is referred to as 'the policy'; housing benefits or local housing allowances are referred to as 'housing benefits'; officials in local housing departments are referred to as 'housing professionals'; welfare benefit recipients are referred to as 'recipients'; and, unemployed, benefit-capped welfare benefit recipients who have contacted the LAs for homelessness provision or other housing assistance are referred to as 'applicants'. London includes the Greater London boroughs.

1.2. Why study housing professionals

Welfare reform does not only affect the individual social protections afforded by the 'traditional' welfare state; it also affects local organisational practices including bureaucratic administration and professionalism (Clarke and Newman, 1997). According to Borghi and van Berkel (2007), welfare reform:

> … affect both the 'welfare' (programmatic characteristics of social policies and welfare state arrangements) and the 'state' (modes of governance underlying the administration, management and organisation of these policies and arrangements) dimensions of the welfare state (p.84).

In the vein, this study looked at the 'state' aspect of the welfare state and the role of housing professionals in the implementation process. The decision to focus on housing professionals was a significant one as they have a key role to play in

(re)interpreting the policy through their day-to-day practices of administration, management and organisation (McKee, 2015). Within the policy implementation, housing professionals assume a unique position. They are at the contested 'coalface' as they mediate between the state and citizen, in which capacity they, potentially, have the power to shape recipients' conduct. However, our understanding of the ways they adopt this role, or what this positioning means in practice as it interacts with a work-related policy, have not been fully developed within the housing policy field. A reason for this apparent oversight, according to Jacobs and Manzi (2000), has been the attraction of positivist policy research, such as evidence-based research, and the belief that housing provision is an administrative task that is 'self-explanatory and uncontested' (Casey and Allen, 2004 cited in Casey, 2008:763). One of the original aspects of this study is to look at the role of individuals, as opposed to institutions, in the policy implementation process. It achieves this sociologically, by analysing how housing professionals construct their professional identities. In turn, understanding housing professionals' practices and the ways in which they contest and question 'the identities that are offered to, or imposed on, them by government' (Barnes and Prior 2009:3) provides a unique opportunity to critically examine the policy process.

Moreover, housing professionals play a key role in the day-to-day implementation of the policy because of their knowledge of regulations and legislation, their scope for exercising discretion over various forms of resources for housing support and assistance, and their daily contact with the recipients. As such, housing professionals do not only organise accommodation for people who require it or defer to central and local policy and regulation. They are also, as suggested by Lipsky (1980), reflexive in their roles. For, if welfare reform is to be implemented as government intends, housing professionals must understand the new rules, comply

with them, and administer them in line with the policy intents (Lipsky, 1980). This makes them the prime source for eliciting information on the process and impact of the policy implementation.

Given these points, I agree with Nethercote, (2014) that the focus of research on housing policy should be broadened to consider 'the subjectivities of local actors in these new governance landscapes' (p.1049) Specifically, the ways that housing professionals exercise their discretion at the street level whilst 'engaging in the moral and practical deliberations of how to act in their day-to-day interactions with recipients' (Prior and Barnes, 2011:267) is worth researching. Inspired by Lipsky's (1980) street-level bureaucracy theory, I argue that housing professionals mediate and shape everyday reality for the recipients at the street level. Therefore, how they interpret the policy alongside other legislation is essential for a full understanding of the policy's impact during implementation.

Give these realities, it is also important to understand the changing role of housing professionals, post-welfare reform. That is, how they cope with their evolving 'public' role, at a time when they have to take on 'new roles of engaging, managing, and disciplining the public' (Newman, 2010:271). Housing professionals were thus used in this research as key informants given their expertise and their role as the (street-level) implementers of the policy, their knowledge of the gaps in the service, and their perceptions of the organisational landscape within which they operated. With this in mind, the research improves our understanding of how housing professionals operate in the new spaces of housing governance.

Differently to most research that deals with the role of frontline implementers of public policy in recognition of their significant direct interactions with service users

and service providers, this study incorporates the less-discussed and researched group, mid-level bureaucrats. Their position as middle managers between the top-level and the frontline bureaucracies means they occupy an important position in determining the mode of implementation and allocation of resources. Gaining insight into the varying responsibilities and positions of housing professionals also provided a perspective that complements the existing client-focused research on the users of housing services.

1.3. Why the benefit cap policy?

The benefit cap policy started in April 2013 as a pilot in four local authorities in London. The aims of the policy were to:

- Secure the economic well-being of the country by reducing spending on benefits and encouraging positive behavioural changes;

- Impose a reasonable limit on the total amount which a household can receive in welfare benefits to promote a fair and healthy society and maintain public confidence in the welfare system; and

- Incentivise work to reduce poverty and increase economic prosperity

    (source: https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/inquiries/parliament-2017/benefit-cap-17-19/).

The former Work and Pensions Secretary, Iain Duncan Smith, who spear-headed the policy, described the rationale behind the development of the policy in these words:

> We will always be there to support those who need help, but the days of blank cheque benefits are over, and the benefit cap is a key part of this. We need a system that no longer traps people in a cycle of dependency and is fair for the hardworking taxpayers who fund it. … We are ensuring it is there as a safety net for those who need it but that no-one can claim more than the average household earns in work. (DWP Press release, National introduction of benefit cap begins, 15 July 2013)

The following year, after the 'successful' roll out of the cap across the country, Duncan Smith reiterated:

> ...the benefit cap is...another example of striking cultural change…ending the something for nothing entitlement and returning fairness to the system. Th[e] [previous] system wasn't fair on hardworking taxpayers, paying out ever-increasing amounts to sustain others in lifestyles they could barely dream of affording themselves…But importantly it has not been fair on benefit recipients themselves. How many of us would want to live trapped in a system where it was more worthwhile sitting on benefits than going to work. (Welfare Speech - A Welfare State Fit for the 21st Century by Duncan Smith, January 2014)

These quotes reveal the ideological underpinnings of the policy which will be further explored in Chapter 5. They demonstrate that it was believed that the generosity of the welfare benefit system was leading to the inertia and dependence of some recipients. This belief presupposes that the causes of worklessness are moral and psychological in nature and are related to recipients' lifestyle choices. The policy, in other words, looks to the internal structure of individuals to explain their welfare dependence, as opposed to the social or economic context that recipients inhabit. The policy is, therefore, designed to reduce welfare dependency by creating the 'carrot' of financial incentives and the 'stick' of sanctions to encourage recipients to prepare for, and seek, employment instead (Edmiston, Patrick and Garthwaite, 2017).

Originally, the amount of the benefit cap was set by reference to the earnings of a hypothetical 'average household', but the cap has since been lowered. The level of the benefit cap is set based on 'fairness' to taxpayers, not the needs of recipients. Although the policy is intended to change recipients' behaviour, that is, seeking paid work to be financially better off, it also recognises that, due to the high costs of living, it is not realistic for all workers to entirely support themselves, and recipients who fulfil their social citizenship obligation through work may still have to rely on top-up benefits. As such, the rationale for the policy fits the Conservative Party's broader ideological agenda. But this political ideology is challenged by the widespread belief,

among recipients, that the LA 'has a duty' to house them which undermines the effectiveness of the policy to change recipients' behaviour towards employment. Central to this counter-effect is the legalistic basis of homelessness provision in England, especially towards recipients with dependent children, who are the subjects of this study.

1.4. Why London

Several considerations make London both interesting and significant for analytic and research purposes. London offered an excellent setting to examine the policy implementation at the local level. Government statistics show that, compared to the rest of England, London has the highest housing costs, which affects housing affordability. Therefore, it is the region most impacted by the policy, given that it is the housing benefit element of recipients' overall welfare benefits that is curtailed. Official statistics confirmed that the policy has had a disproportionate impact in London. Cumulative data published by the DWP for the period April 2013 to February 2017 show that, out of 133,802 recipients who had had their benefits capped nationwide, 44,866 were in London. Of this figure, 40,792 are recipients with dependent children. Moreover, the capped population in London had the highest amount of shortfall than any other region. For example, 41% of recipients had seen their incomes reduced by between £50 to over £400 per week. This figure is directly related to the number of children in the recipients' household, with larger families being hit hardest by the cap.

I also thought it likely that, in the context of its exceptionally severe housing shortage, the policy would be applied differently in London compared to the rest of England. One difference might involve the stringency with which London LAs apply sanctions on recipients. Another outcome might be the extent to which London LAs

look further afield to provide affected recipients, who become homeless, with suitable accommodation to discharge statutory housing duties.

Moreover, as a research site, London lent itself to the comparative social policy methodologies frequently used for cross-national studies. What the 33 London boroughs all have in common is the same national legislative framework which they must abide by; they also share national culture, political traditions, and the government and judicial systems. This is where the similarities end. London's local authorities have significant variations in local political or organisational culture, structures, instruments, and values. These I thought would likely be important variables in influencing how the national-level policy was implemented. This exploration uncovered information which showed that the local implementation of the policy made possible the inconsistencies in service provision, akin to postcode lottery. In this context, London may have developed not one, but 33 models of housing provision or assistance. Thus, London provided an ideal setting for understanding the range of housing governance in situations where local political willingness to act is at odds with public policy intents.

1.5. Scope and assumptions of the research

In this study, 'implementation' refers to the support that is provided to the cap-affected recipients to comply with the policy requirements, *or* the assistance provided (e.g. Discretionary Housing Payments awards) to prevent them from becoming homeless where the reduction in their income threatens their housing stability *or* the housing duties owed to the applicants when preventative measures fail, and they are evicted. The population of interest are those recipients who have been classified by the DWP officials as fit to work, *and* live in social or private rented accommodation, *and* have dependent children *and* have had their benefits capped.

26

Other housing-related welfare reforms were outside of the scope of this study, such as the removal of the spare room subsidy (the 'bedroom tax') and the local housing allowance cap. The bedroom tax reduces social housing tenants' housing benefit entitlements if they are deemed to have one or more bedrooms than their household needs. Local housing allowance caps are applied to all welfare benefit recipients living in private rented accommodation. The maximum housing allowance that these recipients could receive would not exceed the rate for a four-bedroom property, regardless of the family size. Still, it is conceivable that some recipients may be affected by these changes in addition to the benefit cap.

Furthermore, given the protections afforded by the homelessness legislation, this study assumes that the recipients would have priority for re-housing in the event of homelessness because they have dependent children. All things being equal, it is also assumed that they will be deemed 'unintentionally homeless' since the loss of their home was because of the capping of their welfare benefits. Consequently, the LAs would have a full duty to secure that suitable accommodation is provided to them (an in-depth analysis of the homelessness arrangements in England will be discussed in the next chapter).

Yet, LAs in London provide housing assistance against the backdrop of a particularly challenging housing market. For example, council-owned housing is in short supply, so LAs largely rely on the private sector, with its market vagaries, to discharge statutory housing duties owed to homeless applicants. These structural problems in the supply of housing emanate, partly, from various historical pro-market housing policies such as: the Right to Buy (which gives sitting social tenants the option to buy their homes at significant discounts); Large-Scale Voluntary Transfers of council social housing stock to housing associations; and the barriers imposed on LAs

which prevented them from building social housing for local people (these points will be elaborated on in the next chapter). Although I was cognisant of these wider inter-related housing policies, I did not seek to engage with these other policies, but rather treated them as context to the problem of the local implementation of the policy.

1.6. Contributions of the study

This research matters because statutory homelessness among families with dependent children is a significant social problem, especially in London. This is evidenced by the high number of families in temporary accommodation (TA), which is the most common and immediate LA response to people's housing crises. Figures provided by the former Department for Communities and Local Government (DCLG) for the period October to December 2016 show that 75,740 households were homeless in England and staying in TA because they have a priority need for housing assistance. Of this figure, 54,170 (72%) were in London (DCLG, 2017). The same source revealed that back in 2010, the number of homeless families in TA nationally had been 63% lower at 48,010. Specifically, of the LAs researched for this study, each had between 1,000 and 2,300 households in TA in March 2016, the time the research data was collected. Whilst these figures do not imply that all the people in TA were affected by the benefit cap, they, nonetheless, demonstrate the scale of the housing challenge that LAs in London were facing.

Another dimension to the problem of homelessness among families with dependent children is the displacement of homeless people to other LA areas as a result of local housing scarcity which threatens community cohesion and psychological wellbeing. Figures from DCLG for December 2016 also show that, of the 54,170 London households in TA, 19,860 were accommodated outside of their

normal borough of residence. This was 37% of the total, an increase of 14% from the same date the previous year.

Although, the above evidence is useful in showing the impact of neo-liberal social policy on London LAs, Mead (2004) suggests that, for 'research to have more influence, it must offer more governmental content. Especially, inquiry should rely less on the statistical analysis of databases and more on field observation of how programmes operate' (p. 1). This research is thus less on statistics and more on the sociological and administrative aspects of the policy implementation for housing professionals. This is because there is a need to enhance our understanding of the perceptions and experiences of the street-level implementers of welfare reform policies (Fletcher and Flint, 2018).

There are several contributions that this study makes to the field of social policy and sociology. Firstly, this study is original as it presents new empirical data on the LAs' management of statutory housing provision towards the applicants. Being a housing practitioner myself, I was able to gain privileged access to interviewees. From this point of view, the study also gives a unique insider account of policy implementation from the professionals' point of view.

In terms of theory, this study drew on perspectives from psychological, economic, legal and sociological scholarship. However, its chief theoretical contributions are to the academic field of social policy. Firstly, this research contributes to advancing the theoretical social policy literatures on welfare reform. The existing research on the enactment of welfare reform policies in England is focused on certain aspects, mainly: social justice investigations on the potential of welfare reform to increase recipients' poverty; the effects of the reforms on

recipients' financial wellbeing; and the barriers to getting people to change their behaviour and move from welfare to work. But, this study contributes to the limited literature that exists in England on the tense relationship between the benefit conditionality embedded in the welfare reforms and other parts of the contemporary welfare system where eligibility is based on need rather than socio-economic or moral behaviours. However, little, if any, academic research done on this topic, to date, has considered the context of homelessness legislation and welfare reform policies.

Secondly, this research contributes to advancing the theoretical social policy literatures on the policy process. As far as I am aware, there is an absence of research on how policy implementation takes place within local agencies such as LAs. I add to the existing literature on how policy implementation is incorporated into local practices and I am the first to demonstrate what is required of housing professionals. Moreover, little attention had been paid by analysts to the issues of governance in the study of public policy reforms and welfare state transformation processes. The paucity of research in this area means that an analytical understanding of both 'formal' *and* 'operational' policies (Hill and Hupe, 2002; van Berkel and de Graaf, 2007) is lacking. Formal policy denotes the substance of public policies, that is, the contents or the 'what' of policies and services which have been extensively researched. On the other hand, far less is known about operational policy - the organisation and management of local policymaking and policy delivery processes. This includes policy administration, what actors are involved, what their roles and responsibilities are, and how the relationships between them are structured, that is, the 'how' of policies and services. In addition, my findings suggest an 'organic' understanding of the policy as it is variously interpreted and 'performed' by the housing professionals who are

tasked with its implementation, but who also bring their own expertise, experiences, and understandings to bear on the practices (Watkins, 2006:7). Yet, without such reflexivity, I concur with scholars such as Kessl (2009), who believe that 'professional discretion may be in danger of being substituted with technical rationalities that are only geared towards finding ways to achieve predetermined goals' (p.443). In the context of homelessness legislation and policies, there is little, if any, academic research published on this aspect of the policy process to date.

Thirdly, this research contributes to our understanding of the implications of the policy. As far as I am aware, there is a notable absence of empirical research on how statutory homelessness provision is applied to cap-affected recipients within London or, indeed, England. At the time the data collection for this study took place, the policy had barely been rolled out which means that there was limited literature on its implementation effects for LAs. The research also specifies the impacts that the policy has for housing professionals in London and the legal and financial implications for LAs, which influence the ways that housing professionals carry out their job.

1.7. Structure of the thesis

In this chapter, I have outlined the research questions and the arguments for this study and have justified the significance, contributions, and choice of research frames. The remainder of the thesis is divided into eight chapters. Chapter Two contextualises the policy and links it to the contemporary provision of statutory homelessness assistance (and other financial support to prevent homelessness), with its complexities and interdependencies for LAs. Chapter Three examines the existing debates and literatures from political science, public administration, and behaviour economics disciplines as they relate to policy implementation. This framework

provides an interdisciplinary critique of the policy implementation literature. An outline of the qualitative research methods used - document analysis and individual interviews - is presented in Chapter Four. On the basis that the implementation strategies and their effects are manifest most effectively at the local level, the methods described here seek to capture how housing professionals practice and experience the effects of the policy against LAs' own policies and, in particular, the technologies of agency.

The document analysis in Chapter Five offers a critical dissection of the political, social and economic drivers for the 'recalibration' (Ellison and Fenger, 2013:611) of the British welfare state and provides a critical examination of the core assumptions upon which the policy was developed. It also analyses other national and local policies that LAs use in the implementation of the policy. Chapters Six to Eight gives an analytical account of the empirical evidence collected from three LAs in London. The interview data were analysed within the interpretivist framework to understand how the policy implementation within a legalistic, homelessness environment impacts on the subjectivities and actions of housing professionals. Across the three LAs, the congruence between formal policy goals, organisational priorities, and operational goals from the perspectives of mid- and street-level bureaucrats were described and analysed. The final chapter summarises the findings of the research, provides answers to the research questions and highlights the implications of the policy implementation for LAs.

Chapter 2 – The Policy Context

2. Introduction

In this chapter, I outline the characteristics of the policy (what is it, who it applies to, and who is exempt), followed by the conditional and transitory support, in the form of DHP, that the recipients are offered to help them adjust to their reduced income. Thereafter, the legislative framework of homelessness provision in England is outlined including its intersection with the policy.

2.1. What is the Benefit Cap Policy?

The policy forms part of the Welfare Reform Act 2012 (hereafter referred to as "the 2012 Act") and is found at sections 96 and 97. According to s. 96(2) of the 2012 Act:

> applying a benefit cap to welfare benefits means securing that, where a single person's or couple's total entitlement to welfare benefits in respect of the reference period exceeds the relevant amount, their entitlement to welfare benefits in respect of any period of the same duration as the reference period is reduced by an amount up to or equalling the excess.

In other words, where the benefit receipts of 'fit and able' but unemployed individuals would exceed the cap limit, the housing benefits element of their overall entitlement would be reduced accordingly.

Section 96(6) of the 2012 Act also requires that the level of the cap be determined by reference to estimated average earnings which will be (re)set by the Secretary of State for Work and Pensions. This requirement gives the holder of this office broad discretion as to the level of the cap. Nevertheless, whilst the cap is referenced to average earnings, it does not follow that the cap would be set at the level of median wages. Therefore, this reference is only a benchmark above which the cap will not exceed.

To operationalise the policy, s.96 of the 2012 Act provides for a statutory instrument, the Benefit Cap (Housing Benefit) Regulations 2012, which amended the Housing Benefit Regulations 2006 (S.I. 2006/213) by inserting a new Part 8A. This provision gives housing benefit departments within local authorities the power to apply the cap to recipients' housing benefit entitlements. However, administration of the policy will eventually be transferred to the DWP as all benefits receivable by recipients will form a Universal Credit which will be paid out monthly instead of the current weekly or fortnightly payments.

At the time of the research, the cap was set at a national level of £500 per week for unemployed parents with dependent children, and at £350 per week for unemployed single adults. However, commencing November 2016, the cap was reduced to £442.31 and £296.35 respectively in London and their counterparts in the rest of the country receive the following: £384.62 for recipients with dependent children and £257.69 for single adults. These amounts include housing benefits, child benefit, child tax credit, Jobseekers' Allowance (JSA), incapacity benefit, income support, work support component of ESA, maternity allowance, severe disablement allowance, widowed parents' allowance and bereavement allowance. However, the cap calculation does not take into account council tax benefit, DHP awards, carers' allowance, war pensions and disability support component of ESA. Other benefits that are exempt from the cap calculation are Working Tax Credit (WTC) and disability living allowance/personal independence payment, the latter being a form of sickness benefit. Individuals who have moved into work can claim WTC to augment their wages but to qualify, they should be working at least 16 hours a week, if they are on national minimum wage or national living wage, and for couples, the minimum hours is 24. Still, some unemployed people are exempt from the cap if they had

worked for 50 out of the previous 52 weeks. They will have a 39-week 'grace period' from their last day of work, after which they will become subject to the cap. The changes brought about by the cap added to previous reforms that the Coalition Government had already made to the welfare benefits system (see Appendix 1).

2.1.1. Rolling Out of the Policy

The Coalition Government, in recognition of the seismic shift of the policy for the recipients and the implementing agencies, determined that a staggered roll-out was appropriate. The aim was to ensure that the policy worked, in practical terms, and to learn (and effect) any lessons that may become evident in the early stages of the policy implementation.

The roll out started in April 2013 in four London LAs that piloted the policy change - Bromley, Croydon, Enfield and Haringey. At the time, government statistics revealed that approximately 2,400 households were affected by the cap in these LAs. At the end of the pilot, national roll outs were made in two tranches. Smaller LAs, with less than 275 cap-affected recipients, formed the first tranche in July 2013 whilst the second tranche, with 276 cap-affected recipients and above (which the LAs in this study fell into), started in August 2013.

During the pilot phase, the Chartered Institute of Housing (hereafter, CIH) collaborated with Haringey Council to study the impact of the policy on some of the affected population. In October 2013, the CIH published their report. The report found that 747 recipients in Haringey had been affected by the policy in the four months from April to August 2013. Of these, 'only 74 (about 10%) had moved into work, while 11 of them had increased their hours sufficiently to avoid being capped' (CIH, 2013:15). Those recipients who were still out of work relied on supplementary financial assistance provided through the DHP.

The conclusions drawn were that two of the policy aims – saving money and encouraging people into work – appeared harder to achieve than expected. Additionally, it was evident that mass relocations of cap-affected recipients to cheaper parts of the country remained "visible on the horizon" once DHP was withdrawn (CIH, 2013:6). Nevertheless, the report noted that "there is evidence that the benefit cap is changing attitudes to work, but for many claimants there are still significant barriers" (CIH, 2013:5). Finally, and more importantly, the report noted that the policy has the capacity to impose greater demands, in terms of time and resources, on implementing agencies like LAs.

2.2. An Outline of the DHP Scheme

The DHP scheme was introduced by the New Labour government in 2001 through the Discretionary Financial Assistance Regulations 2001 (SI 2001/1167) to replace the Exceptional Hardship and Circumstances Payments. It was a small-scale scheme which gave LAs discretionary powers to provide financial assistance to eligible recipients to cover their rent and council tax liabilities. The scheme was revived and reconfigured by the Coalition Government in the wake of the welfare reform programme. Discretionary Housing Payment grants are allocated by the DWP to LAs according to their size and the impact of the welfare reform elements on the local population.

Local authorities can supplement the grant from their own local resources but this top-up amount cannot exceed one hundred and fifty percent of the original DWP grant, as per the Discretionary Financial Assistance Regulations 2001, This regulation also stipulates that the fund can only be disbursed for recipients' housing costs and that awards could not exceed the recipients' eligible rent, that is, the contractual rent excluding any support or utility charges. Apart from this stipulation

and other general guidance issued by the DWP on the criteria for making an award, LAs have considerable flexibility to distribute the grant, although they are still bound by the general principles of administrative law. The discretion that the regulation thus vests on housing professionals make them prime agents of social control or prone to behaving much like parents would towards children: 'supervising, educating, looking after, punishing and rewarding them' (Saugeres, 2000:590).

Given that DHP awards are not taken into account when calculating the cap limit, this income source provides an important source of relief to the recipients. Nevertheless, the levels of the grant have fluctuated over the years and the recent increase in 2016/17 was in recognition of the impacts of the reduced cap levels that became operational in November 2016 (see Table 1 below). Yet, it is important to realise that the DHP allocations towards the welfare reform programme are set to diminish by the year 2020.

Table 1 – DHP Grant Allocations in England

Year	National DHP Allocation (England) £m	Allocation to London LAs £m	Change in Annual Allocation in London 2013-2017	Total Annual Expenditure by LAs in London £m	Top up Amount by LAs in London £m
2013-2014	139.5	56.55	-	55.25	-
2014-2015	141.88	51.61	-4.94	52.1	0.49
2015-2016	105	33.28	-18.33	34.9	1.62
2016-2017	127	39.2	5.92	39.5	0.3

Source: https://www.gov.uk/government/collections/discretionary-housing-payments-statistics

As Table 1 shows, London local authorities received a substantial amount of DHP grant which reflects the extent to which the region has been affected by the welfare reform policies compared to other English regions. Therefore, the availability of DHPs to some recipients and their families is the difference between being made homeless immediately *or* them having the opportunity to seek cheaper alternative

accommodation *or* the prevention of rent arrears that could lead to the loss of their home.

2.3. The Homelessness Legislation

The multi-faceted nature of the policy implementation meant that, on the ground, the policy came to permeate a number of areas in people's lives (e.g. housing, work, social relations, education, health, personal finance). I highlight below the main homelessness legislative framework, as contained in Part 7 of Housing Act 1996 (as amended by the Homelessness Act 2002) (hereafter referred to as "the 1996 Act"), which recipients turn to when the policy impinges on their housing security.

2.3.1. Definition and Causes of Homelessness

In relation to the policy implementation and for the purposes of this study, the concept of homelessness will be limited to a person's legal right to occupy an accommodation. Legal (or statutory) homelessness (in contrast to rough sleeping where individuals are already 'roofless') is defined in Section 175 of the 1996 Act thus:

> (1) A person is homeless if he has no accommodation available for his occupation, in the United Kingdom or elsewhere, which he –
>   a. is entitled to occupy by virtue of an interest in it or by virtue of an order of a court
> (2) A person shall not be treated as having accommodation unless it is accommodation which it would be reasonable for him to continue to occupy
> (3) A person is threatened with homelessness if it is likely that he will become homeless within 28 days

This legislative prescription for homelessness determination is fairly exhaustive. However, a person who has been provided with TA is still considered legally homeless because that type of accommodation only alleviates the homeless person's immediate housing crisis and is therefore not settled accommodation.

While there are several critical factors (e.g. individual, social, political, and physical factors) that contribute to homelessness, the cost of accommodation in London is the main cause of contemporary homelessness and, for those who are affected by the benefit cap, the gap between housing costs and available resources increases the risks of homelessness even further. Having said that, housing affordability is not the only immediate cause of homelessness. Other reasons may range from no-fault eviction, that is, the landlord simply requesting the property back, social change factors, flood and fire damage, or anti-social behaviour etc. Homelessness is therefore linked to the combined effects of poverty, inadequate income, unaffordable housing, lack of meaningful employment opportunities, inadequate welfare benefits and urban change. These factors explain some of the causes, and by implication, the practical solutions required for a comprehensive, multi-dimensional analyses of homelessness which goes beyond single-factor causal explanations (O'Reilly-Fleming, 1993). I will return to causes of homelessness later in this thesis.

2.3.2. Provisions for Homelessness Assistance in England

Homelessness legislation is implicated in the implementation of the policy because it is the recipients' housing benefit, *ergo* their housing security, that is affected. As a matter of fact, in implementing the policy, housing professionals are also implementing homelessness law. By international comparison, homelessness law in England is unique, in that, it provides "'enforceable' ('justiciable') legal rights, that is, rights which courts of law will enforce on behalf of individuals, as a principal mechanism of 'empowering' homeless households and ensuring that their housing need is met" (Fitzpatrick and Stephens 2007:57). This right to housing assistance was originally enshrined in Chapter 48 of the Housing (Homeless Persons) Act 1977 but

was later watered down (and amended) in 1996 (and 2002). Nevertheless, the original principle of a statutory housing safety net remains.

According to homelessness law, LAs have a duty to assess homeless applications from individuals who are:

- 'legally' homeless (that is, someone who has no accommodation available to him/her or will be within 28 days)
- eligible to apply (in relation to their immigration status)
- in priority need (e.g. parent with dependent child(ren))

Individuals who meet all these criteria are owed an interim housing duty by the LA lasting six weeks whilst their homeless application is being assessed. During the assessment, there are another two key criteria that the LA must be satisfied the homeless person fulfils if they are to accept a full housing duty. These are, a) intentionality and, b) local connection to the LA districts or jurisdictions. Most homeless people have a local connection to the LA where the homeless application is made, and this usually makes accepting a duty a straightforward affair, as it is the last criterion to assess. However, assessment of the criterion of 'intentionality' is usually in contention as it concerns 'acts' and 'omissions' on the part of the applicant that led to their homelessness. This criterion will be analysed in Chapter 5.

Up until the passage of the 1996 Act, LAs' homelessness duties were mainly fulfilled through the allocation of social housing. The legislative changes in 1996 and 2002 meant that the LAs now have a responsibility to only provide a safety net in the form of TA to homeless people. However, the duty to accommodate statutorily homeless people (that is, those to whom the LA owes a full housing duty) remains until the LA can resettle them into suitable alternative accommodation (e.g. social housing or private rented sector), at which point, the housing duty formally accepted will be discharged.

Meanwhile, securing suitable TA for homeless people has increasingly challenged LAs' budgets. In her report, which was commissioned by London Councils (a cross-party organisation that campaigns on behalf of all LAs in London) to look into TA provision in London, Rugg (2016) concluded that, 'a perfect storm of market conditions and policy changes means that providing TA for homeless people and their families is becoming increasingly challenging for London councils' (p.41).

In light of the shortages in social housing, and to facilitate the discharge of the homelessness duty, the Localism Act 2011 (hereafter referred to as "the 2011 Act") makes provision for LAs to offer statutorily homeless people suitable alternative accommodation in the private sector, without seeking their prior consent. Crucially, refusal of any such offer could mean summary discharge of the housing duty previously accepted. This was a cultural shift for homeless applicants because, before the passage of the 2011 Act, they used to hold out in TA for social housing offers which, due to the chronic shortages, meant that their stay in TA sometimes lasted up to a decade.

Yet, in performing their statutory duties, LAs not only have to consider the 1996, 2002 and 2011 Acts, they also have to have regard to case law, codes of guidance and other statutory instruments and regulations when determining (and discharging) the housing duties owed to homeless people. Within this mix has been added the policy to which LAs must pay heed. Although the 'soft law documents' (Hunter *et al*, 2016) such as codes of guidance and regulations are not legally-binding and they give LAs discretionary decision-making powers, LAs must demonstrate that these have been taken into account when (service) decisions are made.

2.3.3. Impact of Housing Policy on Homelessness Provision

Whilst the duty to accommodate vulnerable homeless people rests with LAs, the changing political ideologies of both right- and left-wing governments have instituted policies that have severely impacted on local authorities' housing asset accumulation and retention, as well as their abilities to respond as statutory bodies. Since the 1980s, there has been a notable shift in the public ownership and management of social housing as successive governments sought to actively transform housing provision from a public to a private good. This shifting emphasis set in train the marketisation (or commodification) of social housing with two notable housing policy initiatives that have contributed to the divestment of public housing assets from local authority control.

Firstly, the Right to Buy (RTB) scheme, which was incorporated in the Housing Act 1980, forced local authorities to sell existing housing stock on the request of sitting tenants at heavily discounted rates. Carr and Cowan (2015) referred to this phenomenon as 'an unprecedented transfer of resources from the state to the citizen' (p.78). In sowing the seeds of social polarisation, the RTB saw the rise of the entrepreneurial, opportunistic social tenant who took advantage of the commodification of social housing to became homeowners as they sought to transform their status by joining the homeowning democracy (Hodkinson and Robbins, 2013). Prominent outcomes of such social polarisation were that the well-off tenants bought (and continue to buy) some of the best quality properties in prime locations from council-owned stock, some of which have ended up being offered as TA to their former landlords (that is, LAs) to house the poor (Beckett, 2015).

Secondly, the Large-Scale Voluntary Transfer of council-owned social housing stock to the housing association (charity) sector gained traction in the 1990s (Cloke,

Milbourne and Widdowfield, 2000). However, as it was a voluntary scheme, some local authorities did not divest of their assets which 'reflected the way in which local authorities mediate central government policies' (p.741). Instead, the local authorities created not-for-profit, arms-length management organisations that administered the stock whilst ownership remained with the local authorities. One of the LAs in the sample took advantage of this option and has, in the last few years, recovered management of its social housing stock, which exceeds 20,000 units. Nevertheless, it is important to realise that, prior to the transfers, council-owned social housing stocks were in very poor condition, a phenomenon that was, primarily, attributed to the diversion of the rents collected by the local authorities to the Housing Revenue Account held by central government. As such, the local authorities did not have use and full control of the rental income to maintain their housing stock. The housing portfolio transfers, therefore, meant that the upkeep and/or regeneration of the stock was no longer the government's responsibility and, in line with the neoliberal turn, the markets provided the capital that housing associations needed to complete any refurbishment or regeneration required.

The neoliberal turn introduced market principles into public service provision and was based on the notion that the markets or competition for public service contracts would have a positive impact on the efficiency and effectiveness of services, as well as the cost of such services (Peters and Pierre, 1998).

From this background, the suggestion is that shortage of public housing can have an influence on the policy implementation. Housing shortage can also be used to explain or justify local decisions and the 'treatment' that the recipients experienced.

2.4. Intersection of Homelessness Law and Benefit Cap Policy

The provision of homelessness assistance sits at the intersection of (potentially) competing and normative systems (for example, administrative, legal and discretionary) (Hunter, Bretherton and Johnsen, 2012), in which frontline housing professionals adopt gatekeeping roles and determine what kind and how much of housing assistance is provided to homeless people.

Meanwhile, where housing need arises as a result of the policy, the courts have determined, in *JS & Others v The Secretary of State for Work and Pensions [2013] EWHC 3350 (QB)*, that the complainants, JS & Others, could not be held responsible for the underlying causes of that need, that is, their failure to comply with the policy requirements of social citizenship or work requirements that the policy espouses (this point will be considered in more detail in later chapters). It is, thus, at the point where recipients approach the LAs for homeless assistance that the policy intersects with homelessness law (see Table 2 for a depiction).

Given the prominence of homelessness duties in the court's judgement, it suggests that most of the capped recipients would not be deemed intentionally homeless when they approach the LA for homeless assistance. Therefore, how LAs discharge the housing duties they will owe to the recipients will become the main issue for the policy implementation. Consequently, questions over suitability of accommodation provided, given recipients' reduced income, may then arise. Further analysis of the above case law will be given in Chapter 5.

2.5. Vignettes of Typical Benefit-Capped Cases

In this section, I present three case scenarios or vignettes which resemble the real-life circumstances of some of the recipients who seek housing assistance from

the LAs after the cap had been applied to their overall welfare benefit entitlements. These evocative descriptions were not used in the interviews and are only intended to evince recipients' situations, especially their different housing and social histories which may (not) have been taken into account during the policy formulation. By the same token, three vignettes could not possibly represent the diversity of cap-affected recipients who may need housing assistance from the LAs. However, the service experiences are similar for all cap-affected recipients as Table 2 below illustrates.

Vignette 1

Miriam, a single, unemployed mother of three children, aged 2, 4 and 6, had her benefits capped in September 2016. She lives in an outer London borough where she is renting a private three-bedroom property for £369.23 per week. Being benefit-capped, she could only receive a weekly maximum benefit of £500, which includes housing benefits. After deducting the other income benefits, which totalled £292.19, she will only receive £207.81 per week towards her local housing allowance. She has a weekly rent shortfall of about £161.42 and therefore risks being evicted. She has received a letter from the DWP informing her of the reduction in her benefits and advising her to contact the LA to seek advice and options regarding her housing situation.

Miriam wants to work but she cannot find affordable childcare. If she can get into work, depending on her wages, she might get Working Tax Credit as well as child benefit and child tax credit but, crucially, she will also receive her full local housing allowance entitlement of £303.00 per week. With the extra income from her wages and Working Tax Credit she would be able to top her rent up by £66.23 per week.

Vignette 2

Brooke and Liam, both in their late thirties and unemployed, live in a four-bed social housing property in an inner London borough, with their five children, all under 16 years of age. Their weekly benefit receipts, commencing November 2016, included joint JSA claim of £114.85, child benefit of £61.80 and child tax credit of £224.48, all of which totalled £401.13. They are left with

£41.17 towards their weekly social rent of £142.25. They, therefore, have a rent shortfall of £101.08 per week.

Brooke and Liam have never worked. They both left school without any qualifications. They also cannot read or write, and Liam has had short spells in prison. It is unlikely that they could move into work quickly or easily to ensure they avoid the cap on their benefits.

They have had some engagement with the welfare benefits officer who gave them advice about attending a job club where they would be assisted with gaining work skills and creating a CV. The welfare benefits officer has also shown them how to budget their limited resources to enable them to contribute towards their rent.

Vignette 3

Safia, a recently divorced woman, lives in a two-bed private rented flat in north east London with her two teenage girls. Before her divorce, her husband was the main breadwinner and she has always been a homemaker. Since her ex-husband was in employment, the tenancy (which started in 2006) was renewed each time as they always met their rent payment in full and on time. Safia had never claimed any out-of-work welfare benefits (except the universal child benefit) as her husband's wage was enough to meet their household's needs.

Safia is originally from Pakistan, speaks very little English and is illiterate. She relies on her children to read her mails and to provide interpretation at official meetings. Following her divorce, Safia became depressed and was put on anti-depressants but she was not considered disabled enough to be awarded Personal Independence Payments which would have exempted her from the cap.

Safia has applied for JSA and, along with child benefit and child tax credits, her weekly benefit entitlement is £225. Her weekly rent is £276.92 but, as the maximum local housing allowance she could receive as a benefit-capped recipient is £217.30, she would have a rent shortfall of £59.62 per week.

These vignettes simulate key features and situations of recipients affected by the policy. The contextual variation of recipients' journeys shows that more options are available in homelessness prevention, which is also cheaper, than allowing homelessness to occur, as depicted in Table 2. However, prevention is not always possible or cannot be sustained in the longer term. In this context, the vignettes and sample of the recipients' journey through the housing system, as in Table 2, are presented to build a picture in the readers' mind and to contribute to an understanding of the extent to which the recipients and LAs are impacted by the policy and/or to reflect LAs' responses.

In the next chapter, I will set out the current state of the literature and map out the concepts that I identified as being relevant to the study.

Table 2 – Recipients' Journey through the Housing Options Department

Negotiate rent reduction with landlord

Get a job (refer to job club for skills training and CV update)

Budgetting skills and debt management

DHP award granted to meet rent shortfall

Move to cheaper housing in/out of district

Homelessness prevention measures instituted

Notice to end tenancy issued to applicant

Applicant fails to engage with job club to update skills and improve chances of getting a job

DHP award ends. Another application made but no award given as previous conditions not met.

Homelessness prevention fails

Homeless application taken. Applicant placed in TA, in/out of district

Homeless application made

Chapter 3 – Literature Review

3. Introduction

Understanding how to implement complex interventions is an important issue, not only for policymakers and implementation agencies such as local housing authorities (LAs), but also for the officials who are tasked with operationalising policy at the street level. To develop a foundation for understanding, designing, predicting, and examining dynamic implementation processes, a theory or conceptual framework needs to be identified to guide the research (Pülzl and Treib, 2007). This chapter analyses the existing literature relating to policy implementation. Specifically, the literature on *governance* and *street-level bureaucracy,* which are both linked to a key construct from the welfare reform debate – *welfare conditionality,* make up the conceptual framework.

This framework integrates two inter-related perspectives that are not usually combined. Firstly, the study draws heavily on the policy implementation literature which distinguishes the analytical stance of theorists according to the direction of power. For example, 'bottom-up' theorists such as Elmore (1980), Lipsky (1980), Maynard-Moody and Musheno (2003) and Evans (2011) have focused on the role of frontline actors (and the behaviours of those actors), as the basis for understanding how policy is implemented at the street level and how frontline actors make sense of and act upon various policy messages. Secondly, the literature on *welfare conditionality*, although related to *governance*, is more concerned about contractualism and social citizenship with its complex interplay of rights and obligations of the target groups of welfare reform (Watts, Fitzpatrick, Bramley and Watkins, 2014). The concept of *welfare conditionality* is informed by ideas about agency and personal

responsibility, social obligations and primacy of work. This approach brings together several opposing perspectives which makes possible a more comprehensive account of the policy implementation.

The conceptual heart of the thesis is looking at the practices of housing professionals which is situated within SLB literature. But before discussing the literature on SLB, I am going to look at the concepts of *governance* and *welfare conditionality* and the changing ideologies towards the welfare state.

3.1. Governance

The concept of *governance* lies at the heart of much contemporary political scientific theory concerned with the role of the state and the implementation of public policy. The concept of governance was foregrounded in the political science literature by Rod Rhodes (1997) to depict the 'hollowing out' of the state which entails, amongst others, and the decentring of policy implementation to multiple actors.

According to Rhodes (2008), *governance* entails either (a) a descriptive metaphor of governments at work; or (b) a theory for analysing government policymaking; or (c) a prescription for reforming public management. The first depiction, which is applied in this thesis, has been used within public administration to portray situations in which multiple actors (or networks) collaborate in their work and/or coordinate resource allocation in policy implementation (Durose, 2009). The emphasis on multiple actors and their different positions in the implementation structure thus increases the stakes as each actor has their own agenda and strategies (Pollitt and Hupe, 2009).

Governance, in this context, also refers to the organisational relations of policy implementation (Brodkin, 2006; Fenger and Henman, 2006). In other words,

governance describes how policy works in practice at the local level (Stoker,1998). As an example of post-structuralist form of policy implementation (Henman, 2006), *governance* thus refocuses attention away from the political biases and statements, and stated objectives of formal policy, to the way in which policy is practised. This perspective highlights the domains which are not always discussed in policy analysis, such as the treatment of citizens and technologies of implementation. In this sense, conceiving 'welfare reform as governance reform' (Henman, 2006:19) reveals how policy is practiced at the street level.

The decentralisation of policy to the local environment for implementation emphasises local autonomy and the belief that local governments are more proficient at designing interventions that are appropriate to local circumstances (De Vrijes 2000) and reinforces the notions of central government being the 'steerers' of policy direction whilst local government ensures policy implementation (rowing) to achieve policy objectives (Osborne and Gaebler 1992).

For political science scholars such as Cairney (2009), *governance* represents the 'hollowing out' of the state which depicts a bottom-up position. By ceding some of its powers to the peripheries, Bevir, Rhodes and Weller (2003) too had argued that central government is purposely relinquishing its ability to act decisively which, in the end, will result in poor outcomes. Notwithstanding the decentralisation of powers and responsibilities to LAs and local communities, Beer (2012) believes that central government still wields a lot of power and can determine the amount and level of power that is shared/vested in third parties and to what extent this is done. Thus, rather than a complete 'hollowing out' of the state, Rhodes (2000) later argued that the role of the state has been redefined to allow for more diversity and enterprise. For example, the reliance of government on the private sector to build

affordable homes which may have had an impact on housing availability and affordability.

Van Berkel and de Graaf (2007) suggest that the 'principal-agent' problem is another persistent issue of *governance*. Whilst governments have moved away from strict rules and regulations that would ensure control of local policy implementation (presumably because of their inefficacy), van Berkel and de Graaf believe that governments have instead resorted to using financial incentives and evaluation techniques to achieve compliance. Some of the most popular mechanisms are the use of performance indicators and financial rewards for successful change in recipients' behaviour. As a result of these techniques, local actors align their priorities and decision-making with these performance indicators which are indirectly influenced by those of the principal, i.e. the government. From a logical point of view, this suggests that the principal still has 'control through regulation' with regard to local processes.

Even as the decentralisation of policy implementation has become common-place, van Berkel and de Graaf (2007) maintain that it is not without problems. Firstly, decentralising policy implementation to local actors has the potential to increase area differences and the treatment and service delivered to local people. Although this may be an intended consequence of decentralisation, it still raises the question of legitimacy as there are different area characteristics and differences in people's capacities, situations and needs. Secondly, local political preferences and organisational finances may also affect implementation. Thirdly, decentralisation raises issues about the meaning of rights, equality within the law and in citizenship, which are the end result of the decentralisation process that local people experience.

Despite such criticisms, Newman (2006) believes that (network) governance has its advantages especially as it 'more successfully delivers policy outcomes, by enabling actors to work across boundaries and by drawing many stakeholders into the process' (p.14). Moreover, the flexibility of network arrangements allows for complex issues to be dealt with more readily compared to other forms of policy implementation (e.g. top down hierarchical arrangements) which can be cumbersome and bureaucratic.

3.1.1. Governance of Welfare and Homelessness in a Housing Crisis

The Coalition Government's welfare reform programme entailed significant shifts in the provision of social protection. As already indicated, the policy focused on the morality and economics of providing 'unconditional' benefits to unemployed people who have been deemed fit for work by the DWP. At the same time, social protection has been improved for old age pensioners with the triple lock on pensions which guarantees that the basic state pension will rise annually by either a minimum of 2.5 per cent, or the rate of inflation, or average earnings growth, whichever is the greatest. Thus, the Coalition Government set out to target and justify 'welfare austerity' (MacLeavy, 2011) by appealing to the conscience and judgements of the general public and suggesting that younger citizens do not need as much support as the older population. In this regard, the policy abandoned the thitherto open-ended housing assistance commitment towards young and unemployed but able-bodied benefit recipients. Full housing awards thus became conditional on these recipients providing evidence of their work (search) activities.

The prominent social research group, *Policy in Practice* (2017/2018), conducted a longitudinal analysis on the impact of the four strands of the Coalition Government welfare reforms (Universal Credit, local housing allowance cap, spare room subsidy

and benefit cap) on the target populations. The project, commissioned by Trust for London and entitled *Low Income Londoners and Welfare Reform*, combined datasets of Housing Benefit and Council Tax records from 14 local authorities in London to track the impact of welfare reform on 444,000 low income households over two years.

The findings revealed that the average cap or reduction in housing benefits was £72.84 per week. More than half of the families affected lived in the private rented sector (mostly outer London boroughs). Notably, the research found that "households in temporary accommodation are three times more likely to have been hit by the benefit cap, seeing their housing benefit entitlement fall and incurring additional costs to local authorities" (Policy in Practice 2017:5). This finding is corroborated by the figures below. Of the 6,553 households that moved into TA:

    i. 45% (2,956) were in work

    ii. 49% (3,220) were lone parents

    iii. 5% (308) remained affected by the benefit cap

Although the causal relationship is indirect, it still suggests that, for those in category (iii) above, the cap was the main reason for their inability to meet their rental obligations which led to their homelessness. It further suggests that the affordability of housing in London is determined not only by its cost, but by a household's ability to pay as well. Citing the London Borough of Croydon as an example, the research further revealed that this LA had to meet some of the costs (about £1.1m) of the increasing demand for TA from homeless people who have had their housing support reduced through the cap.

Other research has shown that local context is important with regard to homelessness provision. In their study of the implementation of the Housing Act 1996 in Somerset and Gloucestershire, Cloke *et al* (2000) revealed that access to enough

local housing units was crucial if LAs are to implement the legislation effectively. And even when there was plentiful supply, the cost of accessing those units was usually prohibitive for benefit-dependent and low-income households. This finding, they believed, had practical implications for the way in which homelessness was dealt with, especially in situations where resources were scarce, meaning that the form in which support was delivered, the amount and to whom became important factors to consider.

Cloke *et al* (2000) also noted that, although hierarchical policymaking was expected within the welfare state, the controversies surrounding the 1996 Act meant that LAs were able to bypass some of the more restrictive elements of the Act and continued to provide housing assistance to most homeless households as before. Therefore, rather than the meltdown that was envisaged, Cloke and his colleagues argued that, in many LAs, 'the 1996 Act has resulted in 'change but no change' in the way in which homelessness is dealt with' (p.754). Nevertheless, the LAs' mode of implementation may have negative implications for them. This was because the LAs focused more on preventing homelessness and so accepted fewer households as statutorily homeless. As a result, Cloke *et al* (2000) concluded that there is a danger that this preventative focus could have given the impression that homelessness was no longer a chronic problem. Notwithstanding the difficulties of achieving policy objectives, or the law being circumvented, Fletcher and Wright (2017) believed that 'the legislative capacity of the law remains as a constant threat for the widespread and routine application of severe and long-lasting penalties for homeless applicants' (p.14).

In most cases, the availability of social housing (with support) could be a solution to homelessness. The housing-only approach or safety net, which is offered

to homeless people to solve their immediate housing need and is the most predominant offer to statutorily homeless people, has been criticised for being too specific and a relic of the past (Lancione, 2016). To solve this problem, the 'housing first' model has been advocated which recognises homeless people's needs and the structural constraints of homelessness causation and is the best option to solve homelessness in the medium- to long-term.

Recent homelessness research identified three risk factors of homelessness - personal capacity, access to informal support and access to formal support (Pleace, 2016). Reduced personal capacity such as less resilience, coping skills and access to financial resources can lead to homelessness which create other problems such as finding and keeping work. Other issues that affect resilience and coping ability are illness or disability, poor qualifications, drug addiction. These risk factors point to homelessness having individual characteristics.

Nonetheless, structural factors are the most pervasive and destructive. Burt (1991) has argued that the scarcity of affordable housing and welfare state retrenchments are amongst the most important structural factors surrounding homelessness. Others include ethnic, cultural and gender characteristics which may also determine the nature and experience of homelessness (Pleace, 2011).

Housing scarcity/affordability and welfare reform have provided a better explanation of homelessness causation since homelessness is a product of poverty and deep-rooted inequality (Pleace, 1998). However, scholars such as Anderson (1993), O'Flaherty (2004) and Fitzpatrick (2005) have argued that, rather than separating structure from agency, homelessness should be regarded as being caused by the interaction of structural and individual factors. Individual factors, according to

Pleace (2016), concern needs, characteristics, experiences and, importantly, actions, choice and behaviour.

So, combined with precarious work opportunities, welfare state retrenchment and unaffordable housing, homeless people's individual pathologies become almost insignificant in an environment where the explosion of wealth creation and accumulation has seen London become 'an exclusive metropolis of cosmopolitan elite who are influencing the nature of the city itself, thus creating enclaves of 'Alpha territory" (Burrows, Webber and Atkinson, 2016).

3.1.2. Local Governance of Housing towards Homeless People

The relationship that exists between the homeless applicant and the LA is separate from that between the LA and the private landlords who provide accommodation to homeless people on behalf of LAs. The homeless applicants do not lose their statutory relationship with the LA which guarantees the service provided by private landlords. Yet, even with this public service attachment, the relationships between the private sector landlord and the homeless applicants assume the features of "privatism" (de Leonardis, 2003 cited in de Leonardis, 2010:140), which indicates the precarity of the relationship. This type of neo-liberal form of governance raises questions about the value of homelessness provision as a public service which has been reduced to no more than adjuncts of the private sector. Being characterised by managerialist, business and consumerist rationalities, this kind of network governance makes notions of public service orientation difficult to rationalise (du Gay, 2000). Hence, Hodkinson's (2012) assertion that, whilst social housing and other public housing provision may not be perfect, it still provided protection against exploitation and enabled poor people to live in areas that they would otherwise be unable to do if they had to rely on the private sector.

The defining factor of homelessness provision for LAs is the procurement of suitable accommodation at a reasonable cost. As already indicated, LAs rely on private sector landlords to provide such accommodation, at short notice, to fulfil statutory housing obligations towards homeless applicants. This dependence on the private sector is very significant, and constraining, as the private landlords have the power to decide on the modes of engagement with LAs, that is, when to enter into or exit a contract arrangement, and on the cost of available accommodation.

Despite these and other constraints (e.g. lack of housing capacity; financial resources) that LAs have in meeting local people's needs, the government has sought, rather controversially and arguably belatedly, to curb the saturation of private landlords in the housing market. With the ratification of the Finance Act 2016, the government has moved to increase the stamp duty land tax on buy-to-let properties. Nevertheless, Marsh and Rhodes (1992) had argued that private enterprise have enough resilience and capacity to self-organise and evade state intrusion into their business plans. It may also mean that private landlords would simply pass on the extra costs to tenants or, in cases of TA provision, to LAs. Therefore, the effectiveness of increased stamp duty land tax as a way of cooling down the market or deterring private landlords from increasing their buy-to-let property portfolios, at the expense of aspiring home owners, remains to be seen.

3.2.   Conditionality in Welfare Policy

In the next two sections, I offer an analysis of one of the key themes of the welfare reform programme – *welfare conditionality* – in relation to the design, content and practice of policy.

The contractualist concept of conditionality in welfare is based on the idea that entitlement to welfare benefits should be based on recipients satisfying certain

mandatory conditions such as doing their utmost to find work and not be solely dependent on benefits (Slater, 2012; Watts *et al*, 2014). The main argument in favour of conditionality is that it deters or limits the something-for-nothing culture by insisting that every employable citizen contributes to society via paid work (Whitworth and Griggs, 2013; Watts *et al*, 2014) and, where wages are insufficient for daily living, the state will provide extra support. Related to the deterrent motive of conditionality is the argument that public attitudes have hardened against so-called welfare dependency and worklessness (Shildrick *et al*, 2012; Ralston and Gayle, 2017), especially as the receipt of welfare benefits has, in recent decades, been perceived as a lifestyle choice rather than a temporary hiatus when unemployed people review their work options (Pykett, 2014). This thinking was due largely, in part, to the notion that access to social security assistance was a citizenship right or entitlement.

Supporters of the welfare reforms have also argued that the benefit system in Britain has always been dependent on personal responsibility and reasonable behaviour which the welfare reform programme sought to reinforce. Following the Second World War, and in line with Beveridge's plan to tackle the Five Giants of Evil - *squalor, ignorance, want, idleness,* and *disease* - the welfare state that emerged was based on the principle of *less eligibility* which meant that unemployed recipients should not be better off on benefits than in work. Another principle was that it should be a contributory system to provide for productive citizens in times of need (Marshall, 1950; Dwyer and Wright, 2014).

More recently, Halpern, Bates, Mulgan and Aldridge (2004) advocated theories of behaviour change (e.g. rational man, individuality and conditionality) that could see a return to (indeed, hardening of) the principles of the Welfare State. Halpern and his colleagues argued that better economic outcomes would be achieved

with the active work participation of citizens and that such behaviour-based interventions could significantly reduce the cost of the traditional welfare state. This suggested that the cost of providing out-of-work income to unemployed people was far too high. Thus, they advocated for activation strategies in labour market policies which would see stringent conditionality requirements for claiming unemployment benefits. Dwyer and Wright (2014) referred to the ideas of Halpern and his colleagues as a new form of 'instrumental behaviourism', an advanced version of welfare conditionality, which was the basis of a reform agenda during the New Labour years (1997-2010). At the time, the DWP adopted 'the principle that aspects of state support, usually financial or practical, are dependent on citizens meeting certain conditions which are invariably behavioural' (DWP, 2008:1).

In recent times, successive governments have defended welfare conditionality and the use of sanctions on both contractualist and paternalist grounds (Watts *et al.*, 2014). The contractualist argument is centred around the Beveridgean notion which, as already indicated, suggests that the welfare state should only provide short-term support during times of crises or when job hunting: it should certainly not be a system for dependency. The paternalist argument is related to the contractualist argument in that paid work benefits citizens in the long run and would free them from poverty and welfare dependency (Watts *et al.*, 2014).

The fundamental notion behind the concept of 'welfare dependency' is

> ... the contention that ... poor, dependent people have something more than lack of money wrong with them. The flaws can be located in biology, psychology, upbringing, neighbourhood influence; they can be cast as cause or as effect of poverty, or even as both simultaneously (Fraser and Gordon, 1994:318).

Therefore, both positive and negative incentives are needed to tackle these flaws as and when they emerge. For example, increase in income disregards to ensure that

people who work realise more of the money they earn which means they would be more 'inclined to seek and remain in paid work' (Kingfisher, 1998:122). On the negative side, the adoption of sanctions would penalise recipients, financially, for failing to meet their work obligations.

These conditional rights and onerous obligations are linked to the social identity of the recipients. Van Berkel and de Graaf (2007) argued that conflating recipients' rights to benefits with their obligation to become work active has redefined the normative category of vulnerable persons. It has also redefined their abilities to engage with new welfare policy requirements and the way they are recognised as persons at risk. By emphasising that recipients have a responsibility to take work opportunities available to them, any failure to do so becomes an individual problem rather than structural or social issues. Where recipients fulfil their work obligations, even if their wages are insufficient to meet their household needs, they are recognised as the deserving poor, highlighting a new norm for citizenship – social citizenship. Social citizenship, van Berkel and de Graaf (2007:18) believe, has a 'tendency to grant social rights a provisory status: it has to be earned by showing satisfactory social motivation and behaviour.'

This suggests two things – a) that identity as a citizen, and a respect for that identity, is dependent on having paid work; and, b) identity as a worker is dependent on being responsible for one's personal development by investing in training opportunities which enables the individual to progress in their work or careers during the life course. These suggestions are played out in the new forms of governance, where policy implementers have to evaluate people's willingness to engage in the jobs market when making their decisions for welfare provision.

This form of governance has transformed the benefit system from a welfare society' to 'active society' (Walters, 1997). While this shift in the welfare state was intended to address individuals' unwillingness to work and thus their social citizenship, scholars of social justice (e.g. Standing, 2011; Slater, 2012) have criticised the recent transformations on fairness and 'truth' grounds. These observations were based on the founding principles of the Welfare State which central tenet, they argued, was 'universality', that is, unconditionally. However, Straw (2007) has also argued that this social democratic value, while it was necessary in the post-war period, has become redundant in the wake of population increases and globalisation. Moreover, then as opposed to now, there was a clear consensus for social pooling of risks and the main concern was social provision after the austerity of the war years, not judging neediness or the future motivation of the benefit recipients.

The hostile mix of coercive and enabling conditions of current welfare reform policy raises pertinent questions about the effectiveness and ethics of the contemporary turn towards the phenomenon that Newman (2006) has termed 'cultural governance' (p.13). In his study, which relates to this notion of cultural governance and was based on public opinion about deservingness, van Oorschot (2000) found no evidence that a spike in sanctions had any corresponding effect on recipients' behaviour. In fact, he noted that sanctions only served to impede recipients from doing meaningful job search and may even entrench any 'negative' attitudes to work that recipients may have already internalised, especially where the jobs are low paid and insecure, meaning that the wages they could attract would be insufficient to meet their living expenses (Dean, 2012). Moreover, Daguerre and Etherington (2014), in analysing the evolution of welfare reform in the US and the

UK, indicated that worklessness was portrayed as 'a behavioural problem rather than a demand-side issue due to the lack of job offers' (p.30).

Building on the 'creeping conditionality' arguments (Dwyer, 2004) of the welfare reforms in the 1990s and 2000s, it can be seen that universal conditionality has been renewed and normalised. The scope and significance of the current welfare reforms are far-reaching as welfare responsibilities of the state are transferred onto recipients who are held responsible for being unemployed. Welfare benefit retrenchment and increased conditionality are thus linked to the 'routines of deterrence, denial and discipline' that Carlen (1994: 19) had identified more than two decades ago. Thus, focusing on individual agency, policymakers have been allowed 'to deflect attention away from the long-term, systemic failings of much government policy and associated practice' (Dwyer and Wright, 2014). Indeed, Wacquant (2009), a prominent social theorist, believe that welfare reform programmes are mainly illiberal policies that 'promote business interests whilst at the same time instituting policies that penalise marginal groups' (p. 210).

The status and motivations of the recipient were also issues that should be considered during implementation. The uncertain or contradictory position of the recipient means that, on the one hand, he is targeted for work activation interventions but, on the other hand, he can choose whether to become active or not. In other words, the recipient becomes 'the director of these interventions as the support would need to be customised, thus implying steering by the recipient' (van Berkel and de Graaf, 2007:17). Consideration of this ambivalence in rights and obligations of the target groups is important for the implementation of the policy. Still, this dichotomy between rights and obligations seem to be resolved by the process of 'contractualisation' (Watts *et al*, 2014), whereby recipients are treated as

a 'party', even if, as expected, it would be an uneven relationship (van Berkel and de Graaf, 2007).

The work-first approach espoused by the policy is problematic as it blames individuals for circumstances that may be beyond their control. For example, personal impairments and health problems which are deemed to not be severe enough to make them exempt from the cap or a disregard for responsibilities to others e.g. the care needs of family members (Dwyer and Wright, 2014). These previously-exempt groups have now been reclassified as potentially employable workers, despite their (in)capability or caring constraints (Dwyer and Wright, 2014; Pennycook and Whittaker, 2012). This means that (lone) parents with children over the age of two years face the full conditionality whilst those recipients who are recovering from ill health should engage in work preparation. The long-term sick with serious health conditions and disabled face no conditionality (although they may still be subject to (re)assessments of health conditions and may also move categories). So, for Johnsen, Watts and Fitzpatrick (2016), the groups likely to be adversely affected by conditionality are the sick or those with uncertain family commitments whom they referred to as 'casualties of conditionality'. Their inabilities (rather than unwillingness) to meet the requirements of their social citizenship obligations may disentitle them as they 'struggle to live up to these new norms of productive and active citizenship' (Reeves and Loopstra, 2017:11).

As stated earlier, although conditionality for unemployment assistance has always existed (Clasen and Clegg, 2006), the expansion of 'conduct conditionality' in the form of 'coercive behaviouralism' (Dwyer and Wright, 2014) has been worrisome for analysts such as Wacquant (2009), who have contended that behavioural conditionality appears to be linked to moves to criminalise social policy. Citing

Rodger (2008), Fletcher and Wright (2017) noted that behavioural conditionality also entails 'redefining the aims and objectives of the welfare state, and in the process abandoning concerns for meeting human needs at the expense of maintaining a disciplined and orderly society' (p.3). For Wacqaunt (2009), the new welfare regime could, thus, be regarded as

> a shift 'from carrots to sticks', from voluntary programmes supplying resources to mandatory programmes enforcing compliance with behavioural rules by means of reductions in benefits and a termination of recipiency irrespective of need. (p. 60).

Remarkably, the Work and Pensions Select Committee, after having heard evidence from frontline agencies who highlighted how sanctions disproportionately affect vulnerable groups, concluded in its report that protracted conditionality may fail some vulnerable individuals (Work and Pensions Committee, 2015). Similarly, Reeves and Loopstra (2017) suggest that, although one of the aims of the reforms is to change recipient behaviour, the mechanisms and support from government to effect behaviour change are lacking. They therefore concluded that because 'the welfare changes are intended, in part, to address the problem of welfare spending by activating citizens' (p.3), the new regime was essentially curtailing recipients' entitlements to meet budget deficits and shifting social citizenship expectations.

3.2.1.   Conditionality and Homelessness Provision

As already mentioned elsewhere in this chapter, current welfare policy and practice constitute a bold and unapologetic conditional regime for access to support, meaning eligibility to certain basic welfare entitlements have become dependent on citizens meeting compulsory duties or patterns of behaviour (Dwyer, 2008).

It must be remembered, however, that within the conditionality frame, housing and homelessness provision rests on five basic criteria only (as demonstrated

on in the last chapter) which were developed three decades after the universalistic welfare state was founded. Despite these set criteria, for Dobson (2017), housing provision has become a 'gift' to which local rules are attached and access is gained via local power in the form of 'gatekeeping', discretionary practices and LAs' interpretation of the law and regulations to organise access to homelessness support. Fulfilling all the eligibility criteria for this 'gift' should open the door to unconditional housing support for some homeless applicants.

However, many homeless applicants with dependent children fail, arguably the key criterion, the 'intentionality' test. This criterion places responsibility for compliance with tenancy/housing conditions on the individual and where the loss of last settled accommodation was due to a deliberate act or omission on the part of the applicant, the LA will not be responsible for rehousing them. For example, failure (not inability) to pay rent and failure to submit a housing benefit application fall under this test. So, one can see that the 'intentionality' test is, partly, a rationing tool to delimit the 'deserving' from the 'undeserving' poor for homelessness provision (Fitzpatrick and Stephens, 1999).

Although the Code of Conduct clearly indicates what intentionality entails (see Chapter 5), frontline housing professionals still have discretion when implementing the law and the accompanying guidance. Where negative discretion is exercised, and individuals are found to be intentionally homeless, their prospects of a long-term housing solution from the LA is severely curtailed. Dwyer, Bowpitt, Sundin and Weinstein (2014) believe that the issue of intentionality within homelessness criteria is related to wider debates about 'just deserts and whether or not it is reasonable to link access to basic welfare provisions, such as housing, to the display of responsible behaviour on the part of benefit recipients' (p.13).

3.3. Street-Level Bureaucracy - Bottom-up Approach to Policy Implementation

Within the bottom up perspective, Elmore (1980) posited that understanding policy implementation should be derived from 'backward mapping', that is, from the citizen, to frontline worker to organisation and policymaker. Hill (1997) applauded Elmore's perspective on policy implementation for its flexibility and ability to analyse policies as they are rather than policies as they should be. Other scholars from the bottom-up camp include Lipsky (1980) who emphasised that implementation consists of the routine problem-solving strategies of frontline workers whom he termed "street-level bureaucrats" (SLBs). Lipsky also argued that SLBs have considerable autonomy from their superiors, given that they have extensive discretion at their disposal.

Hill and Hupe (2009) conceded that Lipsky's scholarship on street-level bureaucracy has significantly broadened the study of public policy and administration. However, in their earlier writings, Hill and Hupe (2002) believed that Lipsky's (1980) work has been widely misinterpreted by policy administration analysts in that, as well as highlighting the difficulties of controlling SLBs' behaviour, SLBs also create policy whilst performing their duties. Such depiction of the bottom-up model suggests that policy implementation bestows on implementers an inordinate amount of discretion and power. But as I will show below, there are mechanisms (e.g. performance management tactics) that are being deployed to direct SLB behaviour towards prescribed goals. Still, other commentators (e.g. deLeon and deLeon, 2002) have also criticised bottom-up theorists for overrating the autonomy that SLBs have. The bottom-up model, they believed, is limited in its scope as certain occasions (e.g.

national security, public health policies or many legal judgements) call for a top-down or command and control approach which SLBs must abide by.

Recognising that it is individuals (rather than organisations as entities) that implement change, bottom-up theorists argue that SLBs are the main actors in policy delivery. For this reason, bottom-up theorists regard policy implementation as a process of negotiation within networks of implementers (Pülzl and Treib, 2007) and not just as an administrative process as top-down theorists have portrayed.

Nevertheless, Lipsky's work is important for two reasons. Firstly, his approach paved the way for methodological strategies that focus on street-level actors. Secondly, it exposed the flaws of the top-down approaches which fail to recognise that a hierarchical approach, suffused with self-serving political objectives, are insufficient to guarantee successful implementation.

In this thesis, consideration will be given to three dependent variables: a) agents whose preferences and leadership abilities may further shape policy outcomes (Lipsky 1980); b) the conditions within the implementation environment which may have an impact on outcomes, not least the behaviour of targets groups of public policy (Mazmanian and Sabatier, 1989); and, c) resources (and local economic conditions) (this will be discussed further later on in this chapter).

3.3.1. Interpretation of Policy by SLBs

The focus on agents is a critical one. Hill (2003) argued that policy implementers face several challenges, one of which is figuring out the meaning of a policy as the content of a policy rarely 'conveys enough context or background for discerning legislators' intent' (p.268). Yanow (1996), an influential theorist of the interpretive approach to policy implementation (a bottom-up perspective), sums this up well when she asserted that:

> *What is being communicated is not solely "legislative intent" but also societal meanings (values, beliefs, feelings) concerning the subject of the policy... which are carried in various ways and in various parts of the "culture" of the policy issue. They are carried in the policy's language, but also in the language of the debate about its legislation and in discussions surrounding its implementation. They are carried in the objects that the implementing agency creates and uses in its operations... And they are carried in the agency's acts, in its daily, weekly, monthly, annual operations (p. 127).*

This ambiguity makes local interpretation of the policy, especially for everyday practice, inevitable. Thus, notwithstanding the excellent advocacy by bottom-up theorists such as Lipsky (1980) and Elmore (1980), their work provides only a partial picture of the issues involved in policy implementation at the street level. For example, Lipsky did not consider the complexity of social support systems and how interpretation and understanding of policy can affect implementation at the local level. This requires some form of sensemaking for policy implementation. Such sensemaking takes place at the individual level but also across different stakeholder groups too.

From a cognitive perspective, individuals go through a process of 'sense-making' to understand and interpret a policy which they are charged with implementing (Spillane, Reiser and Reimer, 2002). The concept of bounded rationality or 'situational awareness' (Lane and Hamann, 2003) also shows how individuals traverse the sensemaking process to take action and implement (or not implement) a given policy directive within a complex environment such as the welfare state. Bottom-up theorists, like Lipsky, did not consider the iterative processes involved in this sense-making stage of policy implementation to acknowledge that the contents of policy messages are shared and interpreted within and across multiple levels of the welfare system which means they can have an impact on decision-making at these levels (Pülzl and Treib, 2007).

Yanow (2006) asserted that, rather than taking the factual essence of problems as its main point of reference, the interpretative approach demonstrates that there are numerous, even ambiguous and conflicting, meanings and interpretations that coexist in parallel. Thus, in contrast to traditional policy analysis that focuses on theorising about the gap between policy intention and outcome, interpretative analysis instead tries to decipher "how policy means" (Yanow, 1996). Moreover, the approach takes as its starting point the view that prior debates before policy is enacted have an impact on policy practice as they influence implementers' understanding of the policy problem. Besides, the contents of policies may well only publicise objectives that are publicly expressible, meaning that implementing agencies have to deal with the hidden or "verboten goals" (Yanow,1996:205) that are rarely communicated.

The interpretative approach, therefore, takes as its starting point the interpretation of meaning passed on by policymakers. The multiple meanings, which are embedded in the 'policy culture' (Yanow, 1987), are obtained from symbols, metaphors, and speeches. As such, the context within which the policy is implemented becomes an important part of the analysis. This context-specific meaning of policy shows that these are important features of the implementation process. Yanow's interpretive analytical approach thus supports and enhances this street level research.

3.3.2. Role of Street-Level Organisations (SLOs)

There are two elements to the theoretical framing of the policy implementation process. Firstly, that policy interpretation is diffuse across the implementation landscape, not least through moral parameters such as organisational norms and values which make the role of the local implementers critical. Secondly,

Lipsky's (1980) scholarship on discretion highlights the individual as a critical player in the implementation process. But for individuals to exercise such discretion, they must operate within an organisational context. This makes the organisational dimension very important.

Wilson (1989) developed a typology of government agencies containing four distinct features - coping, production, procedural, and craft – depending on the activities the organisations undertake and the results of those activities. Within the organisational structures and categories of tasks, coping agencies deliver public services. As such, implementing agencies performing welfare reform tasks fall under the remit of coping agencies which is characterised by the centrality of direct and daily interactions with individual citizens.

Whilst some of these SLOs may fall under the professional bracket (e.g. social worker), there are some (e.g. housing) that are regarded as semi-professionals, meaning that within their professionalism, workers also encounter bureaucracy (Hupe and Buffat, 2014). In such organisational structures, workers have varying roles in the hierarchy e.g. senior, mid- and street-level.

The normative assumptions of policy implementation are that SLOs should "follow the law" (the Weberian model) or operate as "agents of the state" (the principal-agent or traditional model) (Brodkin, 2016:445). The latter model of policy implementation is said to increase the gaps between policy aims and objectives. However, Brodkin (2011) posited a framework for understanding street-level logic of choice in regard to policy implementation which she referred to as the 'choice calculus' (p. i272). The framework is useful for investigating the organisational climate wherein discretionary choices are made, taking into account the relationship between resources, demands, and incentives that allow for particular choices as opposed to

others and how these situations can produce patterns of practice that determine clients' experience of policy (Brodkin, 2016).

In a multi-national research that placed street-level organisations at the heart of welfare-state politics, policy, and management, Brodkin and Marston (2013) illustrated how agencies providing labour market services met their performance objectives. They found that they either 'built individual capacity to help clients find and keep jobs or shoehorned poorly qualified individuals into inadequate and insecure jobs or even found ways to selectively keep the most "difficult to serve" from the client base that "counted" toward their targets (Brodkin, 2016:447). The formal implementation practices influenced the performance metrics but, crucially, the informal practices affected the target population more, especially in cases where they are left without income or work. Brodkin (2016) thus cautions street level researchers to be cognisant of 'simplistic caricatures of human services agencies as either heroic providers helping those with social needs or villainous oppressors of those in need' (p.448), given the structural environments within which these practices occur. This suggests that some implementation practices are carried out because there is no/little option if policy objectives are to be met.

Brodkin (2016) also cited scenarios where implementation gaps occur. For example, staff shortages leading to less time to listen to clients; mounting paperwork making the system creak under the pressure which then create a situation of paper-pushing; where implementing agencies have less resources to offer a good service to citizens, they resort to rationing, creaming, and deflecting clients away from their services. Brodkin's concern with these types of adaptations to chronic mismatch is that they tend to redefine services at the street level even though they are hidden

and happen informally. The clandestine manner in which this happens therefore makes it much difficult for clients to seek remedy/redress.

The perennial mismatch between organisational resources and the demands of public policy for implementation agencies make for such corrosive practices and may be at cross-purposes with the organisations' mission. The suggestion, therefore, is that implementing agencies cannot be criticised for adopting mechanisms that will help towards meeting their obligations as they are usually cash-strapped and under legal and political pressure to perform.

Hupe and Hill (2007) refer to this kind of public policy implementation as an 'action imperative.' An action imperative leads to a public service gap, which is the 'difference between what is being asked of public organisations and the resources offered to public officials doing their frontline work when they come into contact with citizens' (Hupe and Buffat (2014: 556). The public service gap is considered to be typical of all government bureaucracies.

Morris and Scott (2003) too observed that implementing agencies are often faced with the task of 'reconciling the irreconcilable'. Therefore, they have no choice but to make compromises, for example, adjusting the policy to meet the local context. Without these modifications, problems may arise from the implementation of top-down policy mandates in unique organisational settings such as LAs. Meanwhile, Breit, Andreassen and Salomon (2016) suggest that, from an organisational perspective, policy implementation at the local level is dependent on implementing organisations supporting SLBs to 'enact the change processes, rather than undermine them' (p.712).

Whilst shortages of resources may be a perennial issue, the current welfare reform context increases demand for housing assistance. The governance of housing and homelessness thus needs to be set within these social and structural contexts. The progressive 'hollowing out' of the state, as previously mentioned, has played a major part in the scarcity of affordable housing and continues to impact on LAs' ability to accommodate homeless people adequately (Shelter, 2015). Although each social housing sold for private use, under Right to Buy, was to be replaced, the reality is that this rarely happened, just as is LA housebuilding generally. To illustrate the dire state of LA housebuilding in recent years, Table 3 shows the total number of housing stock additions in England in the six years to 2017 (unfortunately separate figures are not available for London). Generally, the number of new LA-built houses in England were the lowest in all sectors. Yet, of significance still was the house completions in the LA sector in 2013/14 when only 910 houses were completed in the whole of England compared to the private sector's 90,000 odd, a ratio of nearly 1:100. Notably, most of these new additions to the national housing stock would not be accessible to benefit-dependent people. This is because, even housing associations that help LAs fulfil their statutory duties, are increasingly becoming more market-oriented as most of the capital used to develop the new stock is being provided by the markets, not central government. Thus, in the view of Jones and Pleace (2010), social housing has been the loser in government spending priorities.

Table 3 – Total Number of Housing Stock Additions in England (2011 – 2017)

Completions	Private sector	RSLs	LAs	Total social housing	Total completions
2011/12	89,120	27,460	1,960	29,420	118,540

2012/13	84,550	22,060	1,360	23,420	107,970
2013/14	89,630	21,790	910	22,700	112,330
2014/15	96,270	27,020	1,360	28,380	124,650
2015/16	111,540	26,400	1,890	28,290	139,830
2016/17	121,030	25,090	1,840	26,930	147,960

Source: https://www.gov.uk/government/collections/house-building-statistics

These figures provide clear evidence that successive governments have subscribed to the market ethos of housing provision and, as previously stated, this has allowed private investors to dictate the market at the expense of the LA sector where statutory duties lie. Moreover, Hupe and Buffat (2014) maintain that resource tensions become heightened after the introduction of changes in policy e.g. welfare reforms. The austerity that usually accompanies these policy changes mean that hard decisions need to be made by implementing agencies as they face situations of 'doing more with less' or 'doing the same with less', giving rise to a public service gap.

3.3.3. The Practices of Street-Level Bureaucrats (SLBs)

As already stated, welfare reform policies represent "a profound change in the balance between rights and obligations in the provision of social assistance" (Lødemel and Trickey, 2000:10) and this makes implementation an important aspect of policy goal attainment. However, in implementing these policies, several questions come to mind. For example, who enforces or monitors these rights and obligations on behalf of the state?; who determines how these different rights and obligations affect individual claimants' benefit receipts? These questions point to the significance of the SLB in enacting public policy.

Hupe and Buffat (2014) regard SLBs as specialised workers (professional or semi-professional) who work in direct contact with individual citizens (e.g. homeless applicants, pupils, benefit claimants, patients) to enact public policy on behalf of

policymakers. The key feature of SLBs is that they are knowledgeable about their work and so are deemed to have expert judgement. Their professional knowledge and expertise also give them power and authority within the domain of their work. This work, according to Wright (2003), involves detail and technicality and, coupled with their position within the hierarchy, they are allowed autonomous judgements in their decision-making. In return for this autonomy, they have to abide by ethical codes of practice and their actions are subject to arbitration by the judiciary and the complaint process. Critiques of this view, however, argue that the autonomy of SLBs has been limited by performance management, increased managerial control and surveillance (Evans and Harris, 2004; Evans, 2010).

However, Brodkin (2016) argues that performance measures, while now embedded in the new performance management regimes of organisations, are not as powerful as they are made out to be because they are not developed enough to assess complex dimensions such as individual perceptions; they can even be misused for self-serving purposes. This street-level perspective demonstrates how SLBs may informally adapt to the demands of performance measurement. For example, to meet performance indicators, SLBs may avoid more difficult cases and 'cream off' the easier ones to meet targets (Soss, Fording, and Schram, 2011b).

Eligibility criteria, as codified in law, is also a form of control on SLB discretion. In his analysis of decision-making in three LAs, Loveland (1991) summed up well the dilemmas that SLBs face:

> Legalism is an intruder into the administrative arena. It does not prescribe administrative behaviour but challenges it. It does not facilitate the decision-making process, rather it gets in the way. It is not respected but ignored. And if it cannot be ignored it is grudgingly accepted as an unrealistic impediment to rational decision making (p.22).

Thus, the law has increasingly come into conflict with SLB discretion and other organisational goals such as strategic control of resources. As a result of these constraints and their sensitivity to the 'human dimensions of situations' (Lipsky, 2010:15), SLBs' professional judgements become even more important when carrying out their work, which discretion cannot be replaced with prescribed procedures or instructions (Cohen, 2015).

In Lipsky's (1980/2010) view, SLBs are overcome by the competing demands of their jobs. As such, they develop coping mechanisms to deal with their workloads and dwindling resources. Street-level bureaucrats' coping mechanisms include discretion and its variants (e.g. rule-breaking and rationing) to manage their work (these themes will be examined below). Blackmore (2001) refer to these practices as "defences against discretion", which paradoxically mean that officer discretion is exercised for worker benefit instead of the clients' (p.147). This is especially so as local policy implementation is effected by relatively low-level public service workers, which makes the exercise of discretion inevitable, given that 'regulations are encyclopaedic and constantly being changed' (Lipsky, 1980:14). In such circumstances, SLBs may only be able to adhere to the most basic rules of a public policy.

Moreover, their position in the hierarchy means that SLBs implement the directives of their superiors but sometimes defy these hierarchical directions in order to practise policies which, in their view, are appropriate and meaningful locally (Maynard-Moody and Musheno 2003). In other words, where a public policy is perceived as meaningless, SLBs may be reluctant to effect it on the ground (Tummers and Bekkers 2014).

Policy Meaninglessness/Alienation

Policy meaningfulness, according to Tummers and Bekkers (2014), is an important factor in SLBs' motivations in policy implementation. This is because SLBs are active agents, who negotiate policy implementation and promote professional norms and values (Evans 2011). Individual motivation and commitment (or will) may be manifest in an individual's assessment of the value of a policy or the appropriateness of a strategy (McLaughlin, 1987). The emphasis on individual motivation suggests that it is not only the features of a policy that determine outcomes, especially at lower levels of the implementation framework. Street-level bureaucrats' beliefs and attitudes towards policy contents also influence their actions and decisions at the street level (Maynard-Moody and Musheno, 2003; May and Winter 2007). In circumstances where SLBs do not agree with the policy content, aims or objectives, Tummers (2013) has referred to such situations as 'policy alienation'. Tummers defines policy alienation as 'a general cognitive state of psychological disconnection from the policy programme to be implemented by a public professional who regularly interacts directly with citizens' (pp. 44-45).

Within the policy implementation context, policy alienation is manifested as worker resistance, 'a kind of political act of opposition to the dominant ideology that moulds the policy agenda and dictates the conditions of delivery' (Wright, 2003:24). Policy alienation is multi-faceted and constitutes, amongst others, dimensions on operational powerlessness and societal meaninglessness (Seeman, 1959 cited in Tummers, 2009). In this study, operational powerlessness refers to SLBs' lack of control over hierarchical policy decisions such as the benefit cap policy. SLBs' powerlessness may also be manifested in their lack of influence over the sort, quantity and quality of sanctions and rewards they issue (Lipsky, 1980) and the non-negotiable

character of the policy implementation. Societal meaninglessness, on the other hand, refers to SLBs' inability to comprehend the relationship of their contribution to the larger purpose of achieving behaviour change that will simultaneously reduce the welfare bill and conform with homelessness law. Besides, SLBs may feel that their role in implementing the policy is meaningless as making applicants poorer (or indeed, moving people away from their local communities) does not benefit society in any way (van Thiel and Leeuw, 2002).

McLaughlin (1987) too identified local capacity and will as the dependent variables for the successful implementation of policy. For McLaughlin, whilst the problem of local capacity may be resolvable through, for example, training or financial resources, individual will to act or, as McLaughlin puts it, 'the attitudes, motivation, and beliefs that underlie an implementer's response to a policy's goals or strategies' (p.172) is much harder to fix.

Thus, by resisting the policy prescription and contents, SLBs bend the rules to complete their work tasks. For example, Hvinden (1994), in his study of welfare services in Scotland and Norway, showed some of the positive impacts of specific 'rule-bending' on both service users and staff. The study found that staff were more likely to bend the rules for the old and frail, who were regarded as more deserving, than they were for the young and able-bodied users. Hvinden believed that this form of discretion allowed staff to be flexible and respond to service users' needs as their professional duty required. Hvinden concluded that rule-bending has the effect of restoring staff 'occupational self-respect and sense of pride; and reduced their feeling of being just cogs in a large bureaucratic machinery' (p.123).

From an implementation perspective, Bardach (1997) suggests that workers' attitude to a policy influences their actions at the street level. Bardach maintains that

a "well-functioning paternalist programme must be grounded in a coherent moral theory" for "an incoherent or misguided moral theory will not only fail … but will also provoke cynicism and quiet sabotage" (Bardach, 1997: 249). The consequences of a negative attitude towards policy will not only result in inefficiencies but may also result in SLB unwillingness to follow policy prescription. In short, how SLBs accommodate the policy at the street level will depend on their belief about the purpose of the intervention, which 'in turn, depends on how much they believe in the 'moral rightness' of what they are asking citizens to do' (Bardach, 1997: 255).

A solution to the problem of motivation, as suggested by McLaughlin (1987), is to apply pressure on SLBs. However, pressure alone is insufficient to address this problem and bring about changes in attitudes, beliefs, and the routine practices of SLBs that are taken for granted in terms of policy implementation. incentive and sanctions may improve motivation, but this will depend on the types of incentives and sanctions that senior and mid-level managers provide to SLBs. However, if managers are also unwilling to implement a policy, or if the sanctions available to punish non-compliance are insufficient, then fulfilling policy objectives will be harder still. The issue then becomes how frequent these patterns are and to what extent these work attitudes impact service delivery, particularly where vulnerable people, such as families with dependent children, are concerned. For as Lipsky (1980) contended: 'in street-level bureaucracies, the objects of critical decisions - people - actually change as a result of the decisions' (p.9).

Discretion

Discretion is assumed in legislation which, according to Harlow and Rawlings (1984), is 'embedded discretion' (p.298), meaning that implementing agencies and their officials have leeway to determine 'reasonableness' and 'exceptionality'. The

SLBs who then enact the policies, therefore, inhabit the dual roles of making independent, subjective judgements and interpreting rules (Hill, 1997).

Durose (2007) has also argued that SLBs are empowered and are changing the dynamics of hierarchical control which, in turn, have transformed their positions from that of pressured, coping bureaucrats to increasingly active, innovative entrepreneurs (Durose, 2011). This perspective highlights how SLBs use discretion 'to cope with institutional pressures by focusing on work activities for which they are immediately accountable' (Lindhorst and Padgett, 2005:14). What is more, SLBs also act as "citizen agents" (Maynard-Moody and Musheno, 2000:343) when they engage in personal and emotional relationships with citizens; they exercise discretion when they believe citizens deserve a service. This belief emanates from the information that SLBs assemble from direct contact with citizens and through socialisation with work peers to form a rational worldview about citizens (Lindhorst and Padgett, 2005). Discretion, in this sense, is manifest in the ways that SLBs choose 'to ration services they can offer and in the rigour with which they enforce eligibility rules' (Meyers, Glaser, and MacDonald, 1998:19).

Kingfisher (1998) too posited that SLBs interpret and construct policy as a result of their perceptions of 'deservingness', 'worthiness' or 'fairness'. Street-level bureaucrats would go out of their way to provide service to citizens who fit into the category of 'deserving poor', as Hvinden (1994) found in his research. This means that SLBs perform the role of gatekeeper between order and disorder which is expressed, maintained and reproduced in the discourse of welfare to distinguish the 'deserving' from the 'undeserving' poor (Smith, 1990). This individualist view of street-level work gives SLBs latitude to draw on specific practices or support programme when dealing with individual cases.

Rationing

As already indicated, rationing is implicated in SLB discretion due to limited resources. Rationing is a form of classification that seeks to control access to benefits and services within welfare agencies (Wright, 2003; Cumming and Caragata, 2011). Judge (1975) classified rationing activity into three distinctive types: 'financial rationing' of resource allocation to implement welfare policy; 'service rationing' in the distribution of allocated resources to individual citizens in the form of benefits and services; and, 'consumer rationing' which is "the non-expression of legitimate demands for service provision" by a citizen (p.147). Of these categories, the most contentious is the consumer rationing concept as it entails citizens not expressing a legitimate demand for a service.

Wright (2003) believes that rationing, like discretion, has formal and informal variants. Formal rationing imposes limits on the allocation of welfare benefits and services through 'the administrative arrangements which dictate who is eligible for what, in which circumstances and for how long' (p.30). Against this administrative backdrop, allocation and access is dependent on the peculiarities of the welfare system, the political priorities of the policymakers and the funding regime that accompanies the policy directive. All of these, Levin (1997) contended, are influenced by the moral and ideological beliefs of policymakers.

As for rationing through eligibility rules, the 1996 Act certainly qualifies as a formal rationing method. Along with its Code of Guidance, the legislation grants LAs discretion in performing their statutory responsibilities towards homeless applicants. Through eligibility rules, welfare is explicitly rationed to exclude all but the most vulnerable households in need of homelessness assistance. Even though, in practice, eligibility rules apply uniformly across England, Foster (1983) had argued that 'their

application can vary from one local office to another, thus making welfare provision a matter for locally-defined eligibility rules' (p.12). While eligibility rules may be one way of ensuring that people receive similar or identical treatment from the services to which they apply for help, there is no guarantee that everyone in need or eligible for a service will receive an equitable provision. This is because, apart from eligibility rules, perceptions of 'deservingness' and 'genuineness' have also become part of the assessment process for homelessness assistance.

This pervasive form of rationing takes place at the point of service delivery during policy implementation. This type of informal rationing is being practiced by SLBs at the street level, even though it is not sanctioned officially (Lipsky, 1980). However, that is not to say that the organisation is unaware of such practices and other distributional biases that may result. In fact, Hill (1997) believe that the SLOs endorse informal rationing by creating the circumstances that make it necessary.

It is this autonomy in decision-making that SLBs are endowed with that led Lipsky (1980) to argue that they influence policy, given their 'considerable discretion in determining the nature, amount, and quality of benefits and sanctions provided by their agencies' (p.13). Against this backdrop, SLBs may be prone to manipulate the resources available to them for various reasons and these can lead to unintended effects which Lipsky identified as real or felt costs to the citizen. These costs include monetary, psychological/emotional, delay/queuing and information deficit. Thus, Wright (2003) contend that SLBs are in a prime position to mitigate (or exaggerate) the impact of the costs of seeking social assistance. Prottas (1979) too had suggested that SLBs have the power to change costs for different citizens 'by varying stance, attitude, and tone' (p.10). Such disparate decision-making can result in different outcomes for citizens, leading to the assertion by Thornton (1989) that, even though

the eligibility rules are universal, citizens' experiences of their housing rights will depend upon 'accidents of geography' (p. 84). This is not to say that complete standardisation of LA practice is in any way possible, even desirable.

For Lidstone (1994), LA responses to and interpretation of homelessness law could converge a lot more. Until then, local interpretations of the five criteria of homelessness provision will 'ensure that rationing by discretion remains a dominant force in the local responses to homelessness that results in homeless people receiving unequal treatment' (p.469).

Stigma

As already stated, the neediest and 'deserving' homeless households have a right to statutory housing provision in England. However, 'these rights also crystallise and render more visible the 'label' of homelessness' (Watts, 2013:60). Stuber and Schlesinger (2006) therefore suggest that the ways that such policies are designed and implemented towards the target groups can make a difference to individuals' experiences of stigma.

Baumberg, Bell and Gaffney (2012) defined stigma as 'the idea that a characteristic (e.g. claiming benefits or applying for homeless assistance) is seen as embarrassing or shameful and leads to lower social status.' For Link and Phelan (2001), stigma is the combination of several inter-related dynamics: labelling, stereotyping, status loss, separation, discrimination and a 'power situation' (p.367). Drawing on longitudinal qualitative research on single people with experiences of homelessness in a Scottish city, McNaughton (2008) highlighted the significance of stigma for those who see themselves as 'failed individuals' (p.142) for seeking help, suggesting that they have become alienated from the norms of a society that values self-reliance and the reciprocity inherent in social relations.

For Baumberg *et al* (2012), the sources of stigma are either instrumental or normative and include personal, social and institutional factors. Institutional stigma is manifested in the framing, structure and delivery of benefits, often with the normative goal of rewarding socially-acceptable behaviour but also, instrumentally, to deter systems abuse, stem demand and minimise costs (Baumberg, 2016; Li and Walker, 2017). Personal stigma, on the other hand, look to the inner feelings of shame and indignity which have a bearing on the individual's willingness to claim benefits, as this would erode their agency and self-esteem (Lister, 2004). Social stigma is related to personal stigma in that people feel judged for claiming benefits. This is because welfare benefit is seen as a 'gift' which the recipient is unable to return because they are poor, thus breaking deeply embedded norms of reciprocity (Spicker 1984; Stuber and Schlesinger 2006).

Still, Baumberg *et al* (2012) argued that benefits stigma is less about the shame individuals attach to claiming; rather it is mainly about what individuals think others might think, and the way they would be treated if they put in a claim. Making this observation from a large-scale study conducted in 2012 on the stigma attached to claiming benefits in Britain, Baumberg *et al* found that this decision-making dilemma exists even for those who are entitled to benefits because they worry about whether people see them as truly needy or morally acceptable, and whether the claim seems as a result of their (in)actions or it was a situation that was out of their control. In other words, whether they are 'deserving' of help or not.

As previously discussed, the stigma that consumer rationing creates in the minds of claimants is a powerful rationing tool as claimants could be deterred, whether voluntarily or otherwise, from applying for public services so as to protect their dignity (Lidstone, 1994). This reaction may be as a result of negative stereotypes

such as benefit claimants being labelled as 'scroungers' and 'cheats.' This type of rhetoric has flourished through government statements and the popular media, leading to 'moral panic' about welfare dependency.

Yet, scholars like Foster (1983) believe that deterrence is a deliberate strategy which is embedded in all welfare services and is geared towards weeding out the 'deserving' from the 'undeserving' poor. Miller (1990) draws parallels between the principles of the workhouse and the deterrent effect and applied it to the stigmatisation of homeless people which was manifested in deliberate attempts to discourage people from making homeless applications. Citing the use of bed and breakfast hotels, Miller argued that the use of these facilities prevents people from applying as homeless because what is on offer is not self-contained accommodation. Parker (1975) puts it succinctly when he suggested that 'deterrence' benefits LAs as better standards would encourage some homeless families to approach the LA first instead of seeking ways to secure alternate provision elsewhere by themselves.

The condition of housing stock and the terms of the offer – usually 'one and only offer' – may also deter homeless people from seeking assistance. Lidstone (1994) contended that SLBs tactics of giving homeless applicants a non-negotiable offer of accommodation that is usually in poor condition (but still deemed a 'reasonable offer') increases the likelihood of the applicants refusing the offer or abandoning the accommodation sometime after moving in. Spontaneous remissions (Parker, 1975) or abandonments from TA, either because of its condition or delays in moving homeless applicants into permanent accommodation have continued over the years. Niner's (1989) study of homelessness provision in nine LAs corroborates this position in the patterns of homeless applicants vacating bed and breakfast

accommodation of their own accord. As a result, LAs are absolved from fulfilling their statutory duty towards such homeless applicants.

3.4.   Conclusion

Given that homelessness is not a discipline in itself, borrowing theories and concepts from other related disciplines was important to frame this study. The conceptual ideas from political science, policy administration, and behavioural economics have combined to provide an insight into the existing literature on policy implementation. The literature has demonstrated that policy implementation is not only done at the frontline, where power and agency predominate, but is also dependent on organisational mores, power relationships and resource availability that determine the practice of policy.

Policy implementing agencies such as LAs that provide statutory services to homeless people, operate in a contemporary environment fraught with numerous challenges, one of which is limited resources. This issue of resource shortage remains a perennial issue and may continue to worsen, given the 'hollowing out' of the state which creates a public service gap. The idea of a public service gap makes an analysis of resource scarcity more measurable and can be extended beyond more staff and money.

This chapter has shown how discretion occurs (much of it hidden), the influences that determine its exercise and how (in)formal, discretionary practices shape policies and practices on the ground (Brodkin, 2016). The literature also makes explicit how discretion is manifested, both in terms of hierarchical obedience and organisational capability.

In the next chapter, I will outline the methodology and methods that were employed to explore the research questions.

Chapter 4 – Research Strategy and Design

4. Introduction

The preceding chapter considered the theoretical concepts that framed this study. This chapter presents the methodological and procedural activities of the research which were identified as semi-structured interviews and document analysis.

The major advantage of this multi-source strategy of data acquisition was that 'it produced more contingent and qualified findings' (Brookes and Nelson, 2011:6), that is, not only did the strategy provide answers to questions like, 'did the implementation procedures work?' but also 'what form(s) did implementation take, what behaviours emerged, in what circumstances, and why?' In other words, the methodological strategy concentrated on testing out the theoretical concepts of this study in relation to local practices by using the written and spoken communication of the housing professionals and policymakers.

In the following sections, I explain and justify the research approach, sampling frame and design, the methods of data collection and analysis, the ethical issues I considered and encountered, and quality assurance. The chapter concludes with a brief summary.

To enhance the structure of the chapter, I present the procedures and tools used for each method separately. Yet, the theoretical and methodological approaches are inter-related and are intended to complement each other.

4.1. Research Approach – Qualitative Research Design

To identify the appropriate research approach, I made assumptions which included the units of analysis (research participants' narratives and the policy statements), the type of data required and the methods of data collection. These

assumptions mostly related to the contingency (e.g. nature of housing provision) and practices (governance) of the policy implementation. The research was therefore a process of discovery in which my particular interests were not the outcomes for the applicants themselves (even though these outcomes were reported on in later chapters through research participants' narratives) but in what variously occurred in the LAs being investigated.

To achieve this holistic view, it was important to engage with individual housing professionals to understand their multiple subjectivities, their understandings of the reform landscape, the descriptions of their work as well as their perceptions and beliefs which meant that a constructivist, ontological approach was needed; hence the choice of a qualitative research. These ideas were borrowed from Creswell (2002) who noted that "qualitative research is used to study research problems requiring an exploration and understanding of a central phenomenon" (p.50).

Guba (1981) too suggested that, after identifying the research problem of a study, 'it is proper to select a paradigm where the assumptions are best met by the phenomenon being investigated' (p.76). Besides, in van Esch and van Esch's (2013:215) view, the challenge of identifying a suitable research paradigm raises some pertinent questions:

1. What is the crux of the social phenomenon under investigation?
2. Are human minds creating the social phenomenon or is it part of reality and objective in nature?
3. What forms the basis of knowledge that corresponds to social reality and how best to capture and disseminate such knowledge?
4. What is the correlation between an individual and their environment?

These questions exercised my thinking and led me to identify that the paradigm within which the research was located was the interpretative tradition.

In using qualitative methodology for the research, my aim was to find any links between the theoretical concepts that were identified in the previous chapter and the findings of the research. The advantages of using this approach was that it allowed for specific insights into the nuances of research participants' thought processes, the influences on their professional choices within the decision-making framework, and their motivations.

Qualitative research was also valuable in its ability to fully examine and interpret (sub)cultures in their social contexts which leads to knowledge creation through social interaction with others. In other words, this methodology opened up the possibility to capture process-related features which were very relevant for this type of study that examines governance and service provision.

Notwithstanding the value and capacity of qualitative research for this study, weaknesses and biases remained a significant feature, not least the subjective and contextual characteristics of the approach. Yet, Kvale (1994), in rejecting the positivist argument that qualitative research is unscientific due to the researcher's influence, asserted that qualitative research does not need to be objective, since objectivity in itself is a rather subjective notion. Instead, objectivity in qualitative research should connote "letting the investigated object speak" (Kvale and Brinkmann, 2009:243), that is, allowing the respondents to express the real nature of their experiences. Thus, Kvale (1994) posits that the paradigmatic arguments of quantitative versus qualitative research are baseless given that the essence of empirical research is inter-subjective interaction.

In summary, employing qualitative research allowed for a deeper meaning and understanding of the policy implementation than surveys could have done. It also permitted an examination of the "classic black box to tell us what lies inside"

(Newman, 2002:8). Thus, this approach had the capacity to communicate powerful, empirical information on the success (or otherwise), and real consequences of, the policy implementation for the LAs, rather than mere anecdotes or statistical figures which would not have told the whole story.

4.2. Theoretical Methodology - Argumentation Approach to Discourse Analysis

To complement the interviews, I carried out analyses of relevant documents that were pertinent to the research. Discourse analysis is "the examination of argumentative structure in documents and other written or spoken statements as well as the practices through which these utterances are made" (Hajer, 2006:66). In other words, discourse analysis (or critical discourse analysis) is a form of deconstructive reading to analyse language use (written or spoken) or any medium of communication. Discourse analysis thus "enables access to the ontological and epistemological assumptions behind a (legal) statement, strategy, policy or programme" (Bodea *et al*, 2013:v), as it uncovers the motivations, ideas and interests behind a text, statement, speech or conversation.

The argumentation approach to discourse analysis is related both to the so-called "argumentative turn" in the social and political sciences (Fischer and Forester 1993) and interpretive policy analysis (Yanow 2000; Wagenaar 2011), both of which posit that history and humans are "driven" by collective interpretations of the world (Fischer 2003).

In this study, I have adopted, and adapted, the methodology proposed by Hajer (2006) to produce a variant of discourse analysis - argumentation discourse analysis - which is grounded in Foucault's ideas of discourse, that is, realities being socially constructed. This approach also raises questions of power which emphasises

or excludes certain perceptions or possibilities from the policy process or debate (Hewitt, 2009). As well as constraining discursive freedom, power also champions and controls what can authoritatively be said, heard or done. The hegemonic power that ultimately ensues from these discursive struggles allow dominant discourses to be accepted as 'common sense' narratives (Dabrowski, 2015) and so become easily accepted by the audience.

Argumentation discourse analysis therefore offered a "way of thinking" in the analyses of the documents to produce new insights. By unearthing the discourses, the assumptions, narratives and ideologies became evident, not in terms of rational argumentation, but in terms of the argumentative rationality that policy actors proffered (Fischer and Forester 1993), often through discursive storylines (or linguistic regularities) (Hajer, 2006). Thus, the purpose of the document analysis was to interpret and trace the storylines and metaphors that were identified as sites of discursive struggle (Hajer, 2006), construct a critical narrative of the research problem (Hewitt, 2009) and compare/contrast the interpretation and translations of national policy into local policy.

Storylines are a "generative sort of narrative that allows actors to draw upon various discursive categories to give meaning to specific physical or social phenomena" (Hajer 1995:56) which are used as a kind of shorthand to condense more complex aspects for easy digestion (Hajer 2006). Hajer (1995) also conceive of storylines as recurring figures of speech that dominate public understanding, rationalising and standardising the existing social order. The purveyors of such storylines may be unaware of the discourses that they use (or have created) as they (un)consciously depict their experiences and construct reality. However, by using storylines, they tap into overarching discourses (Wagenaar, 2011) while still having

their own unique interests and multiple interpretations regarding the significance of the storylines (Hajer 2009). The purpose of storylines is therefore to change people's interpretation of what their interests are by shaping new understandings of, for example, the meaning of the welfare state and why it needs to be reformed.

In Foucauldian terms, 'unravelling the process of discourse formation provides an understanding of the flows of meaning and *power* that combine to create the social constructions of reality' (Frouws, 1998:56). Consequently, this study attempts to portray the complex dynamics of the policy development process and then cross-reference it with its implementation (that is, with LA documents) to create a linkage between, on the one hand, the practical and, on the other, the philosophical issues that are embodied in the reform story (Flyvbjerg, 2001).

By highlighting Foucault's philosophy on power in the policymaking and implementation processes, this analysis "illuminat[ed] the mechanisms of government, exposing the social practices and power relations in everyday activities, and highlight[ed] the gap between policy rhetoric and practice" (Hewitt, 2009:10). Argumentation discourse analysis thus resonated with my ontological position and allowed for a dialogue between structure and agency, as well as between policy and practice.

As indicated above, Hajer (2006: 73-74) prescribed a series of ten steps in conducting discourse analysis. This methodological approach supports the identification of the narratives embedded within the selected documents. Detailed below are five of the ten steps that were applied in the analysis of the documents: -

- Sites of argumentation - search the data to account for the argumentative exchange
- Analyse for positioning effects - to show how people or institutions get caught up in an interplay

- Identify key incidents - to understand the discursive dynamics and the outcomes
- Analyse practices in particular cases of argumentation - by going back to the data to see if the meaning of what is said can be related to the practices in which it was said.
- Interpretation - come up with an account of the discursive structures, practices, and sites of production

From the above, it can be seen that Hajer emphasised the significance of social practices (or the 'settings' which regulate the actions of actors) over and above language in his model. Yet language too is a source of power. Hastings (1999) has argued that social relations in the Foucauldian model emphasises, albeit controversially, that the concept of "power is prior to language" (p.10), that is, power relations are reflected in language, but are not a consequence of language. Thus, even though Hajer (2006) and Hastings' (1999) methodological approaches are founded on Foucault's concepts of power relations, they differed in their approach to discourse formation.

4.2.1. The Rationale for Documents Selection

Beneath the formal surface of the policy, I discovered a web of complex but inter-related decision points that were also relevant to the study. The contents of the policy underestimate the degree of structural complexity that develops around policy changes and their implementation. Addressing this complexity and all the other issues in this study would be a difficult challenge, given the number of (historical) statutes and policy initiatives, politicians' speeches and articulated views, the data regarding the structure of implementation policy and informal practices within LAs, all of which would be difficult to analyse or document unambiguously. My strategy for handling these issues is to limit the analysis to a manageable set of data, focusing on the key documents that would help me to answer the research question. Of course, national legislation is only one source of policy directives from central government.

Statutory instruments, administrative regulations and case law are also significant in establishing and pursuing the objectives of a policy, which in turn influence the implementation and outcomes. Because of the need to manage the analysis, not all the stakeholders within the welfare reform debate have been represented. That is not to say their views were not valid or useful, it was just that, for the purposes of this study, I did not think they should be included.

For the purposes of this study, statutes and other statutory regulations, the former prime minister's key speeches on the welfare reform debate, national DHP policy, local government policies to implement contingency funding and allocation of housing were identified as being the most important data for analysing the policy implementation within LAs. These documents formed the critical body of data. The former prime minister's speeches, in particular, were included in the data collection because they contained more substantive or framing language. As the method of analysis was the examination of argumentative structure in documents and other written or spoken statements, it was appropriate that his views, as head of a government that was instituting the reforms, were included in the collection.

For the other documents, a first step was to determine who the participants were and the national or local policies that their roles conformed to within the implementation structure. I completed this part of the assessment by undertaking a role analysis and noting the local policies that were relevant to those roles as they interacted with the policy implementation.

4.3. Procedure for Document Identification and Selection

In this section, I set out the procedure for document selection and their value to this study, how the documents were used, and what part the documents played in this study (Marshall, and Rossman, 1995).

The purpose of collecting and examining the documents was to achieve methodological and data triangulation, that is, the combination of methodologies in the study of the same phenomenon (Bowen, 2009; Corbin and Strauss, 2008). In other words, document analysis validated the interview data to "provide a confluence of evidence that breeds credibility in the research" (Eisner,1991:110). This strategy also permitted an understanding of the meanings and significance of the document contents (Scott, 1990).

The initial step was to identify the documents that were useful in answering the research question while at the same time collecting documents that would be manageable for analysis. Sharp and Richardson (2001) suggest that identifying tensions and their implications is another way of making a discourse analysis of public policy documents manageable. This streamlining of the document search largely defined the scale and scope of this study which is then used to understand the discursive formations in detail (Hewitt, 2009).

The particularities of the policy meant that the parameters for document inclusion were limited to May 2010 (the start of the Coalition Government) and April 2016 (the end of data collection). The only exceptions were some of the homelessness legislations which predated this timespan.

The analysis commenced with a review of key policy documents that related to the policy development to uncover the underlying themes and trends within the policymaking process (Lowndes and Pratchett, 2012). The aim was to determine the extent to which there was coherence in the various policy statements and to uncover their latent meanings. The legislative or public policy documents were distinguished by their ideological and fiscal intents whilst the judicial and local government ones were responsive to legislative intentions and to the practices of local governance.

According to Scott (1990), the appraising criteria for document acquisition typically involve four elements: authenticity (or genuineness of data source), credibility (or typicality/accuracy of the type of documents), representativeness (or reliability/provenance of the relevant documents) and meaning (or clarity and comprehensibility of the documents). Scott considered authenticity to be the most important criterion for all document research, and in this study, it relates to the authorship, utility and date of production to justify its inclusion in the research.

The relevance of the documents to the research problem and the fitness of the document contents to the conceptual framework of this study were also key considerations (Scott, 1990). Being a housing practitioner, the search for the relevant documents was largely fruitful as I was aware of the key documents to select for this study. I obtained fourteen documents from various sources. The nature (official) and type of documents (e.g. speeches by key politicians, policy and guidance documents, statutes and case law) selected served as sources for the examination of the discourses, processes and procedures within the policy development and implementation (see Table 4).

To protect the anonymity of the LAs in which the investigations took place, I have assigned pseudonyms to the organisations as follows: Hawkesbury refers to the north-west London LA, Lismore to the south-west London LA and Ryde to the north-east London LA. For this reason, the sources of the LA documents have also not been included in the References section below. Still, the in-text citations have been credited with the LAs' pseudonyms.

Table 4 – List of Documents for Analysis

Documents selected	Date	Nature and Type of Document e.g. government or organisation document	Document Information	Significance
Speech by former Prime Minister, David Cameron, to Conservative Party Conference in October 2010	2010	Government Public Record	Closing speech of the Prime Minister and Leader of the Conservative Party	The values that the Conservative partners of the Coalition Government subscribed to
Speech on Welfare by former Prime Minister, David Cameron, at Bluewater, Kent on 25 June 2012	2012	Government Public Record	Proposals delivered for more cuts to welfare benefits including possibility of regional benefits policy	Creeping conditionality to reflect budget deficit reversal
Lismore DHP Policy	2014/15	Organisation Policy	Details of organisational processes and other process-related information that provided an understanding of how the DHP grant was distributed in Lismore	Local distribution criteria to improve effectiveness and engender fairness
Ryde DHP Policy	2015/16	Organisation Policy	Details of organisational processes and other process-related information that provided an understanding of how the DHP grant was distributed in Ryde	Local distribution criteria to improve effectiveness and engender fairness
Housing Act 1996 - Part 7 (as amended by Homelessness Act 2002)	1996	Parliamentary Statute	Sets out the five criteria for homelessness duty acceptance	Key homelessness legislation
Department for Communities and Local Government - Homelessness Code of Guidance for LAs - Chapter 17	2006	Government Public Record	Guidance on how LAs should apply the law on homelessness	Statutory guidance on how LAs should exercise discretion when providing homelessness services

Homelessness (Suitability of Accommodation) Order 2012	2012	Parliamentary Statutory Instrument	Matters to be taken into account when determining suitability of accommodation to homeless applicants	To compare with local housing accommodation policies
Case Law - JS & Others v The Secretary of State for Work and Pensions [2013] EWHC 3350 (QB) and Nzolameso v City of Westminster [2015] UKSC 22	2013/2015	Judicial Case Law	Interpretation of Housing Act 1996 in relation to intentionality and suitability of housing location	Contextual data on the practice of homelessness legislation vis-à-vis the policy
Hawkesbury Temporary Accommodation Policy	2015	Organisation Policy Manual	Details organisational processes and other process-related information on accommodation provision in Hawkesbury	Situated structure of accommodation provision
Lismore Temporary Housing Placement Policy	2013	Organisation Policy Manual	Details organisational processes and other process-related information on accommodation provision in Lismore	Situated structure of accommodation provision

Benefit Cap Policy 2012 - Clauses 96 and 97 of the Welfare Reform Act 2012	2012	Government Statutory Instrument	Measures to introduce the cap	The benefit cap policy severs the historic link between families' housing needs and their entitlement
Benefit Cap (Housing Benefit) Regulation 2012	2012	Government Statutory Instrument	Provides the circumstances in which the cap will apply	Amends the Housing Benefit Regulations 2006 to make provision for the cap implementation
National DHP Guidance Manual including Local Authority Good Practice Guide	2016	Government Instructional Policy Manual	Advice on how DHP can be used to provide support to welfare recipients affected by some of the main welfare reforms	Pre-determines and sets criteria for local distribution
Hawkesbury DHP Policy	2015/16	Organisation Policy	Details of organisational processes and other process-related information that provided an understanding of how the DHP grant was distributed in Hawkesbury	Local distribution criteria to improve effectiveness and engender fairness

The inclusion of politicians' speeches was more contentious as these were not laid-down government policy. While these documents were not intended to be examined in this study as policies of the Coalition Government, the framing of the welfare reform argument and the public debate that was generated as a result of these speeches, were important elements of the welfare reform discourse. In other words, politicians' speeches were representative of the importance of the offices the speakers occupied and suggested that the speech narratives were symbolic of the ideology that the government of the day espoused.

Moreover, because politicians' individual intents and views were not part of the White Paper that preceded the Welfare Reform Act 2012, of which the policy is a part, these speeches may have been intended to encourage and get people to buy into the reform rationales and/or ideas during the public consultation period. Hence, key politicians' speeches were important to this study as they served to uncover the underlying assumptions and values of policymakers and I would argue that they were more valuable in this study than the policy itself, which was quite scant and matter-of-fact.

The LAs' policies represented 'an artefact of organisational practices as they pointed to situations, processes, and procedures for service provision' (Bowen, 2009:35). These documents provided an internal perspective of the LAs as well as their organisational values. Besides, the LA documents were selected to compare how (or whether) they fulfilled the spirit and intents of legislative and judicial prescriptions. The documents on homelessness legislation and other national policy provided the statutory context within which LAs are expected to operate whilst fulfilling their housing obligations towards homeless applicants. Case law, on the other hand, offered the judicial interpretations of homelessness law for the LAs and sets precedents for local practice.

The local DHP and housing allocation policies were important to compare their fitness for purpose in practice. Within these policies, LAs gave their own interpretation of national policies and thus provided a sense of the practice and bureaucratic realities within which the research participants operated. These policies also represented the 'language and nature of policy and procedure in the LAs' (Evans, 2006:114).

In line with Scott's (1990) appraising criteria, all the documents were treated as authentic because they had undergone the necessary organisational, legislative or judicial processes and were also publicly available. Having ascertained the authenticity (as well as the credibility and representativeness) of the documents through their 'officialness', the final step was to decipher the meaning of the documents through textual analysis. This task was situated within the historical, political and administrative contexts in which the speakers' and authors' (un)intended meanings were constructed and perceived by the target audience. These meanings will be unpicked in the next chapter.

 Despite the method's utility in providing contextual richness to this study, some limitations still existed. There was one key missing document in the collection - the TA policy from Ryde - which I could not obtain online or through direct request from the LA, despite several attempts. Moreover, the methodological rigour of the documents' production could not be ascertained as they were not produced for academic research purposes.

Notwithstanding this and other flaws of the document analysis method, it still had its advantages over other data collection methods such as interviewing, one of which is its lack of reactivity (Bowen, 2009). Another advantage of this method of data collection was that it facilitated the collection of a large amount of reliable information remotely, especially as obtaining first-hand information (or observing the legislative, judicial or political milieu in which the documents were produced) would have been difficult. Moreover, contamination of the data with my preconceived ideas and personal

values and opinions was minimised, especially as I had no part in its production. As such, the risk of distorting effects, which would have occurred through my presence as researcher, was also minimised.

4.4. Data Management and Analysis – Documents

Each of the documents (or spoken communication) selected told a story or created narratives or codified local institutional practices. With this in mind, I sought to uncover these patterns and messages and to make sense of the policy, in particular, and welfare reform phenomenon, generally. Besides, interpretation of the documents required an appreciation of the values and norms embedded in the social practices within the housing profession which I gained through being an insider.

The documents revealed 'the underlying interests, value judgements and beliefs that are often disguised by the 'factual' claims of policy actors and the arguments that these are used to support' (Scrase and Ockwell 2010:2226). The analytical model took account of the underlying premises of the research, that is, the social construction of realities. For this reason, Coffey and Atkinson (1996) have argued that documents should not be treated as 'firm evidence' of what they report. To put it differently, they contend that documents should be taken seriously but not unquestioningly and should be critically examined to tease out their meanings and purpose. Hence, the contents or "witting" evidence (O'Leary, 2014) of the documents selected were interrogated, as if they were a research participant, to eke out relevant information therefrom.

Each document was analysed individually to determine how the arguments were constructed, whether by storylines and metaphors and/or whether they contributed to or contested the discourses in this study's conceptual framework. The construction of the discursive narratives was also guided by questions on the policymaking processes, how dialogue took place, and how power relations produced dominant discourses and

marginalised others (Hewitt, 2009). Putting these points into practice necessitated a reflexivity on my part as well as my stance on querying the documents in diverse ways.

In essence, the analysis of the LA documents was done in an instrumentalist or realist way, that is, it focused on why and what sort of action was taken, which explained the implementation dynamics in terms of the interests and the power of the actors involved. This strategy was apt as 'different interests were played out during the policy development process and it could be argued that the more powerful actors got what they wanted at the expense of the needs of others' (Hajer, 2006:65) e.g. the LAs and applicants. The analysis found that the most dominant constructions of the policies were 'deservingness', 'welfare independence' and 'rationing'. These narratives will be developed further in the next chapter.

4.5. Theoretical Methodology - Interview

As this research concerned a relatively new phenomenon which had not been previously explored, the challenge was choosing the most appropriate research method that would do justice to the new policy implementation landscape. The high number of variables involved, along with the study aims and objectives, the contingency and complexity of the topic, and the research questions were all important considerations. Variables such as organisational culture and practices, discretion, symbolism and political ideologies and affiliations, all of which might be considered too vague and subjective, were, nonetheless, essential in the success of this study.

This made the interview method the most appropriate for complementing the document analysis. Moreover, in line with Agar (1996 cited in Rhodes, 2013), 'no understanding of a world is complete without representation of those members' voices' (p. 491). Interviewing thus has the capacity to provide empirical, contextual and experiential reflections on reality (Creswell, 1994; Patton, 2002). But whilst the

interviews provided insights into research participants' perceptions and actual behaviours, the knowledge gained was still conditional, meaning that the information obtained was descriptive and my task then was to "unfold the meaning of their experiences" (Kvale,1996:1).

Having identified interviewing as one of the research methods, the next task was to decide on the mode of data collection. I considered individual, rather than multiple or focus group, interview to have the most potential for eliciting rich information. There were two main reasons why I preferred individual interviews. Firstly, the ability individual interviews offered to capture, in all its richness, the participants' perspective of an event or experience (Creswell, 1994). That is, it allowed for a deeper understanding of the implementation arrangements (e.g. mechanisms, opportunities and constraints of the policy) from individual research participants which a group interview would not have permitted as each participant had a different remit within the implementation structure. Besides, the public nature of a focus group interview may have prevented a full and frank disclosure of information from the assembled research participants (DiCicco-Bloom and Crabtree, 2006). Assembling the group too would have been difficult, given the research participants' disparate roles (thus schedules) within the LAs.

Secondly, 'interviewing assumes that the perspective of others is meaningful, knowable, and able to be made explicit' (Patton, 1990:278) and, as most of the internal policy practices of the LAs were not published, interviewing key professionals involved in the implementation process was crucial. Furthermore, given that internal policies were only used to guide officers' decision-making, it was inevitable that key professionals used their individual discretion to practice policy, the nature of which was also being investigated in this study.

Despite these benefits, this technique has its limitations. The most important is that the subjectivity of the information proffered meant that such information could not be 'inter-subjectively repeatable' (van Audenhove, 2007:9).

4.6. Interview Preparation and Data Collection

4.6.1. Interview Guides

Prescott (2011) advised that employing the interview technique as a data collection method requires special kinds of preparation and structure, including the drawing up of a schedule, so that the researcher can maximise the time spent with the research participant. Consistent with this viewpoint, I developed a standardised interview schedule beforehand to guide the conduct of the interview. The interview schedules also ensured that I covered all the topics needed to answer the research questions (Hoepfl, 1997; Robson, 2002; Needham and Mangan, 2016).

I adopted two key principles when formulating the interview questions. Firstly, I kept the research participants' perspective in mind (Neuman, 2003), that is, their work roles. I developed an interview schedule for each research participant's designation (see Appendices 2 to 6), given that the roles within the implementation structure were different. I also prepared a separate introductory sheet which I read out before each interview commenced (Appendix 7). Secondly, apart from deciding on the contents of the interview schedules, I also made decisions on how to sequence the questions. As I was meeting most of the research participants for the first time, the general strategy was for the interviews to start off with relatively straightforward or broad questions which served as an ice-breaker and was intended to put the the research participants at ease.

Specifically, the interview questions were based on the governance of the policy within the LAs (whether through internal policy, officer discretion or legislation) and, being context-specific, the questions were constructed around each participant's role.

The questions surrounded welfare benefit advice and support, employment support, housing options and homelessness prevention, procurement and distribution of (temporary) accommodation to discharge housing duties. To be clear, even though the research sites were the LAs, the research itself was not about LAs as entities but was about LA practices, practitioner experiences, micro-politics and practice meanings that warranted depth rather than breadth of information. In other words, agency was more important than structure (Wagenaar, 2011). Streamlining and identifying the issues in this way assisted me in staying focused and prevented the collection of unnecessary data. This strategy allowed me to get a proper sense of the research participants' practices and experiences in their dealings with the recipients, that is, from the sanctions being imposed on the recipients' housing benefits, to their initial approach for housing assistance during homelessness prevention, to them being made homeless (and accommodated in TA) and all the interactions in between (see Table 2).

To test the draft interview questions, I piloted the housing options manager schedule in Ryde, mainly to check for practicality and relevance. Thus, the pilot exercise served to identify where revisions were needed and to gauge the duration of the interviews. Meanwhile, in anticipation of the responses to certain questions, I developed probes to elicit much fuller responses from the research participant and to capture the nascent meanings that were attached to narratives and/or omissions. At the end of the pilot exercise, I considered some of the questions to be redundant and removing them from the schedule allowed for a shorter, more streamlined guide which ensured a smoother flow of the interviews.

4.6.2. Gaining Access to Research Sites

All LAs in London were part of the sampling frame and, to assemble an adequate sample, I needed to gain access to the LAs through the heads of the housing departments. Using the publicly-available contact details for these postholders, I created a contact list

for twenty-one (out of 33) LAs that I could find online. In August 2015, I sent an email to each of them to request their permission to conduct the research within their LAs. The email also contained an explanation of the importance and objectives of this study. The intention was to choose four LAs, ideally one from each of the four geographical nodes of the city (north, south, east and west). This attempt to vary the data collected was to minimise the impact of cluster effects. It was also in recognition that there was diversity in the costs of local housing and the anticipated dissimilarities in organisational practices.

This access strategy yielded little success as I only received three responses: one of them declined the invitation outright; another consented without much persuasion; however, one of them initially discussed potential participation over the phone and promised to set up a face-to-face meeting to discuss the research objectives further and what their participation would entail. Yet, despite several attempts to make contact by email and telephone to set up the meeting, I met with obstacles. So, I decided to approach the remaining twelve LAs, but my efforts were similarly fruitless.

The obstacles to gaining access were attributed to two apparent reasons. Firstly, the risk of allowing a stranger, which for all intents and purposes I was, to uncover the local policy interpretation and practices of the LAs that may be at odds with the letter and spirit of the policy and legislation; and, secondly, the time and effort that officers would have needed to invest in the interviews which may have conflicted with other commitments at a time of change and transformation (Manaf, Harries and Clare, 2011). These barriers led me to rethink the access strategy and the use of gatekeepers became a viable alternative.

At this juncture, I encountered two individuals who led training sessions on homelessness provision and welfare reform. Both of them happened to be the heads of housing departments in two different LAs in London and, ironically, neither of them had

responded to my earlier invitation to participate. Nevertheless, I discussed the research objectives with them face-to-face and I found them to be accommodating of the idea for me to do research in their organisations. This corroborated my suspicion that my status as a 'stranger' was putting off prospective participation.

I followed up our discussion with an email that included another formal request for permission to interview their colleagues and other members of their staff, which they granted. These individuals thus acted as 'gatekeepers' as it was only through them that I could gain access to potential research participants. However, the use of 'gatekeepers' in research has been criticised as there is a tendency that the researcher could be isolated from other potential research participants. Moreover, critics such as Manaf *et al* (2011) have posited that, given their positions in the organisational hierarchy, 'gatekeepers' may induce individuals to agree to participate, or individuals may think that they are obliged to agree to participate, based on the provenance of the request. Nonetheless, the specificity of the roles I was seeking to be part of this study meant that potential research participants were one of a kind or a select few within each LA.

Despite these limitations and given the high non-response rate from the initial recruitment strategies, I took the opportunity this mode of access presented me as I attempted to assemble a suitable sample. Still, I made efforts to minimise possible sampling biases by reiterating to all research participants that they could withdraw from this study at any time, without any penalty or repercussion towards them.

In the end, I gained access to three LAs in three contrasting geographical locations: Lismore, an inner-city LA in south London with large stocks of social housing, Hawkesbury in the north-west suburbs and Ryde in north-east region of London (see Appendix 8 for site characteristics). Hawkesbury and Ryde have relatively limited stocks of social housing and in terms of population size, Lismore and Ryde are similar compared

to the relatively smaller Hawkesbury. Data obtained from DWP also show that all three LAs had similar numbers of benefit-capped cases, between 1,100 and 1,300 recipients.

The LAs were similar in terms of the legislative framework that governs their activities. However, their peculiar characteristics still provided maximum variation and these differences were in regard to their location, local infrastructure, economy and cost of local housing, administrative structures and organisational discretion, and local population demography, all of which served to explain the divergences in the policy implementation.

4.6.3. Sample Recruitment and Selection

After securing access to the research sites, the next task was to recruit the research participants. Maxwell (1992) advocates that a sampling decision be made with the research design in mind, the feasibility of data collection and analysis, and the goals and conceptual framework of a study. Moreover, as one of the intentions was to obtain breadth of information, it was important that I spoke to different people in the same, and across, LAs. This strategy was meant to add rigour and credibility to the research and provide complementary evidence to the document data (Creswell, 1998; Denzin and Lincoln, 2000). A viable sampling decision, therefore, required considerable knowledge of the contextual setting which my identity as a practitioner provided.

The nature and intensity of data collection in qualitative studies allow for only a small, purposive sample to be assembled. Whereas the characteristic of interest in this study was the research participant's perspectives on the governance of the policy and homelessness provision, the population of interest were 'nodal actors' (Escobar, 2014:5) within the implementation structure. The criteria for selection were that the research participant should be a) employed by the LA in a capacity as manager or officer within the implementation structure, b) involved in the implementation of the policy, and c) willing to participate.

A combination of purposive maximum variation, convenience, and snowball sampling strategies were employed to assemble the sample. Research participants that made up the sample were recruited on role similarity alone and not on any individual characteristics such as gender, ethnicity and educational background. Purposive sampling allowed for the selection of certain roles across and within the LAs to give this study a comprehensive perspective. Thus, the utility of purposive sampling in this study was its ability to achieve representativeness or typicality of the settings and activities. Even though the research sample may be criticised for being small (which was mitigated by document analysis), its selection on account of its typicality and homogeneity may provide far more confidence in the conclusions drawn than if the sample was drawn from disparate or unrelated roles. Besides, even within the research sites, a maximum variation of voices was represented to vary the typicality element.

Convenience sampling techniques, according to Bryman (2008), are used when research participants are 'simply available to the researcher by virtue of its accessibility' (p.183). This technique normally raises questions of representativeness but, due to the difficulties of gaining access to the research sites, I resorted to making use of the chances that presented themselves to gather data from available and willing research participants. Thus, as a housing practitioner in one of the research sites, my colleagues needed little persuasion to volunteer for the research and their contributions proved valuable as, interviewing all of them at the start of the data collection phase, provided me with further insights and ideas for subsequent interviews.

Notwithstanding my recruitment efforts, gaining consent from some of the potential research participants still proved difficult, which I attributed to individuals' wariness of being used as vehicles to evaluate the LAs' implementation policies and processes, a potentially sensitive area for some LAs. I therefore resorted to a snowball

sampling approach and requested those individuals who had already consented to participate, to introduce me to their colleagues within my population of interest.

Through this multi-dimensional strategy, I recruited five officials in each LA. The sample, as in Table 5, consisted of both men and women, and their ranks, which were comparable across the LAs, reflected the extent of their work experiences.

Table 5 - Research Participants' Designations and Roles

Designation	Role
Assistant Director, Operations Manager and Housing Needs Managers	experts in providing the overall policy implementation framework and preparing strategies for the provision of homelessness assistance or prevention
Senior Income Manager	expert in rent collection from benefit-capped social tenants and also arranging support for all cap-affected benefit recipients to enable them to comply with the policy
TA Procurement Managers	experts in procuring TA for homeless applicants
Housing Benefit Managers	experts in applying the benefit cap to unemployed benefit recipients' housing benefit or allowance. Also have responsibility for DHP distribution
Housing Options Managers/Officers	experts in homelessness prevention and providing housing options to the applicants when they are threatened with homelessness or become homeless; also, assessment of housing need
Accommodation Manager	expert in assessing the housing needs of homeless applicants and allocating suitable accommodation
Welfare Benefits Officers	experts in assisting the (homeless) benefit-capped recipients to comply with the requirements of the policy or to find alternative, affordable accommodation or to apply for other welfare benefits that will either exempt them from the cap or alleviate some of its effects

Each research participant was directly involved in the policy implementation structure either by overseeing its implementation as part of the overall organisational processes, or within frontline service delivery. Therefore, this sample provided 'privileged access to the decision-making processes' (van Audenhove, 2007:6) and also offered a broad spectrum of information from those with direct experience of the issues under investigation that no single officer role could have done.

After securing their tentative agreement to participate, I sent the research information and ethical release form (see Appendices 9 and 10) to each prospective research participant, to explain the nature of the study and what their participation would entail. This gave them another opportunity to accept or decline the invitation to participate in this study. All the research participants maintained their willingness to take part in the research and I arranged to interview them in their places of work as these were familiar surroundings that replicated their normal routines.

Pointedly, I refrained from pre-warning the research participants of the interview questions, except the topic of discussion. To have done so would have prevented their natural responses in all their genuineness and spontaneity during the interviews. By tapping into research participants' expert knowledge and obtaining their thoughts, opinions and experiences in this way, I was able to reconcile the 'differences among their responses using their own subjective perspectives' (Bhattacherjee, 2012:19).

4.6.4.   Collection of data - Interviews

Data collection commenced in January 2016 and ended in April 2016. During this time, I conducted 15 in-depth, semi-structured interviews, each lasting between 35 and 75 minutes. I visited the research sites for a total of two weeks to interview the research participants according to their availability.

Spradley (1979:79 cited in Di-Cicco Bloom *et al*, 2006) posited that, in conducting qualitative interviews, relationship building is an important first step and he suggested four stages of an interview encounter. These are apprehension, exploration, co-operation and participation. Building relationships with the research participants was an important first step during the interviews as I was meeting the research participants in Hawkesbury and Lismore, in person, for the first time. The uncertainties of our initial encounters (the apprehension stage) arose from the unfamiliar situation that both parties were in. Once this awkwardness of being in a strange context had been dealt with

through the exchange of pleasantries, the main goal was to get the research participants talking. To gently lead each research participant into the conversation, I opened the interviews with a grand tour question which was aimed at delving into the research participants' subconscious repertoires of knowledge. This semi-structured question reflected the basis of the research and was deliberately non-threatening. Interspersed with the research participants' responses were subtle probes in language used by the research participants themselves, where necessary, to enrich the discussion. Probes functioned as levers to garner more information but without interrupting the research participants' flow of thought. The nature (semi-structured) of the interview questions allowed the research participants the space to discursively express themselves about the ways in which they performed (and constructed) their roles in their everyday encounters.

In the exploration stage, I became engaged in an intense interaction with the research participants, learning, listening and establishing a sense of bonding that would generate more cooperation from them. At this stage, both parties had reached a comfort level in which neither party was wary of offending each other and a sense of approval thus ensued in the interview encounter. I then took the opportunity to ask more sensitive questions of the research participants and sought, wherever possible, to clarify previous information. Being relaxed and comfortable, the research participants even assumed the role of guide and teacher (cooperation and participation stages), using this time to also correct my (previous) misunderstandings (or re-emphasise any earlier points) which enabled me to make sense of their worlds.

Being a housing practitioner with knowledge and experience of the homelessness provision context, I was able to grasp, with ease, the organisational structures, professional jargon, local housing practices, network arrangements, and processes which revealed the idiosyncrasies of local housing provision. I therefore did not need to go

through 'the process of orientation for ritual entrance into research participants' practice worlds' (Escobar, 2014:4). Yet, there were instances when I would deliberately ask the same question in a different way, especially important ones that the research participants had previously evaded or failed to answer adequately, to get as much information from them as was possible or from a different perspective. In other instances, follow-up questions functioned as probes, particularly where research participants' responses had many interesting facets. These probing techniques sometimes proved more valuable than the interview questions that I had prepared as they allowed the research participants to richly recount their work stories that would otherwise have remained untold. The co-production that the semi-structured interview process allowed gave a depth to the data collected that would not have been possible with closed or structured questioning technique. To facilitate a smooth dialogue, the questioning was done in line with the flow of each research participant's repertoires and not the interview schedule.

By the same token, not all the research participants were equally cooperative or had the courage to articulate what they felt, thought or had experienced. Furthermore, in my eagerness to collect data, I may have, unconsciously, given off signals/cues that guided the research participants towards responses they thought I expected. Similarly, in seeking detailed information through probes, there was the danger that the research participants may have embellished their stories, imperfectly recalled events or provided rationalised versions of their previous actions. Some of them also tended to stray off topic with personal anecdotes, which used up valuable interview time. Besides, being a medium of interaction, the context in which the interviews took place also affected the quality of some of the data collected, given that two of the interviews were conducted in open-plan offices that attracted various movements and so served as a distraction.

Despite these limitations, data saturation was achieved which I identified after the research participants were found to be highlighting similar experiences, processes and procedures. This is in line with Seidman's (1998) advice that '*enough* is an interactive reflection of every step of the interview process and is different for each study and each researcher. Therefore, researchers would know intuitively when enough research participants have been recruited when no new information begins to emerge' (p. 48).

4.6.5. Audio-taping and Transcription

During the interviews, I obtained the research participants' permission to use an audio-recording equipment which freed me from taking detailed field notes as I could retrieve the data later, through verbatim transcription. Audio-taping the interview sessions thus allowed me to concentrate on the ongoing synchronous communication and co-production of the interview data (Opdenakker, 2006).

For Bryman (2004), though, the main advantages of using recording equipment during interviews is 'to help correct the natural limitations of human memories which place intuitive glosses on information during interviews and to allow more thorough and repeated examination of what the respondents said' (p.330). Besides, in transcribing the data, extracts of research participants' exact statements became available for use in the final report. More importantly, audio-taping improved the quality of this study in that its authenticity could be assessed in the audit trail.

Notwithstanding these benefits, the presence of an audio-recording equipment may make the respondents sensitive to what they could (not) say or in what detail. This limitation was evident in a few of the interviews where the research participants (even though they had consented to their interviews being recorded) were visibly and vocally reticent with some of the information they provided at various points in the interview. Some even referred to the presence of the recorder as the reason for not doing so. These research participants' reticence to have their views recorded may be attributable

to the 'incontrovertibility of recorded information' (Di-Cicco Bloom and Crabtree, 2006:318), especially where their views contradicted with the establishment's which may have risked their positions within the LA. Notably, even though I had given an undertaking that their information would be anonymised, the research participants were still uncomfortable with the future use, or reach, of the information they provided. Still, in line with my ethical duties as a researcher, I anonymised research participants' voices to protect their identities and that of their employers.

Transcription of the recorded data was contracted out to professional academic transcribers who were tasked with converting, verbatim, the voice (interview) files to textual data. Although this decision was based on medical reasons, one major disadvantage of not carrying out the transcription myself was that I did not get to know the data during transcription (Strauss and Corbin, 1990). However, this shortcoming was largely overcome by the iterative nature of qualitative data analysis which meant that I became familiar with the data as the analysis progressed. Moreover, after the transcripts were returned to me as Microsoft Word files, I listened to the recordings again several times whilst reading the transcribed texts and, where gaps were identified as a result of the transcribers being unable to decipher the professional jargons, I filled these in. I also made notes and critiqued the data inductively.

Replaying the recordings also served other purposes. By listening to the research participants' spoken words, I was able 'to glean meanings through their intonations, (mis)statements, pauses, hesitations, and laughter' (Linton, 2011:15). Engaging with the recordings in this way transported me once again into the interview situation and I could visualise, in my mind's eye, the research participants' gestures and body language that surrounded their words. Reflecting on these situations, I began to recognise from the data the emergence of meaning such as research participants' concerns, insights and

values. This technique thus allowed me some thinking time regarding the issues that were emerging.

In total, there were at least 20 hours of voice data which were transcribed into some 350 pages of textual data. The transcriptions were saved and backed up onto the Microsoft Cloud server, and to assure confidentiality, all access to the data was password-protected, giving me sole access.

4.7. Data Management and Analysis – Interview Data

In this section, I discuss the management and analysis of the transcribed data and provide a detailed account of the analytical processes including identifying the codes and emergent themes. The goals of data management and analysis were to conceptually and physically reduce the data, search for commonalities, comparisons and contrasts (Hesse-Biber, 2011) and then to identify the themes that emerged from the data.

Given the dynamism of the sample, the data collected were of two distinct types: a) detailed descriptions of the mechanisms used to implement the policy (useful for comparing the practices of the LAs) and, b) revelations of the narratives that emerged from the heterogeneous sample (Patton, 2002).

4.7.1. Analytical Approach of the Interview Data

The main analytical approach adopted was that of goal congruence (Meyers, Riccucci and Lurie, 2001), which is defined here as the extent to which central government policy objectives are realised through practice at the local level. Embedded in this approach were elements of governance that emphasised the importance of cognitive and cultural features of organisations and research participants' "sense-making" practices (de Leonardis, 2010:7). As such, the data was manipulated to make sense of the implementation landscape, that is, 'organising them, breaking them into manageable units, synthesising them, searching for patterns, discovering what is important and what is to be learned, and deciding what to tell others' (Bogdan and Biklen, 1982:145). At the

heart of this analytical strategy was data reduction and display (Miles and Huberman, 1994), data categorisation or coding (Saldaña, 2009), and constant comparison (Corbin and Strauss, 2008) of the data.

The analysis also included research participants' accounts and experiences of applicant engagement and interactions and their understanding of the organisational priorities vis-a-vis the policy goals. The policy goals were: 1) to make the system fair and affordable as unemployed benefit recipients will no longer receive more in benefits than the average worker receives in pay; 2) to deliver fiscal savings; and 3) to improve working incentives for those on benefits (Kennedy, Wilson, Apostolova and Keen, 2016:8).

There were other useful analytical procedures that I interspersed with the goal congruence approach for an in-depth inductive analysis. These took the form of data queries such as, what were the common events or taken-for-granted beliefs that were emerging from the data; what were the unique incidents, procedures, or values of the LAs; what strategies were adopted by the research participants to complete their tasks; what kinds of relationships and structures exist within and between the LAs - were these formal, informal, were there power imbalances; how did different research participants within similar designations perceive their work situations or social interactions with the applicants; what kinds of processes were involved in the implementation - were they changes and transformations or new beginnings?

Finally, I measured the impacts of the policy using two variables - organisational and individual factors. The organisational factors captured the extent to which the LAs adopted, and adapted, policies to provide support to benefit-capped homeless applicants and their families whilst the individual factors examined the research participants' interactions with these applicants and the meanings the interactions had for their roles.

4.7.2.   Data Management Tool - NVivo

The analytical process described below was carried out manually, but suitably assisted by NVivo 10 (QSR International Pty Ltd, 2012), a qualitative data analysis software programme which Bazeley (2007) regards as a highly efficient data management tool. After cleaning the transcripts to remove all instances of compromising data that could potentially identify the research participants or research sites, I uploaded all the textual data onto NVivo.

Being a matrix method for analysing qualitative data, NVivo saved processing time, made procedures more systematic and permitted flexibility in relation to revision of analytic processes (Tesch, 1989). It also created an audit trail which is made up of the analytical records of procedures.

Despite its utility in keeping all the data in focus, employing NVivo did not detract from my experience, discipline and training in analysing and interpreting the data, especially as computer-assisted analytical programmes, like NVivo, were designed primarily for data categorisation (Maxwell, 2009).

4.7.3.   Coding of the Interview Data

A combined inductive and deductive analytical strategy was used to decode the interview data (Bloomberg and Volpe, 2015). This approach uncovered the primary message and latent meaning of the data contents which Neuman (2006) referred to as 'words, pictures, symbols, ideas, themes, or any message that can be communicated' (p.219).

Creswell (2009) observes that, while the traditional 'grounded' or inductive approach in social sciences is aimed at allowing the codes to emerge during the data analysis, using predefined or deductive codes is often helpful as it could "address a larger theoretical perspective in the research" (p.187). Within this deductive tradition, therefore, the theoretical concepts of this study functioned as a start list of codes to

begin the analysis. Still, I was mindful that this strategy could have 'narrowed down the range of possibilities for interpretation' (Weston *et al*, 2001:385). Therefore, the inductive, grounded theory technique (Charmaz, 2006; Corbin and Strauss, 2008; Glaser and Strauss, 1967) served to discover patterns, categories and themes that were emerging from the data. So, whilst the deductive approach uses *a priori* codes, the inductive approach involves analysing data with little or no predetermined theory, structure or framework and uses the data itself to derive codes and themes. This dialectical process is comprehensive and time-consuming; yet, it is the most common approach used in qualitative data analysis.

The function of coding is to gain new understandings of a phenomenon and to assemble the big picture (Hoepfl, 1997). I started the coding with the selection of chunks of relevant texts, which Rennie (2006) referred to as 'meaningful units.' The decision to use 'meaningful units', rather than line by line coding, was because it could capture, more adequately, the narratives within the data. This coding format also reflected Bogdan and Bilken's (1982) writings in which they recommended the isolation of the setting, context, and perspectives of the research.

All references to policy governance and implementation strategies were created as labels or NVivo nodes. This type of categorical indexing (Mason, 2010) was used to assemble key-indigenous terms and key-words-in-contexts (Ryan and Bernard, 2003). Labels were thus created for any texts, words or statements that implied the following: homelessness/housing (assistance), housing benefit or local housing allowance, DHP awards, discharge of housing duty, TA or out-of-district housing; research participants' roles, values, identities and attitudes; welfare reform and benefit cap, behaviour change, worklessness; structural issues such as resources, housing affordability, housing supply (or crisis), cost of TA, wage levels, (un)employment and barriers thereto; family structure including household size; city-level variation in local housing market conditions

and other local (non) economic conditions that were perceived to be contributory factors for homelessness including, homeownership and Right to Buy scheme, average local rental prices, share of local affordable accommodation and accommodation vacancy rates.

Still, the iterative, non-linear nature of the coding process also meant that additional codes were identified and added to this list of codes. Once I had completed the initial open coding, I reviewed the list to see if there were any inappropriate codes that I could re-label or merge into existing labels. The goal was to create a descriptive, multi-faceted list of topics to form a preliminary framework for analysis. However, to guard against selective coding (Coffey and Atkinson, 1996), that is, mirroring particular points of view or interests, I coded all the data contents. The 'systematicity' (Durose, 2009:41) of this process allowed for a re-examination and questioning of the data to maintain a 'scientific attitude' (Soss, 2006:101).

Once all the codes had been identified, I then grouped all related codes together into categories and assigned brief descriptive labels to each category. Thereafter, I embarked on a complex process of analysis called axial coding (Strauss and Corbin, 1990) in which links and patterns are identified in the categories to reveal the bigger picture. Thus, ideas and concepts that seemed to relate were grouped together and any duplications were removed. This activity served to reduce the number of codes quite considerably. With this shorter list of codes, I was able to identify the categories or sub-themes. I continued to refine, split, or merge codes where associations, divisions, or overlap appeared in the data. These processes culminated in the identification of sub-themes that were not entirely restricted to the research questions or the theoretical framework.

Despite the extensive literature on coding for theme identification, Glaser and Strauss (1967) contended that the preoccupation with this type of data "fracturing" (as

codes and data chunks) in grounded theory may be at the cost of reporting research participants' experiences fully. Yet, the coding process was useful as, a) it helped me to avoid being caught up in anecdotes and unconsciously adopting research participants' perspectives; b) it prevented me from becoming overwhelmed by size of the datasets; and c) it created a way for me to organise, and interpret, the data (Strauss and Corbin, 1990).

Besides, by constantly assessing whether new codes were needed based on new statements, or whether such statements could fit into an existing node, I also tested my judgement and ability for consistency as I had to guard against inaccurate data assignment and/or incorrect labelling of the codes (Davis and Meyer, 2009).

4.7.4. Analysis of Interview Data

Bevir (2010) believes that to interpret is to bring out meaning so as to understand contexts or explain texts, actions, and social practices. As such, revealing the meanings in the data or the research participants' intentions were themselves attempts to understand or explain their lived experiences, that is, the conscious, subconscious, and unconscious reasons, beliefs, and desires upon which they acted (Yanow, 2006). Consequently, an interpretative analytical framework was ideal, in light of the importance and sensitivity of research participants' roles within the implementation structure and how they understood and articulated their roles.

Bhattacherjee (2012) too reasoned that qualitative data analysis is heavily dependent on the researcher's analytical and integrative skills as well as personal knowledge of the social context where the data were collected. Miles and Huberman (1994), on the other hand, suggested an ethical and investigative attitude towards data analysis. This analysis straddles both arguments and sought to appreciate how the research participants, as reflexive agents, understood, mediated and/or resisted 'the new mentalities of rule' (Nethercote, 2014:1056).

Whilst allowing for the complexities of implementation to be reported, an interpretative analysis of the data still maintained 'the richness and contingency of findings' (Durose, 2009), which I exposed with the use of 'thick descriptions' (Geertz, 1973). Yanow (1996) too argued that thick descriptions illuminate 'the convoluted, intertwined and overlapping webs of meaning that are significant and embedded in the narratives of the actors in the situations described' (p.20). Such narratives reflect how the research participants made sense of the policy and their roles in its implementation through narrative form.

The areas of tension that emerged from the data related to the goals of the policy (e.g. social citizenship), statutory obligations (e.g. case law), resources (reduction in government funding, shortage of affordable housing supply) and individual barriers (e.g. applicants' non-readiness for work). As a corollary, the analysis revealed the operational as well as legal aspects of the policy implementation and the organisational efforts to assist applicants to change their behaviour and move into work. The legal aspects not only included questions of legislative fidelity, that is, do the LAs abide by the homelessness law when dealing with the applicants, but also the quality of any accommodation services provided in fulfilment of statutory housing duties. The quality of accommodation services is also linked to local distributional policies which include the monitoring of budgets to control housing costs.

Some missing information were found in the data, for example, how inevitable budgetary overruns were dealt with or managed by the local politicians and operational executives. Research participants may have also omitted some vital information for reasons such as distrust of my use of the information, reticence about the trajectory of the questioning or their unwillingness to broach a subject despite subtle probes. I attempted to fill some of the gaps in the data by using my knowledge of the profession or from information obtained from publicly-available documents that contributed to the

document analysis. Other silences and information absences were deconstructed as resistance to or agreement with the policy or were implied through cultural assumptions that certain processes were common knowledge within the profession.

4.7.5. Theme Identification

The analysis of the interview data culminated in the identification of three major, and inter-related, themes that captured the complex ways that research participants described and perceived the policy implementation within their roles and daily work activities. According to Creswell (2002), themes are 'similar codes aggregated together to form a major idea in the database and are derived from categories at the highest level of abstraction' (p.267).

The themes identified were: (1) Pressures, Power(lessness) and Control, (2) Criticisms and Resistance, and (3) Emotional Labour and Transformations in Professional Identities. Theme (1) reflects the operational matters linked to the policy implementation. This theme also encapsulates the thrust of research participants' everyday work experiences as they attempt to manage the changes and transformation created by the policy. Theme (2) captures the varying forms of resistance that were displayed during the policy implementation. Finally, theme (3) incorporates research participants' role attributes and the dyadic interactions that they revealed as being important in their contemporary work roles. These narratives were depicted in research participants' identity talk which were portrayed as emotion work, emotional labour and uncertain professional identities. The findings on these themes will be presented in subsequent chapters.

To build upon and support these themes in the report, I used dialogues, metaphors and analogies; identified research participants' quotes from the interview data; located multiple perspectives and contrary evidence; searched for unique details; and recognised tensions and contradictions in individual and collective accounts

(Creswell, 1994: 276–277). The quotations that I selected illustrate the patterns found in the interview data (Needham and Mangan, 2016).

4.8. Ethical Considerations and Approval from the University

In November 2015, I submitted the research outline to the Ethics Committee at the University of Kent. Ethical approval was granted with minor suggestions about the mode of sample recruitment and the length of the ethical release form, both of which were noted and observed.

However, obtaining ethical approval was not an end in itself. My ethical duty of care traversed the whole of the research project (Nunkoosing, 2005), beginning with gaining informed consent from the research participants at which point they surrender some of their civil rights to be a part of the research, all through the data collection phase, on to reporting of the findings and beyond. In keeping with these duties, I explained to the research participants what their participation entailed and what their data would be used for. Even though I did not envisage any physical threats to the research participants, I, nonetheless, made them aware that I was committed to safeguarding and protecting their rights to anonymity and confidentiality as to have done otherwise would have threatened or damaged their reputational or occupational integrity.

Another key point was that the professional transcribers who were tasked with converting the voice files to textual data were contractors of the university and I was assured that they were aware of their ethical responsibilities regarding data protection and confidentiality. Following transcription of the voice files, I cleaned the data by replacing the research sites with pseudonyms. I also removed all inadvertent references to the research participants by name and replaced them with pronouns. Finally, the report referred to the research participants through their designations.

4.9. Researcher Positionality

I now share my positionality as it relates to the research topic, conceptual framework and research process to build trustworthiness with my audience.

During part of the research, I worked as a housing practitioner in a London local authority and I shared in the co-construction of the research context. However, my path to becoming a doctoral researcher in social policy was by no means straightforward. I had worked in several jobs in the banking sector for fourteen years (first in central banking and then in investment banking) but I became disillusioned with the level of wealth that I encountered compared to the levels of poverty in the local areas where I lived. So, I took voluntary redundancy to fulfil a lifelong dream of becoming a graduate and I enrolled at university as a mature student, completing both undergraduate and master's degrees in quick succession. After graduating, I rejected the private sector for the public sector and became a housing/homelessness officer. My career in housing/homelessness lasted eight years before I decided to embark on this project.

My diverse career history gave me the opportunity to work with different classes of people. I have also had the opportunity to manage social relationships and interface with several stakeholder groups. Through these experiences, I have come to respect and appreciate cultural diversity. However, as an immigrant, I have been torn between two cultures: my country of birth (where there is no welfare state and people depend on family and friends for welfare assistance) and Britain (where the welfare state has been a valuable institution).

Having been raised by a single parent with the help of relatives, I was socialised into a culture of personal responsibility, self-reliance and work ethic. These neoliberal values, and the household pressures I experienced in my childhood, instilled in me the desire for knowledge and learning, and encouraged me to seek out higher education to escape relative poverty. These experiences have influenced my perception and

worldview but not to an extent that I was unable to delimit the cultural milieu within which I was operating in this research.

Aside from my personal experiences with relative poverty, there is also research (e.g. Standing, 2011) that suggests that how people are supported into self-sufficiency matters a great deal for societal well-being. Because of my experiences within the tradition of generational solidarity and 'filial piety' (Saunders, 2013), I recognised a subliminal tension in my epistemology between the conservative environment in which I was raised, and which shaped my beliefs about work and welfare (two contemporary welfare reform discourses), and the realities of the English (*ergo* British) welfare state. However, I also recognised that, although I could identify with the reform ontology through my socialised background of market-oriented, personal responsibility and self-reliance discourses, it did not mean that alternative ones, of social justice, social democracy and solidarity, were not also valid. For this reason, I have become more self-conscious as I further realised that I now live in a very different and unparalleled context and so should not be predisposed to feel a certain way about the issues of this research. Consequently, I consider myself to have a progressive viewpoint with regards to the welfare benefit system that I was researching despite my conservative background and socialisation. The transformation in my way of thinking that gave rise to my current epistemology has sometimes caused me to resist or discount some of the 'unfair' ideologies espoused by dominant conservative groups or classes.

Yet, given my personal background and career history, it was possible that my identity as a researcher had some impact on the research process and in my interaction with the research participants. The potential for prejudices were issues that I knew I had to deal with, firstly by acknowledging these biases, and secondly, figuring out how to approach this research objectively. This is because interpersonal relationships are as important in framing knowledge, as are cognitive abilities and behaviours, since the whole

person is the research instrument (Fook and Askeland, 2005). This meant that personal and emotional experiences were crucial in reflection.

The interviews, in particular, proved to be problematic as they drew out particular work-related or emotional issues (such as frustration and dissatisfaction with job role) to the surface, which I was prepared for, but the intensity was unexpected, particularly from frontline staff. I connected with these situations and research participants' feelings to build a new understanding of the phenomenon that was unfolding.

Still, the most daunting task was how to construct an argument that sympathetically represented all the research participants' voices in a meaningful way and in ways that were respectful and reflective of their (unspoken) desires with regard to their involvement in the research. In fact, whilst searching the wider literature, I realised that other researchers and authors had also experienced these dilemmas which various scholars have referred to as 'reflexivity' and 'reflection' (Griffiths, 2009; Schön, 1983). As a researcher, being reflexive means being explicitly self-consciousness about one's social, political and value positions and their influences on the research process (Griffiths, 2009).

Accepting that I straddled two very different positions in the research process, both as co-producer of the data and practitioner who shared the participant community perspective, I was aware that I was an integral part of the research and so I needed to manage these identities very well for a good research outcome. To facilitate this, I did not disclose to the research participants at Hawkesbury and Lismore that I was a housing practitioner myself, except in Ryde where it was obvious as they were my colleagues. This was because my identity as researcher was more important than that of housing practitioner and I was, therefore, more interested in the research participants' authenticity, agency and capability. Yet, my identity as housing practitioner gave me an insider status, or situated experience, which made it easier for me to conduct the

research as I spoke the community language of the professional housing officer. Still, I continued to be alert and self-aware so as not to impose my own thoughts and feelings on the research participants' discursive exchanges during knowledge creation.

Nevertheless, given that all knowledge is socially-constructed (Boghossian, 2006), it was impossible to maintain total objectivity which makes 'bias' an unavoidable reality in research. Indeed, as Griffiths (1998:133 cited in Griffiths, 2009) posited,

> 'bias comes not from having ethical and political positions - this is inevitable - but from not acknowledging them. Not only does such acknowledgment help to unmask any bias that is implicit in those views, but it helps to provide a way of responding critically and sensitively to the research.'

There were two main ways in which I guarded against bias: a) in the development of the research design; and, b) acknowledging my perspectives or position. Moreover, as the project was self-funded, there were no institutional allegiances that I had to abide by in the course of this research. Therefore, the academic virtue that I have exercised throughout this research may provide confidence in the thesis.

4.10. Evaluation of the Research Methodology

In addition to detailing my position as a researcher as a way of tackling the issue of bias, this section details the efforts I made to address and/or control for other potential biases when developing the research design. Methodological theorists have argued that research quality in qualitative studies is assessed by its transferability, dependability, confirmability and credibility, all of which are the markers of trustworthiness (Lincoln and Guba, 1985; Vertalaus and Higginbotham, 2011). Table 6 shows the steps I took to provide verisimilitude to the research.

Table 6 – Quality Assurance Assessment

Criterion	Methods used to improve trustworthiness
Transferability The extent to which the findings could be generalised to other contexts with	Purposive sampling strategy which included maximum variation, snowballing, convenience. This strategy gave a breadth to the different contexts represented (five different roles) in three different geographical locations.

different research participants and situations	Constant comparison across research sites during analysis.
Dependability The extent to which similar findings would be obtained if this study were repeated	Good preparation for fieldwork e.g. piloting interview schedule
	Justification of decisions e.g. methods of data collection, recording, transcription and types of interview questions
	Triangulation of data through in-depth interviews and document analysis
	Use of NVivo to track analytical processes and to create an audit trail. The NVivo process consisted of raw data, data reduction and analysis, data reconstruction and synthesis, process notes, with the intention that others "can reconstruct the process by which the researcher reached the conclusions" (Morse, 1998: 77 in Balan *et al*, 2015).
	Supervisors' guidance on coding process which served to increase inter-coder reliability
	Awareness of limitations
Confirmability The extent to which the findings are neutral and free from researcher bias	Use of open coding that incorporated an inductive approach to data analysis
	Cross checking findings with policy documents
Credibility The extent to which the findings seem believable	Use of multiple sources of data
	Purposive sampling strategy
	Interpretations of the interview data were consistent with the document analysis to reveal themes, patterns and contradictions.
	Presentation of findings at seminars and conference. Provided research participants with a summary of the findings.
	Use of thick descriptions
	Left an audit trail
	Use of grounded theory and constant comparison
	Made no generalisations or major claims when reporting findings

4.11. Conclusion

This chapter has described the methodological and analytical approaches that I followed in this study. In the discussion above, I have examined the research design including the scope, data collection methods and other procedures for this qualitative research.

The methodology employed in this study demonstrated the utility of triangulation as a strategy for obtaining meaningful information to examine the philosophy and practices of various bureaucracies. Using two data collection methods - individual interviews and document analysis - permitted a deeper understanding of the issues under investigation and each method complemented the strengths and weaknesses of the other (van Esch *et al*, 2013). The interviews explored the behaviours, attributes, and practices of fifteen key housing professionals in the policy implementation structure of three LAs in London. The interview data were analysed through a process of reduction and re-combination found in grounded theory to establish categories and themes. Through constant comparison and interpretations, meanings were exposed in the data. The themes that emerged provided an abstraction of the governance processes that were involved in the policy implementation.

Fourteen documents were also selected for the document analysis. These included internal LA policy documents, statutes and case law on homelessness provision, the policy and other related documents and key politicians' speeches. The documents provided complementary and background information of the policymaking and implementation landscape. Analysis of the documents, through Hajer's (2006) argumentation discourse analysis, produced a deeper understanding of the central and local political landscapes within which policy implementation occurred.

In the next chapter, I will present an analysis of the documents selected for the study.

Chapter 5 – Document Analysis

5. Introduction

This chapter aims to answer the first sub-question of this study whereby I sought to interpret or explain the narratives and contents of the documents in relation to the policy implementation. To avoid the false dichotomy of detail versus relevance, I emphasised the symbolic dimensions of the documents as they were not only about the statements they contained but were also emblematic of central versus local politics or, as Hajer (2006) puts it, "institutional politics" (p.68). The welfare policies were symbolic, because they gave a general understanding of how the government of the day constructed the 'problems' of the welfare state and, as symbols, the policies had a central role in emphasising the collective political ideologies towards the welfare state and the efforts to transform it.

The political and ideological beliefs that predominated in the welfare reform discourse consisted of narratives of the welfare dependent, lazy individual which was 'leveraged to problematise the welfare system' so that the 'resolutions' proposed could be easily accepted by the general public (Watkins, 2006:18). However, the validity of this social construction was not the primary focus of this analysis. Instead, the analytical focus is on how the discourses and narratives for implementation became part of local practices and became implicitly imbued (or not) in the housing professionals' consciousness or interpretation in their service delivery.

In the analysis that follows, I present extracts from the documents selected (see Table 4). However, due to reasons of anonymity, the LA documents were omitted from this table, although in-text references are made with the pseudonyms of the LAs. I also omitted the page numbers for the quotations I selected because, although I could identify the page numbers within the Microsoft Office documents, obtaining page numbers from

web pages proved impossible. Therefore, for the sake of consistency, the page numbers have been omitted from all the extracts selected.

5.1. End of something-for-nothing culture

The benefit cap policy was a key part of the government's aim to restore fairness to the welfare benefit system and the assumption was that the behaviours of recipients and social processes can be controlled or modified through policy intervention. Accordingly, it was believed that there existed some cause and effect relationship to achieving behavioural change goals and the principle of conditionality was thought to be the answer (Smith, 2006).

As such, the policy had a number of storylines, one of which emanate from the discourse of 'conditionality' and is reflected in one of the framing concepts of this study – *welfare conditionality*. The key storylines were:

Metaphors	Storylines	Institutionalisation
Conditionality	• Social contract - no rights without responsibilities • Protection of the worst-off in society	• Principle of *less eligibility* • End of something-for-nothing culture

The changes brought about by the policy meant that the welfare state was transformed from one based on entitlement to one based on ability to work which is assessed as absence of certain illnesses rather than the presence of life obstacles. The demanding conditions for needs assistance that the policy has imposed upon the recipients has also transformed social support to a tradition of deservingness according to status of (un)employment. As a result, the government has re-conceptualised the benefit system as a residual concept where certain benefits (e.g. DHP) can only be awarded as a last resort to the unemployed person.

As Chapter 3 shows, the 'residual concept' relies on the principle of *less eligibility*. This principle implicitly requires that those deemed to be deserving of welfare assistance

should not be 'materially better off than the least affluent families among the working poor' (Crookshanks, 2012:99), otherwise it will undermine work incentives and promote long-term dependency. Not only that, it is 'the natural and right order of things' (Wood, 2013). The implication is that welfare benefits should provide the 'barest of provisions for survival' (Cumming and Caragata, 2011:72).

It was conceivable that some larger families did, pre-welfare reform, accumulate substantial sums of money from benefits than some working people did, simply because of the number of people in the households. However, whether they were better off was debatable because the excess amounts they received may have gone towards paying expensive rents, especially in London where the cost of housing is inflated. Even so, the former prime minister signalled the end of the 'something-for-nothing culture' which disregards cost of housing, family composition and size, to only focus on the amounts receivable by some families. This narrative formed a central part of the welfare reform debate, as this extract reveals:

> *"As well as these general questions about the limits of state provision, we need to look at specific benefits. Housing benefit is one of them. The benefit cap is going to put a stop to the most outrageous cases. The families getting £80, £90, £100,000 a year to live in homes that most people who pay the taxes towards those benefits could not possibly afford. Meanwhile those who work in expensive postcodes who aren't on benefits typically have to move further out and commute in to work. So, this is a question that needs to be asked: should those on benefits be financially helped to live exactly where they want to?"* (Welfare Speech by David Cameron, 2012)

Inherent in this kind of storyline is the idea that recipients, as rational actors and calculated subjects, (Pleace, 2016; Newman, 2017), make reproductive decisions in a deliberate manner to use their offspring as 'economic passports' to an affluent lifestyle. Therefore, negative financial incentives were needed to combat this phenomenon. The most effective one that the government could think of was bearing down on housing benefits to force recipients to rethink their family, housing and work options. Amongst

other things, this 'economic liberalist thought suggests that a rational person would move if they are unable to afford their rent' (Carr and Cowan, 2015:84)

Benefit recipients were also viewed as people who take rather than give, who misuse and abuse the benefit system rather than contribute to the public purse. The suggestion, therefore, was that they were receiving 'unjust deserts' which served to delegitimise the whole benefit system. Extreme examples, such as the one cited above by the former prime minister, have been 'deliberately and consistently highlighted by politicians as a means of mobilising the disidentifications of hard-working families and garnering support for the reforms' (Powell, 2015:329).

In this instance, the principle of *conditionality* seeks to reorientate recipients' behaviour towards work and expectations of the welfare state. To be sure, the White Paper (2010b) asserted that there was a need to use conditionality to instil a '*culture of work in households where it may have been absent for generations*', which suggests that there was intergenerational worklessness too within some recipient families. Yet, information gleaned from DWP statistics revealed that, for the period 2008 to 2010, only 1.7 per cent of recipient households contain adults without any collective work history (DWP, 2011). The perceived social and economic costs of such inertia from those recipients were not blamed on the recipients but on a system that allowed them to 'get away with it', as the extract below shows:

> "*This has consequences for us all, not just those trapped on benefits who no longer see work as the best route out of poverty. The social and economic costs of the current system's failures are borne by society as a whole, since worklessness blights the life chances of parents and children and diminishes the country's productive potential*" (DWP, 2011).

The focus on 'inter-generational worklessness' as a threat to national economic security is implicitly attributed to the legacy of ineffective state interventions (Clarke and Newman, 2012). In other words, previous governments have allowed the problem to perpetuate by leaving '*1.4 million people in the UK on an out-of-work benefits for nine or*

more of the last 10 years' (DWP, 2010a:4). The 'disappointment, rage and frustration' (Newman, 2017) that the Coalition Government successfully propagated was supposed to provide a rationality to its reform actions and ensured an acceptance of the narratives of 'welfare dependency' and 'worklessness'.

The normalisation of this type of discourse-coalition means that caring duties (e.g. childcare) are no longer regarded as 'good' for a recipient even though, as earlier indicated, the majority of affected recipients are single parents caring for dependent children. Moreover, the costs and availability of childcare remain significant challenges for parents with young children. Nevertheless, in a legal twist in favour of unemployed parents, the High Court ruled in *DA & Ors, R (On the Application Of) v Secretary of State for Work and Pensions (2017) EWHC 1446 (Admin)* that single parents with children under the age of two are indirectly discriminated against by the application of the benefit cap to their benefits. This is because,

> childcare for children under two is more expensive since children of that tender age need more one-to-one care. Equally, there are difficulties in finding nurseries or child carers who are prepared to take on such young children. ... The cohort of lone parents with children under 2 does have a special status (Paragraph 31).

In other words, the age of a child should be used as a selection criterion for the 'activation' of single parents. This does not equate to selecting by 'ability to work' rather 'as ability to obtain a job'. The government subsequently appealed the decision. In allowing the appeal at 2-1, the Court of Appeal acknowledged that the policy had the potential to create real and substantial hardships for some families. However, there was insufficient evidence to demonstrate that lone parents with children under the age of two faced substantially greater difficulties in obtaining work than those with older children, nor that it was impossible for them to go to work because of their childcare responsibilities (see *R. (on the application of DA) v Secretary of State for Work and Pensions [2018] EWCA Civ 504*). For this reason, there was no discrimination against lone parents

with children under two years old. In other words, the government was not unreasonable in failing to give lone parents with children under two years old an exemption from the policy.

5.2. Discretionary Housing Payments (DHP)

5.2.1. National DHP Guidance Manual including Local Authority Good Practice Guide

In this section, I analyse a key tool of implementation - DHP - in relation to the national guidance provided and its local interpretation. As indicated earlier, the allocation of the grant is accompanied by rules of disbursement, in the form of a national guidance manual, which LAs must have regard to when making individual awards. The national guidance stipulates that DHP grants are not intended to fully mitigate the impact of welfare cuts, as the following extract shows:

> *DHPs can make an important contribution to managing the transition for claimants whilst they make the necessary changes to adapt to the application of the benefit cap. It is important to note that there will not be enough funding to meet every shortfall as a result of the benefit cap, so your LA will need to target this funding at those who need it most.*

In other words, LAs have the responsibility to determine the 'deservingness' of the recipients. The renewed emphasis on 'deservingness', in this context, serves as a bridge between the carrot of conditionality and the stick of sanctions to aid recipients in the transition from welfare to work. But the LAs' freedom to determine deservingness is a qualified one as the purpose of the guidance is to 'help' LAs in their 'discretionary' decision-making which does not correspond with the meaning of 'discretionary':

> *"The good practice guide is intended to help LAs in their decision-making process, however, they have overall responsibility for how DHPs are administered and paid, taking into account the impact of the welfare reforms and any other relevant factors. Due to the discretionary nature of the scheme it is important that LAs are flexible in their decision making."*

According to the Cambridge Online Dictionary, 'discretionary' means 'decided by officials and not fixed by rules.' So, by issuing a national guidance, which also includes

performance management requirements, LAs are essentially being steered from the centre and this, in turn, affects the operational autonomy of housing professionals. Moreover, organisational practices become contaminated with central government ideologies.

What is more, the LAs have been given the onerous option of improving the offer to recipients as the extract below shows:

> *LAs can use their own funds to top up their government contribution by an additional 150% in England... Once an authority's overall cash limit is met, no additional DHPs can be awarded in that tax year. If you award above this limit, you are breaking the law.*

Such 'regulatory technologies' (Fairclough and Fairclough, 2012) signal that LAs are being governed from a distance, through the technology of performance management. In this context, LAs are required to send statistics of how the grants are disbursed, give information on which elements of the welfare reform programmes (e.g. benefit cap, spare room subsidy or local housing allowance reduction/caps etc.) were supported by the DHP awards, value of each award and their intended outcomes. Besides, "*any unspent DHP grant from the government contribution must be returned to the Department at the end of the financial year*" (DWP, 2016:5). These steps are, arguably, put in place to stop LAs from 'empire-building' (Weaver, 2010) by diverting any excess amounts to unintended ends.

Above all, by limiting LAs' ability to top-up the grant fund by a maximum of 150% with their own resources, the government was determined to control LAs' propensity to be generous towards the affected local population which would then undermine the essence and efficacy of the policy. Through this governance mechanism, LAs' activities are thus monitored and regulated so that their actions are aligned with the policy goals and regulations.

The increasing regulation of LAs by government, by and large, represents a failure of thinking about complicated truths and, as Preston-Shoot (2001) suggests, is 'a consequence of a collapse in confidence and certainty in professional practice' (p.7). Moreover, the strictures and practices created by regulation and guidance, allegedly to ease implementation at the local level, may actually frustrate it.

Given the restrictions on its use, which serve a responsive purpose (one that Meers (2015) referred to as 'palliative effect'), DHP ultimately is rationing by selection (Cumming and Caragata, 2011), that is, assistance provided to those recipients who would gain the most from the intervention or the most deserving and needy cases. Despite the utility of the DHP grant for the LAs, its availability may actually be detrimental at the local level in at least two ways. Firstly, it imposes a whole set of expectations and mandates on LAs even whilst the amount of grant receivable remain uncertain. Secondly, rather than requiring LAs to match the DWP allocation, the DHP guidance instead stipulated a 50% premium on the top up amount and thus increased the financial risk on LAs' budgets. And, if taken to its logical conclusion, this top up requirement may divert LA resources to supplementing recipients' benefits, and so transferring the fiscal risk from central to local government.

The DHP scheme, therefore, is the government's attempt to manage the fall-out from the welfare reform programme but, by 'stratifying and classifying' (Wacquant, 2013:8) the grant distribution, the government was further fostering social marginality and inequality, as the extract below from the national guidance suggests:

> "*LAs may wish to make a long-term award until the recipients' circumstances change' and where these are unlikely to change LAs are advised to make indefinite awards as 'making a short-term award will cause them undue distress".*

The question that could legitimately then be asked is: why does the DWP apply the cap to these recipients' benefits in the first place if they are unlikely to meet the requirements of the policy and so could be entitled to financial support indefinitely? This

statement within the guidance reflects the flaws in the policy design as, within it, recipients are either able-bodied or disabled, employed or unemployed; there is no middle ground. Therefore, the suggestion is that the DHP has been put in place as a mechanism to right the wrongs of a strict regulatory regime.

5.2.2. Local Authority DHP Policies

The DHP guidance was translated into local policies by LAs to produce the regimes of governance that the recipients experienced at the frontlines. Within the local DHP policies, the national guidance was rehashed, elaborated or interpreted by LAs to specify how staff should act in different circumstances. The policies also emphasised the discretionary nature of the grant and ranked prevention of homelessness as the highest priority. In the analysis below, I have paraphrased important sections of the LAs' policies instead of selecting extracts from the documents for reasons of protecting LAs' anonymity.

Two key clauses of the national guidance were '*further financial assistance*' and '*housing costs*' but no definitions of these terms were provided. So, it was left to LAs to interpret these terms when drawing up local distribution strategies. The assumption was that LAs have local knowledge of their areas and populations and so are best placed to decide how to distribute the grant equitably. Therefore, they should be free to decide on how grant applications (including information required) can be made; the criteria for an award and the amount payable (subject to the legal requirements of the scheme); and, notification and review of decisions.

The concept of local knowledge, that is, 'the mundane, largely tacitly known, experiential knowledge developed among a community of practitioners in regular interaction around a particular object or focus' (Yanow, 2004: S13) (in this case, the recipients), is important to LAs in the assembly of their implementation strategies. Local authorities, perhaps rightly, have connections to local housing providers (who are the

recipients' landlords) and their responsiveness to individual circumstances makes the grant an effective implementation tool of homelessness prevention. However, the grant's discretionary allocation requirements allow housing professionals to shape the local experiences of the recipients. This corroborates Lipsky (1980), who posited that discretion at the frontline is the manipulation and interpretation of law, and Durose (2009), who described frontline work as 'situated agency' that actively develops strategies based on local knowledge.

The local policies were found to be based on the norm of reciprocity to reflect the contractual nature of DHP awards. This paternalistic social contract ensures an administrative oversight of recipients' behaviours wherein they are expected to fulfil the award expectations or prescriptions and are followed-up on the outcomes. Thus, the subjective and situated nature of an award make housing professionals susceptible to pass judgements on the perceived behaviours of recipients which, in parallel with the policy narratives, reinforces morality on worklessness and personal responsibility and can cause stigma. However, in such circumstances, recipients have no choice but to 'voluntarily' surrender to the moral code of behaviour that housing professionals and, indeed, society has set for them.

As for eligibility priorities, LAs' published policies varied with regard to the target groups. For example, Hawkesbury took a very broad-brush approach in identifying the target groups for DHP assistance. Groups such as those with health and safety concerns (e.g. domestic abuse) and pensioners have priority. Hawkesbury's approach was the result of its decision to put the draft policy out to consultation among its partner agencies and the wide-ranging responses received were incorporated into the final published policy. Lismore was more reform-focused and, as well as the usual provision for disabled people, this LA prioritised families affected by the various elements of the welfare reform. Both Hawkesbury and Lismore also gave very specific information on

the process through which applications would be considered, awarded, monitored and reviewed.

The policies of Hawkesbury and Lismore also stated that the DWP allocation could be topped up, but both indicated that it was not the LAs' intention to do so. The justification within their policies for not seeking to top up the DHP grant was that any expenditure over and above the national allocation would come from the General Fund which would be unfair on local taxpayers as it would be diverting funds from other service areas. This type of cost containment is synonymous with the neoliberal welfare regime that is intent on meagre resource distribution and the 'fairness' narrative that is embedded in the policy narrative.

Ryde, on the other hand, only had a published 'guidance' document and there was no mention of the LA's ability to top the fund up. This was an interesting observation for two reasons: 1) it decreases public awareness and understanding of DHPs, and; 2) it rations the grant by deterrence or ignorance. As indicated in the Literature Review chapter, rationing by deterrence entails making access to services difficult by not passing on important information to the end user (Klein *et al*, 1996 cited in Cumming and Caragata, 2011). Withholding vital information gives the LA power as it seeks to control the information that it puts out in the public domain which thus affects recipients' knowledge of the benefits available to them. Lack of information also makes it more difficult for recipients to predict the utility of making a DHP application that could aid in the longer-term management of their housing problems. Yet, even though Ryde does not have a policy in place, its local implementation strategy is still vulnerable to challenge and, in case of any judicial review application (which the recipients can make if they are unhappy with an (non) award decision), the national guidance provided by DWP would be invoked.

The practice inconsistencies present in the local DHP policies/guidance point to the values and beliefs of the local politicians who make strategic decisions. This, in turn, is reflected in management priorities and the solutions they offer to local people to solve their housing problems. It also reflects the significance of social justice and LAs' propensity to adhere to public administration law on fairness, transparency and equity.

In the remainder of this section, I highlight the unique features of each LA's DHP policy or guidance.

Hawkesbury

The primary qualifying criteria for a DHP award in Hawkesbury are availability of funds and willingness of the recipients to comply with the support being provided by the housing department and the DWP Work Programme. Amongst the assessment criteria set in the local policy were recipients' prudence with their available household budgets and the likelihood that an award would resolve recipients' housing problems.

Moreover, as there was no definition in the national guidance of what '*housing costs*' or '*further financial assistance*' entailed, this LA has interpreted it to mean eligible rent, initial costs of renting a house in the private sector e.g. rent deposits and rent in advance, removal costs and financial assistance to buy basic items to set up home.

Lismore

Lismore's policy stipulates that recipients do not have a statutory right to receive DHP (a move, presumably, intended to thwart recipients' sense of entitlement) but still emphasised the need for each decision to be made according to administrative law, that is, they must be fair, reasonable, and consistent. This is a rehash of the national guidance but how these values would be demonstrated or evaluated was not made clear.

Uniquely amongst the LAs studied, Lismore developed a joined-up approach for the distribution of the grant by bringing together related departments into the distribution network. This was in recognition that those who knew the histories of the

recipients were better placed to make determinations on their DHP applications. By re-allocating the DHP budgets in this way, it could be argued that the grant would be targeted to those most in need, especially those affected by the welfare reforms.

Yet, by only accepting applications from stakeholders e.g. landlords, Citizens Advice, and not from the recipients themselves, Lismore may, inadvertently, be handicapping the recipients in their efforts towards personal responsibility, one of the main aims of the policy.

Ryde

In contrast to Hawkesbury and Lismore's multi-page policies, Ryde only has a two-page guidance for the administration of its DHP and Hardship Payment schemes. Hardship payments are made from the LA's own resources to assist people struggling with council tax payments, which is not implicated in the elements that make up the benefit cap.

Ryde's decision to only develop a two-page guidance, rather than a policy, may be in keeping with one of the tenets of the national guidance, that of allowing flexibility in the distribution of the DHP grant. The guidance also emphasised that the grant was intended to be more of a short-term measure for resolving 'resolvable' housing problems, but recipients still needed to take positive action to improve their circumstances. However, what 'positive action' entailed was not specified. One can only presume that 'positive action' rhymes with the narratives of the welfare reform agenda, that is, 'seeking and taking work opportunities; reducing non-rent expenditure or making up the rent shortfall; or move to smaller, affordable accommodation' (DWP, 2012:9). This means DHP awards in Ryde are geared towards providing sustainable (housing) solutions rather than subsidising cases that would inevitably result in homelessness.

From the above analysis, it is clear that there was some consensus among the LAs in the way the DHP grant was being used and the conditionality attached to awards.

Nevertheless, there remained wide variations in the information provided about the priorities for the dissemination of the grant. The inference drawn from the policies/guidance was that they served as arenas for competing definitions of 'need' and 'deservingness' that guided the imposition of conditionality. These countervailing perspectives run through the documents and reflect the ongoing public discourses, propounded by the policymakers, which expose recipients to what Cumming and Caragata (2011) referred to as "reluctant financial assistance and intense scrutiny based on their perceived deservingness" (p.82).

Furthermore, the LAs appeared to use the freedom granted to them by the national guidance to reflect their organisational and political values and to incorporate coping mechanisms through forms of bureaucratic rationing (Maynard-Moody and Musheno, 2003).

5.3. Homelessness Law

5.3.1. Housing Act 1996 (Part 7) incorporating Localism Act 2011, Associated Policies and Case Law

An important feature of the welfare reform landscape was the wholesale preservation (and reinforcement) of the homelessness law, even though it too forms part of the contemporary welfare system. A closer examination of these and other local policies (especially TA, which I will analyse below) reveal how they affect, and indeed frustrate, the reform objectives and policy implementation. In particular, the homelessness law itself fails to advance one of the central objectives of the policy, that of reducing welfare dependency, as it provides that LAs must fulfil the accommodation needs of homeless people whose households contain vulnerable people (e.g. children), even if they are affected by the policy.

Consequently, to understand the role of the law in homelessness provision, it is important to explore the detailed and unified statutory framework within the English

context. This framework is also supported by case law precedents that were amassed in an era when social protection was an entitlement based on legal citizenship but is still applicable in a post-welfare reform era that is defined by social citizenship. By contrast, the judicial interpretation of the policy in relation to homelessness law have only just begun to appear. For example, some significant court judgements have challenged the restrictive interpretations by LAs of their statutory housing duties towards 'recipients who have become homeless, or threatened with homelessness, as a direct result of the policy' (herein referred to as "the applicants").

As previously indicated, homelessness assistance in England is governed by the 1996 Act which all LAs must abide by. The following sections of the Act (summarised here for convenience) deal with the five criteria with which LAs must be satisfied if they are to accept full housing duty towards homeless applicants, whether benefit-capped or not. The criteria are proof of homelessness (s.175); eligibility for assistance (s.185); priority need for assistance (s.189); 'intentionality' or reason for loss of last settled accommodation (s.191); and local connection to the district (s.198). Related to the above criteria is s.193(1) of the 1996 Act which imposes a duty on LAs to secure accommodation where they are "satisfied that an applicant is homeless, eligible for assistance, has priority need, and are not satisfied that he became homeless intentionally." This means that the legislation itself discriminates amongst those who call on it for homelessness assistance as it is an instrument of last resort that determines 'deservingness'. Therefore, the discursive themes of 'deserving' and 'undeserving' poor have always been a feature of the legislation because those who are deemed to not be legally 'vulnerable' or have contributed wilfully to their homelessness are denied state assistance.

The status of statutory homelessness, which is assigned to applicants who fulfil all five assessment criteria, is enduring until the duty is discharged by the LA through the

offer of settled accommodation. As such, once the status of statutory homelessness has been established, there is no expectation of behaviour change for the applicant to remain entitled to homelessness assistance, even whilst they continue to be capped. This protection provided by the legislation is a powerful antidote to the harshness of the policy. Thus, responsibility for applicants who have failed to change their behaviour to become 'workers' are off-loaded onto LAs from central government. It is important to realise that there may, therefore, be no incentive for the government to actively re-engage the applicants as long as they remain capped.

The ramifications of this situation create a dilemma for LAs who become duty-bound to provide accommodation to the applicants, as was reinforced by the High Court ruling in *JS & Others v The Secretary of State for Work and Pensions [2013] EWHC 3350 (QB)*, from which the extract below was taken:

> "…it seems to us inconceivable that an applicant, whether already housed or seeking housing, could properly be regarded as intentionally homeless where the rent has become unaffordable simply through the application of the benefit cap. Moreover, it would no longer be reasonable to expect them to remain in the accommodation. There will of course be cases where the question arises whether the reduced income resulting from the application of the cap is the real reason for being made homeless, but that does not affect the principle."

This interpretation of s.191(1) of the 1996 Act by the court rests, arguably narrowly, on the question as to whether an applicant's (imminent) homelessness had been caused by an intentional conduct on his part which, I would argue, is the 'but for' question. That is, but for the applicant's deliberate conduct of not abiding by the requirements of the policy to find and keep work, he would not have become homeless, or threatened therewith, as he would have had his full housing benefit entitlement. This argument is premised on the provisions of the Homelessness Code of Guidance 2006 (hereafter, COG) which states that:

> "the intentional homelessness provision reflects a general expectation that, wherever possible, people should take responsibility for their own accommodation needs and

ensure that they do not behave in a way which might lead to the loss of their accommodation".

The COG also gives examples of acts or omissions that might be regarded as intentional which included 'significantly neglecting his affairs by disregarding sound advice from qualified person(s)' (Paragraph 11.20), which in this case are the housing professionals.

Therefore, one could also argue, perhaps hypothetically, that failure to engage with advice, support and opportunities to find and keep work (thus abiding by the behaviour change requirements of the policy), without good reason, is an omission on the part of the applicant, leading to his benefits being reduced, which in turns makes him unable to meet his full rental obligations, and so risking his homelessness. This hypothetical, common-sense argument, though, was immaterial in the court case cited above because, on closer examination of the COG, there are two categories of blamelessness (thus unintentionality): first, where the applicant demonstrates unaffordability of rent liability and, second, where the relevant act or omission was beyond the applicant's control, that is, the reduction in his housing benefit being caused by the application of the cap, not his behaviour (failure to find work) in the run up to the capping of his benefit. Thus, in applying the test of 'intentionality', a LA must identify the immediate cause of the applicant's homelessness and determine, reasonably, whether it is due to the applicant's voluntary and competent agency of events that are within his control or acts or omissions done in good faith.

Even so, good faith or 'good reason' for an act or omission is not defined in the regulations and so it would be improbable to objectively measure its principles. As a result, acts or actions perceived as foolishness, stubbornness, laziness, imprudence or unreasonableness are not regarded as 'bad faith' when determining 'intentionality' in the assessment of a homeless application. Moreover, whilst it is for the LA to determine

'intentionality', any doubt regarding the applicant's acts or omission should be to the benefit of the applicant (COG, 2006).

This analysis of 'intentionality' in relation to (non) deliberate acts and omissions creates a homelessness regulatory regime that does not synchronise with the policy as it does not hold applicants morally responsible for the causes of their homelessness even though the arguments for the cap were mostly moral in nature. A tension thus arises between the policy and the homelessness law, especially as statutory homelessness is 'something that unintentionally happens to the deserving poor' (Spinney, 2006). The implication is that there are different standards for sanctioning applicants in the work sphere against those of the housing sphere, even though both spheres form part of the contemporary welfare system.

Whilst the policy arguments were put forward cogently as being necessary, they, however, disguised such irrational effects arising from, what Preston-Shoot (2001) referred to as, its 'focus on outputs - the behaviour required - at the expense of consideration of the impact it might have on the organisational context' (p.12). However, in the recent past, the government has made attempts to reduce the burden of statutory accommodation provision on LAs, partly in recognition of the shortage of affordable accommodation locally, by making it easier to discharge statutory housing duties into the private rented sector, as long as the accommodation is deemed suitable for the applicant and his household. In this vein, s.148 (3) of the Localism Act 2011 amended s.193 of the 1996 Act as follows:

> *"The local authority shall cease to be subject to the duty under this section if –*
> *(a) the applicant, having been informed by the authority of the possible consequence of refusal or acceptance and of the right to request a review of the suitability of the accommodation, refuses an offer of accommodation which the authority is satisfied is suitable for the applicant".*

This provision was interpreted by LAs as freedom to relocate applicants wherever they could find affordable accommodation. And, given that legislative oversight

on local policy implementation is weak, there are limited opportunities (or willingness) for effective criticism and counter-pressures from central government regarding the structure and operation of local homelessness provision. These gaps created a space for the Courts to provide significant checks on the administrative decisions of LAs.

One notable case that has reshaped and informed LAs' mode of discharging statutory homelessness duties since the policy was enacted was *Nzolameso v City of Westminster [2015] UKSC 22*.   This case centred around sections 206 and 208 of the 1996 Act. Section 206 stipulates that a LA must provide accommodation that is '*suitable*' to the applicants whilst s. 208 requires LAs to accommodate applicants within its districts '*so far as reasonably practicable*'.

In *Nzolameso*, the defending LA, Westminster City Council, had argued that its decision was resource-based but the Supreme Court ruled that the LA's budgetary and resource constraints (that is, severe shortage of accommodation locally and, where available, its costs being prohibitive) were not valid reasons to move homeless families away from their friends and support networks. This case thus reminded LAs of their obligation to provide local accommodation to applicants and, where they could not do so, to give reasons for this departure. The case also required LAs to carefully assess the needs of each member of the household and to safeguard and promote the welfare of any child(ren) in the household. Most importantly, this ruling underlined the importance of processes to fulfil the homelessness suitability of accommodation criteria and how LAs should account for their actions in each statutorily homelessness case, as the extract below shows:

> *"Ideally, each LA should have, and keep up-to-date, a policy for procuring sufficient units of temporary accommodation to meet the anticipated demand during the coming year. That policy should, of course, reflect the authority's statutory obligations under the 1996 Act... It should be approved by the democratically-accountable members of the council... Secondly, each LA should have, and keep up-to-date, a policy for allocating those units to individual homeless households. Where there was an anticipated shortfall of 'in borough' units, that policy would explain the factors which would be taken into*

account in offering households those units, the factors which would be taken into account in offering units close to home, and if there was a shortage of such units, the factors which would make it suitable to accommodate a household further away. That policy too should be made publicly available"

This ruling further reminded LAs that they must have regard to the Homelessness (Suitability of Accommodation) England Order 2012 (Regulation 2) (hereafter, the Suitability Order) and the COG, both of which are statutory regulations. The Suitability Order deals with matters that must be taken into account when determining whether accommodation outside of an applicant's home district is suitable for a household, as shown below:

> *"In determining whether accommodation is suitable for a person, the LA must take into account the location of the accommodation, including:*
> *(a) where the accommodation is situated outside of the district of the LA, the distance of the accommodation from the district of the authority*
> *(b) the significance of any disruption which may be caused by the location of the accommodation to the employment, caring responsibilities or education of the person or members of the person's household"*

But as the homelessness regulations and case law only require that LAs '*take into account*' applicants' circumstances when making accommodation decisions, LAs might only give cursory attention to this obligation. This is because this instruction is, basically, the very lowest level of statutory direction. This weakness in the regulations and the *Nzolameso* ruling means that LAs may fulfil this requirement by simply stating in allocation decision letters that they have had regard to these factors but still proceed with accommodating applicants out of their normal areas of residence. Even so, 'suitability' is not an absolute concept either (Jones, 2014). There can be different standards of suitability, straddling a continuum between ideal accommodation at the one extreme and barely satisfactory accommodation at the other. What the Suitability Order sought to establish, though, was that there should be consistency in assessing suitability of any accommodation offered to applicants. Besides, the stipulation by the Court in *Nzolameso* that local

152

politicians must approve of the LAs' accommodation policies reinforces 'the principle of political accountability downward to the users of public services' (Ferlie, 2001:122) and is intended to hold them responsible for all frontline accommodation decisions.

Yet, as Bumiller (cited in Cowan, 2004) powerfully argued, these legal edicts may give the impression that the law is superordinate to organisational discretion and political expediency, which then creates an illusion 'that law is a source of power and authority, disconnected from other power structures in society' (p. 930). And because the *Nzolameso* ruling or Suitability Order did not prohibit out-of-district accommodation placements, the LAs are still able to make such offers, mainly because of shortages of local housing supply.

Given the prominence of the *Nzolameso* case in directing how LAs should perform/discharge their housing duties towards the applicants, the complexity and 'judicialised' nature of the homelessness process for capped applicants is underlined. Still, this ruling gave hope to some of them who would only previously have expected to be offered accommodation out-of-district, as a matter of course, and so it halted the mass-displacement 'juggernaut' that was steam-rolling benefit-capped homeless people out of their usual areas of residence. The ruling puts the onus on LAs to be transparent about their decision-making in all accommodation allocation situations which, although not a bad thing, still translates into extra resources to fulfil these requirements. Still, this case law reoriented the hitherto discriminatory, inconsistent, and even punitive behaviour towards cap-affected applicants by LAs.

5.4. Local Temporary Accommodation Policies

Drawing up TA policies was one of the key means by which LAs complied with legal and regulatory requirements, a phenomenon that Hunter *et al* (2016) referred to as 'legal simplicity', that is, the translation of national policy (and case law) into local bureaucratic guidelines.

The underlying message of the LAs' TA policies was that allocation of accommodation would be made based on its availability and affordability. Moreover, the policies reflected LAs' local knowledge and interpretation of homelessness law in order to facilitate day-to-day operations. It is this interpretation of homelessness law and organisational culture that the analysis below is focused on.

5.4.1. Hawkesbury

The main objective of the TA policy developed by Hawkesbury was to set out how the LA will allocate TA that had been procured. Remarkably, it was the only LA that explicitly reflected the court ruling in *Nzolameso* regarding suitability of accommodation provided.

Hawkesbury's TA policy also purports to allocate accommodation fairly, taking into account the needs of each member of a household, managing customer expectation and giving reasons for any allocation decision made. But by seeking to manage the expectations of applicants, the underlying aim of the policy appeared to be the conditioning of applicants to the expectation that they could be accommodated anywhere that accommodation could be procured more cheaply. Expectation management thus reflected the kind of coping strategies that the LA had developed to deal with the pressures of accommodation procurement and allocation.

Significantly, Hawkesbury's policy further stated that employed people would be given priority for local housing, second only to families with children at key stages of their education and those with special educational needs. Nevertheless, this policy provision is not an unqualified one, as those applicants who managed to find work but whose jobs are available elsewhere are likely to be offered accommodation away from their local areas. So, whilst the policy statement appears to suggest that 'employed' people would be rewarded for their compliance with the policy by giving them priority for local accommodation, the type of employment that qualifies for such an offer is not

stipulated in the policy. Therefore, those with precarious employment e.g. cleaners or other less technical jobs such as shop assistants, who can easily find alternative employment elsewhere, may not be exempt from the LA displacement strategy. In other words, for this LA, there are different levels of acceptable employment which means that, for some low-income people, the type of work they do leaves them vulnerable to out-of-district accommodation which risks them becoming unemployed again, with the attendant effects on their benefits and income.

5.4.2. Lismore

Lismore, on the other hand, had a policy commitment to 'comply with the relevant legislation and associated case law and to have regard to the COG'. Although it too considered the affordability of the accommodation procurement, it had a more people-focused policy, in that, it endeavoured to ensure that applicants could afford their basic necessities when relocating them to any accommodation.

Moreover, the policy made provision for household suitability assessments to be carried out to determine the type and location of TA that should be offered. In effect, Lismore appeared to be abiding by the guidance in the *Nzolameso* ruling in relation to having a policy in place to assess housing suitability on a case-by-case basis. Yet, this commitment is tempered by the promise that only economically-realistic housing would be provided but it did not specify to whom the accommodation should be economically-realistic - the LA or the applicant.

For if it is the latter, the LA may be acting unlawfully as the High Court in *R (Yekini) v Southwark LBC [2014] EWHC 2096 (Admin)* has held, in regard to Section 206(2) of the 1996 Act, that the defending LA, Southwark Council, had erred in law in believing that it was required to levy at least some charge as a condition of the provision of homeless accommodation.

Section 206(2) of the 1996 Act states:

> *A local authority <u>may</u> require a person in relation to whom they are discharging such functions -*
>> *(a) to pay such reasonable charges as they may determine in respect of accommodation which they secure for his occupation (either by making it available themselves or otherwise), or*
>> *(b) to pay such reasonable amount as they may determine in respect of sums payable by them for accommodation made available by another person.*

The *Yekini* case interpreted s. 206(2) thus: that a LA would use its discretion to either charge nil or peppercorn rent; continue to provide accommodation for the applicant but with the rental obligation for the accommodation being met with financial support from social services; or, the applicants being housed by social services (Peaker, 2014). In other words, the impecunity or shift in purchasing power of a statutorily-homeless applicant (in this case, benefit-capped applicants) is not the determining factor in the provision of suitable accommodation because the homeless status is paramount.

Still, Lismore's policy is not definitive, given that 'account <u>may</u> be taken of the affordability of accommodation when deciding where to provide accommodation.' Leaving open the possibility of meeting the full costs of applicants' accommodation reflects this LA's concerns about operating within the law and the language employed in the policy is much more guarded and therefore defensible. However, because of the shortage of local housing, it too sought to manage expectations by presuming out-of-district accommodation for the applicants.

5.4.3. Ryde

At the time of writing, Ryde did not have a published TA policy. I made enquiries to obtain a copy directly from the LA (others were obtained from the LAs' websites) and was informed that the policy was still being drafted, even though it was more than two years after the *Nzolameso* ruling. This development raises questions about the LA's ongoing decision-making process whilst the policy remained out of operation. This finding not only demonstrates an explicit example of LAs' non-compliance with the law but is also a failure of public accountability on the part of the LA.

5.5. Concluding Analysis

In this chapter, I have presented an analysis of the documents selected. The political rationalities for the policy intervention mean that the thitherto separate domains of welfare and work have been conflated (except for homelessness provision) and were no longer distinct. This is because the reform narratives had actively reconfigured conceptions of citizenship (Henman, 2006). Despite introducing conditionality into social protection through social citizenship, the legal documents showed that the policy link with homelessness protection for cap-affected applicants with young children, was not fractured by welfare reform; in fact, statutory provision has been strengthened.

On balance, the decentralisation of DHP distribution responsibility to LAs advances the general objectives of the policy which, in the words of James Eadie QC, was 'to shift the place of social security' from the 'central government to local government' (cited in Meers, 2017:182). Accompanying DHP decentralisation, however, was a number of stringent disbursement rules. But whilst regulation and practice guidance were meant to ensure national practice standards, the dynamism of organisational practice may give rise to 'their interpretation and understanding within unique situations of uncertainty, complexity and multiple and overlapping relationships' (Preston-Shoot, 2001:11). These issues reflect the impact of resources on decision-making. Therefore, regulations and policy guidance alone may be insufficient to hold LAs to lawful practice in the face of budgetary pressures.

Procedural inconsistencies too emerged amongst LAs which may be attributed to differences in interpretation or local organisational culture. Issues relating to informational and procedural fairness further indicated that discretion may be exercised according to discriminatory practices and not according to appropriate criteria (Gais, 2000).

More importantly, the applicants' noncompliance with the policy is irrelevant when considering their housing needs. Yet still, questions of causation, reasonableness of continued occupation, good faith and affordability, become important factors in the assessment of applicants' homeless applications. Inevitably, the lawfulness of discharging homeless duties towards the applicants is one that the LAs must contend with as their accommodation policies revealed.

In the next three chapters, I will present an analysis of the findings from the empirical interview data. These chapters will answer the remaining two sub-questions. Commencing with the theme of Pressures, Power(lessness), and Control, the next chapter analyses the operational dimensions of the policy implementation and maps out what happened to the applicants through the perspectives of the research participants.

Chapter 6 – Pressures, Power(lessness) and Control

6. Introduction

A theme that emerged prominently from the interview data was a combination of power and control issues in response to the policy requirements which had infused the research participants with an increasing function as control agents. The disciplinary technologies of control that became evident were oriented towards engendering obedience with the policy and local procedures.

Central to this analysis is the interaction of the legal, political and organisational issues which, theoretically, must all converge for a fair and effective service delivery. This combination, however, has inherent elements of conflict and paradox, mainly due to the checks and balances that they impose on the policy implementation landscape, but which is intended to protect the applicants. But there was also evidence of power, especially disciplinary power, over the applicants which pointed to the power relations that were embedded in the implementation process (Fenger and Henman, 2006).

In this chapter, I analyse how the research participants experienced their work (and potential work pressures), especially as the 'broader societal dynamics, other than mere organisational forces, affect the work of housing professionals' (Schott, van Kleef, and Noordegraaf, 2016:585).

6.1. Housing Professionals' Narratives about the Policy and Local Implementation Practices

6.1.1. Increased Homelessness and Risks to Organisation

The interviews revealed that capping the applicants' benefits threatened or caused homelessness which has increased requests for homelessness assistance within

the LAs and put even more pressure on their already-stretched accommodation budgets. For example, the assistant director in Lismore said there was an

> *"increase in homelessness, issues with the cost of TA and TA budgets because people [benefit-capped applicants] can no longer pay the full TA rate and also difficulties in being able to prevent homelessness by finding people [benefit-capped applicants] private sector properties because, you know, a lot of things aren't affordable for a lot of the families"* (Assistant Director, Housing Needs, Lismore).

In other words, the spike in requests for homelessness assistance had been attributed to the reduction in applicants' benefits, which reduced benefits also have become insufficient to meet the costs of the accommodation provided by the LA.

Related to the above, the operations manager in Hawkesbury believed that the only way round the resource dilemma that the housing department faced was to compromise other departments' budgets, as the quote below shows:

> *"And I suppose the housing service, the housing needs service in particular, is reliant on other sections of the council [LA] making savings. Because we can't. Their [applicants] demands are too high."*

The TA procurement manager too in Ryde recognised that although "*there is a massive overspend, which is where a lot of the pressure comes from, actually the TA subsidy is just helping to subsidise what is the true cost of the provision of that accommodation... We're not overspending, you don't make budget provision because you say the subsidy rate should cover it.*" Put simply, making a budget for homelessness provision, with its uncertainties in terms of market vagaries and requests for assistance, to fit the subsidies receivable from government was a folly. This is because, as alluded to above, 1) LAs' statutory duties are no respecter of budgets and 2) the market dictates the price of accommodation not budgets. As such, the research participant appeared to be upholding the values of her professional role as well as the spirit of the law. But what was less clear was how any breaches of organisational policy/strategy were dealt with, especially the inevitable budgetary overruns.

These findings suggest that there is a degree of risk to LAs in relation to providing suitable accommodation to the applicants. In managing these and other risks to the organisations, which includes the risk of blame, the most pressing concern for senior managers appeared to be the risk to the organisations' finances in relation to TA expenditure. As seen in the last chapter, risk management took the form of categorising the applicants when providing accommodation, setting up policies and procedures to enforce organisational imperatives, and monitoring of performance management.

6.1.2. 'Backed into a Corner' as a Result of Resource Constraints

As I have shown above, resources not only mattered, but even more so, by how much. The TA procurement managers in Hawkesbury and Ryde intimated that there were specific local factors that affected their ability to procure accommodation, not least the high proportion of homeownership within their districts. The operations manager in Hawkesbury also noted that,

> *"...as a homelessness service, we have over the years been very dependent on the private rented sector because our social stock is very limited in the borough. Over 10% of the housing in the borough is social stock and just over 20% is private rented."*

This dynamic is important as the tenure mix of 90:10 (90% private ownership and 10% social ownership) points to the need for the LA to look elsewhere for the resource it needed to fulfil its housing obligations. Notably, even though 20% of the stock in private ownership was available to rent, the cost of doing so for the majority of this stock was prohibitive to the LA.

So, when asked how the LA utilised its homelessness prevention budgets to assist the applicants with their housing problems, the operations manager in Hawkesbury said:

> *"In the main...we give it to landlords, basically, ...to stop them evicting someone for rent arrears...that's one of the reasons why. Another one, they're [private landlords] adamant they're going to evict a family and we may give them a sweetener from the prevention fund just to extend that stay for a few more months. To give the family an opportunity to find something else."*

The accommodation manager in Lismore also revealed that they paid

"anything between £2000 to £3500, sometimes depending on how desperately we need this accommodation, ... we've paid up to £4000 before for incentives."

Even though these large *ex-gratia* payments to landlords might seem extravagant and a waste of public resources to an outsider, it served a strategic role and research participants reported that this strategy represented a more economical approach than placing the same applicants in TA, possibly indefinitely, as their benefits (after living expenses) would be insufficient to pay for rents in alternative accommodation. As such, incentives were used to appeal to private landlords' business conscience.

In such cases, the LA seemed to have been 'backed into a corner' as it had statutory duties to perform. However, even with the incentives that the LAs offered, the assistant director of housing needs in Lismore reflected that some landlords were still reluctant to let their properties to the applicants. One explanation she gave was that private landlords may consider the LA "*as a kind of hostile environment*" with its increasing rules and regulations (e.g. health and safety checks, longer tenancies). Therefore, private landlords had become unwilling to remain or enter into business arrangements with the LA.

One would expect that Lismore, being the owner of social housing stock, which exceeded 20,000 (compared to 4,000 each for the other two LAs), would be protected from the impacts of the policy. But it too had a similar number of capped applicants owing to little vacant capacity in its housing stock and so had to look elsewhere in the private sector for available accommodation to house the applicants. Still, cap-affected applicants living in its social housing stock appeared to be protected from the high housing costs in London that affect their counterparts in the private rented sector. This is because social housing is cheaper to rent than similar properties in the private sector, which means that most social housing applicants could still afford to meet the shortfall

in their rent themselves. This finding, therefore, suggests that social tenancy serves as protection from the punitive effects of the policy.

Remarkably, though, to mitigate the anticipated organisational pressures that could arise from any vigorous sanctioning (e.g. eviction) of its social housing tenants who have been affected by the cap, Lismore made a corporate decision to grant indefinite DHP awards to affected social tenants who can show they were unable to meet their rent shortfall themselves. The senior income manager rationalised that this strategic use of the DHP grant was in the best interests of the LA, given that these were households that they would otherwise owe a housing duty towards if they lost their tenancy. This finding suggests that research participants in senior management positions were more organisation-focused and were more interested in the financial impact of the policy for the organisation rather than the applicants, the applicants too benefit from the decision. But the question remains, how would LAs cope with the policy implementation process when DHP grants are phased out, as they will do eventually.

6.1.3. Caught between a 'Rock and a Hard Place' - Transfer of Risks and Responsibilities

Contrary to Taylor-Gooby and Stoker's (2011:14) assertion that the reforms have created 'a shift in responsibility from state to individual', there is evidence that, in the housing sphere at least, public responsibility for the applicants' housing costs remains. The shift, however, has occurred from central government to local government through, as mentioned elsewhere in this thesis, a local subsidisation of the applicants' reduced housing benefits, leading to the potential loss or dilution of non-statutory LA services. As well as providing housing assistance to those applicants whom the DWP had assessed as being 'fit for work' but still 'won't work', LAs were also taking public responsibility for those applicants whom the same DWP had deemed 'fit for work' but were not

considered work-ready or 'employable' by the research participants e.g. those in the work support group of ESA.

In her interview, the housing benefits (HB) manager in Ryde corroborated this finding by explaining that provision will still have to be made "*for people who are very vulnerable and they're just not going to be able to do that [work]. Everybody's got to kind of accept that there will be a cohort of people that you are just going to be subsidising*". This variability in applicants' abilities and capabilities became part of the research participants' discourses which confounded the self-reliance discourse within the policy narrative.

The HB manager in Hawkesbury too expressed similar views but also concern that some applicants

> "*were not taking responsibility and still having children. They're, to an extent, still making the situation worse in that respect. They're not going to walk into a job. Why people aren't seemingly responding to the situation they're in, I can't answer it. I don't know if they are… I mean it'll be different in every case as to quite why they're not able to respond to their situation.*"

This participant suggested that a responsible parent would not continue to produce even more children that they could not afford to support independently which risks poverty and suffering as their income (and thus living standard) is guaranteed to be reduced not increased. These applicants' behaviour or decision-making was thus perceived to be irresponsible as they were very unlikely to move into work quickly or easily to avoid the cap on their benefits.

This research participant's suggestions are in line with the running local narrative that some applicants believed that the policy would not affect them, especially where children form part of the applicants' household. This apparent cultural dimension to these applicants' inertia connotes a strong sense of entitlement to welfare benefits which could have a long-term impact on their household. Accordingly, this finding provided a concrete example of the behavioural problems that policymakers sought to correct by introducing the policy.

164

Meanwhile, the senior income manager in Lismore conceded that they were exercising 'undue forbearance' towards applicants (that is, not taking eviction action against those who fail to meet their full rent payments), even in the face of behaviours that were deemed 'irresponsible' by the research participant e.g. imprudence in household expenditure. This implementation strategy was, as already stated, aimed at mitigating the financial risks that fulfilling statutory housing duties towards these applicants could present for the LA, especially as affordable accommodation is scarce. But when I put to him that there could be other 'hardworking families' (according to the policy narratives) who would jump at the chance to occupy the social housing tenancies that sitting benefit-capped applicants had breached by failing to meet the requirements of the policy and their rental obligations, he agreed that there was a disparity in housing consumption and allocation but reiterated the financial implications to the LA if they decided to evict, *en masse,* capped applicants for failing to pay their rent in full:

> *"I mean you talked about social housing and the fact that people are excluded from social housing because they are working, I guess the question is now, where do the people go that are there now, that aren't paying? If you were to take a very sort of hard-line approach to evictions... with the level of rents in social housing, where they are, and the cost of evicting someone ..., and then refurbishing the property, and then keeping that person that's been evicted in TA, and then putting them back into accommodation again because they're a family and because they can be picked up under various different Acts, they've got a right to rehousing. Probably the cost of going round that merry-go-round is probably far more expensive than just coming out of a position that says, right, we're just going to have some kind of local hardship fund that will support them to stay in that property."*

This research participant's response was very important as, in his view, financial considerations mattered more than moral consideration when implementing the policy, especially towards social tenants. He also suggested that, to effectively implement the policy, applicants would need to be evicted from their social tenancies. Alluding to the folly of doing so, which the research participant termed "merry-go-round", this finding,

essentially, corroborated one of my arguments that the policy is only symbolic as it did not work as intended.

Besides, frontline research participants like the housing options manager in Ryde observed that he was not aware of a big purge or a good taste for finding applicants intentionally homeless if/when they are evicted for rent arrears. The research participant went on,

> *"The 1996 Act hasn't changed and the core essence of intentionality is a deliberate act that is a consequence of a lost accommodation that was available to you. Now that accommodation must be available and reasonable [to occupy]"*

Thus, the interaction of the homelessness legislation with the policy means that, although the property may be available to the applicants, their inability to pay the ongoing rent means that they could not reasonably continue to remain in the property. And because they cannot afford the rent, due to the cap on their benefits, the applicants could not be regarded as 'intentionally homeless' even though, as mentioned above, no amount of nudging would incentivise them to find or take up work opportunities. Therefore, the punitive effects of the policy in curtailing applicants housing benefits for their failure to find and keep work was actually being felt, financially, by the LAs that provide them with alternative accommodation in fulfilment of their statutory duties. For this and other economic reasons, several research participants reported that preventing homelessness was the best strategy for better housing outcomes for applicants. Homelessness prevention entails taking positive steps to maintain the applicants in their current accommodation or assisting them to find cheaper private rented accommodation which the recently-enacted Homelessness Reduction Act 2017 has also codified into law.

However, awarding DHP to some applicants to prevent their homelessness was regarded as a "*deferment strategy*" (Housing Options Manager, Ryde) especially for private sector tenants as this contingent financial support is usually short-term. Again,

research participants' decision-making practices are mostly framed in economic terms, just as they rationalised that their 'spend-to-save' strategies (e.g. incentives to private landlords) were geared towards saving the LAs money when discharging statutory housing duties. In other words, LAs have been caught between a "*rock and a hard place*" (Operations Manager, Hawkesbury) as they have limited options. In this frame, the research participants portrayed a situation in which, as rational actors, they were restricted by the circumstances created by the wider policy environment and by other exogenous factors, e.g. housing availability and affordability, that influenced their practice decisions (Tynkkynen, Lehto and Miettinen, 2012).

6.1.4. Working Relationships with Other Agencies and Departments

The research participants also reported that internal and external communication had improved amongst stakeholders in the implementation network which allowed for a more holistic service to be provided to the applicants and so avoid duplication of service provision. Nonetheless, as far as the defining characteristics of the working relationships were concerned, authority, interests, judgement, values and power imbalances were revealed in various interactions to achieve policy outcomes.

One significant finding was that research participants in the HB departments did not trust the data that was provided by the DWP which informed the LAs of the recipients whose housing benefits were to be capped, uncapped or recapped. These research participants complained that the actual number of applicants, at the commencement of the policy, was, in fact, less than the figures provided by the DWP which meant that the LAs overcommitted resources into plans and services that were not necessary in the end:

> "*We did receive some information from the DWP. It later transpired that that information was really quite inaccurate… Way up. But they also missed some off as well and it was quite difficult because the DWP, in my experience, work quite independently and don't join up their processes with the local authority to ultimately achieve a jointly-agreed outcome*" (HB Manager, Hawkesbury).

"Sometimes I mean what we were expecting to see capped in the first… it all takes poor data as well. DWP told us there'd be about a gazillion people about to be capped and it turned out nothing like that" (HB Manager, Lismore).

This type of silo-working arrangement and poor processes and data management was not unique to the DWP. In Hawkesbury and Ryde, the frontline research participants reported on the struggles they encountered in inter-departmental collaboration, especially with regard to the disbursement of DHP, a key policy implementation tool. For example, the operations manager in Hawkesbury, in criticising the annual occurrence of DHP underspend within the LA, stated:

"I mean we're going to have to probably work on Saturdays now, to get people to come in, to discuss these forms and fill them out and we do this…and it's sickening really - I can use that word. Last year we had to do the same thing. They [HB] passed it back onto us because they can't spend, they've been too rigid in their approach and all of a sudden they want us to get claims from everywhere, like we've got the resources to do that".

The research participant's frustration was evident in her language, especially as the LA was trying to save money wherever it could, but it appeared one of its own departments, HB, was creating situations where money (that is, staff overtime wages) was being spent 'unnecessarily'. Moreover, administration costs were being shifted from the HB department to the housing department. This shift symbolises that, if the housing department wished its clientele to benefit from the supplementary financial assistance, they had to do the groundwork at their own expense to facilitate it.

Despite the operations manager's protestation, though, she conceded that the housing department would indeed do the 'hard' work. Apparently, not for the sake of the applicants or to preserve the LA General Fund but for ideological reasons so that "*the council [LA] does not have to hand the money back to government*" (Operations Manager, Hawkesbury) which they must do at the end of each financial year for any unspent DHP amounts. Her frustrations this time were directed at the absurdity of

having to return a grant that was earmarked for the applicants but which, partly due to the uncertainties of the 'capping process', the HB department had to over-ration, leading to a 'surplus'.

For her part, the operations manager attributed her HB colleagues' prudence to "bad administration" because, even though making preparations for unforeseen circumstances was laudable, even necessary, she saw the problem as one of lack of communication and forward planning which meant that, at the end of the year, "*they [HB] want to throw it [hardwork of doing applications for needy people] all at you*" (Operations Manager, Hawkesbury). This research participant's use of language connotes that the housing department was (and was seen as) desperate for whatever financial resources they could lay their hands on, even if it meant 'swallowing their pride'. More importantly, the lack of consistent collaboration to prevent grant surpluses being returned to DWP (the grantor) could give the impression that the LAs were coping well with the pressures of the policy implementation and so did not need extra funding. In the final analysis, though, the research participant argued that, it is better to spend on known, needy applicants than to hedge on future, unknown or even non-existent applicants.

The above research participant's depiction of DHP management and distribution practices within Hawkesbury did not appear to correspond with that of her counterpart's in the HB department whom I later interviewed and who clearly gave the impression that there were no problems at all with departmental frictions, as the quote below demonstrates. This disconnect raises questions about intra-organisational harmony and highlights the need for the dismantling of silo-working in the interests of the applicants and the LA as a whole:

> "*No. We always spend it all. All of it! Every penny (laughs). There might be threepence left at the end! But no, we always spend it all. Very, very easily and we could easily have spent more! (Laughs). There's no doubt about that! It always gets spent.*"

My reading of her response is threefold: 1) she was in denial of the ripple effects that their DHP management and distribution strategy was having on their colleagues in housing department; 2) she was reluctant to acknowledge her shortcomings, especially not to a researcher whom she had only met a few minutes earlier, and be accused of being inefficient or, worse, maladministering the fund, and; 3) she may not wish to be accused of being on the government's side rather than the LA's and/or not sharing the values and goals of the LA in cutting costs to its General Fund, from whence any budget shortfalls on statutory homelessness provision would eventually come. In other words, although the research participant was not intentionally being deceptive, her 'fictive story-telling' (Snow and Anderson, 1987:1358) was intended to embellish the situation and assert a positive personal image.

But no matter what the rights and wrongs were of the local DHP distribution practices or assessment framework or the resentment it generated amongst colleagues, the fact remained that the HB department, although part of the LA, is under contract to the DWP and is therefore seeking the interests of government rather than the LAs'. And there is a much deeper meaning to the behaviours of the HB research participants and their DHP assessors, apart from their prudence and loyalties. Their behaviour appears to embody and perpetuate the value of 'deservingness' in the way, albeit restricted through regulations, that DHP applications are assessed and awarded to applicants. The value of 'deservingness' is subsumed in the DHP guidance manual and HB research participants were empowered to pass moral judgements on applicants as a condition of receiving supplementary financial assistance.

A similar conflict was reported by the housing options manager in Ryde, but he appeared to accept (or understand) the reasons for the style of local DHP management, assessment and distribution. However, he too was frustrated that he was having to go through 'unnecessary' hoops to carry out his job in preventing applicants' homelessness:

I've got to be honest, in this particular scenario, because the landlord was fed up, they had to treat mine as urgent and I didn't even get directly to the person making the decision and I'm a manager, do you understand? I was told I had to go through a particular person [in HB] that went to that particular person [in HB] and they got back to me and I was just told this, this and this because it is totally discretionary on the person [doing the assessment], and in a way, I can understand because can you imagine how many people would be knocking on that person's [HB] door if they knew they were making the decision. I allow them that, I didn't really want to scrutinise it too much.

This research participant also appeared to indirectly blame the silo-working arrangements and bureaucratic discretion of the DHP assessors which threatened to thwart his efforts of preventing applicant homelessness by delaying and/or obstructing the award of DHP. The bureaucracy with which DHP assessments and decisions were made in Ryde thus lent itself to accusations of 'power madness' and uncertainties in service provision. Even though the research participant appeared to capitulate to the 'clandestine' disbursement arrangements of the DHP grant within the HB department (which the research participant, controversially, believed was necessary for a dispassionate allocation of scarce resources), it still showed an insensitive disregard for joint-working in the interests of their mutual clientele and effective implementation of the policy.

Still, having empathised with the 'difficult position' of the DHP assessors, the research participant, nonetheless, was frustrated because the assessors failed to observe the professional ethic, which entailed not over-scrutinising, delaying or thwarting the recommendations of a fellow professional. This finding reveals that the opacity of Ryde's DHP assessment framework raised doubts, even amongst its own middle management staff, about the amount of discretionary power that was vested in the position of DHP assessor, which also threatened the corporate mission of homelessness prevention. This finding is an ecological example of the turf wars as depicted in Abbott's (1995) account of professional conflict within boundary groups.

For her part, the HB manager in Ryde defended their DHP management and assessment practices by saying:

> *"we have a procedure; we don't have a policy. If we had a DHP policy that would be something we'd need to go through the council every year and we've never wanted to do that because it's too set in stone then, because there will always be those exceptional circumstances that fall outside of your procedure, if you like."*

This research participant's response seemed to suggest that she was more concerned about the bureaucracy of local policymaking (and its potential inconvenience to her department) than the need for administrative fairness in having a published policy. It further suggests that she was wary of opening the system up to legal challenges. While several other explanations were possible, it was clear, as mentioned in the previous chapter, that applicants would find navigating a closed system very hard indeed, especially in unfamiliar settings and under conditions of great stress. Having a published policy, like Hawkesbury and Lismore did, would thus have gone some way into correcting the vagueness and arbitrariness that is associated with this LA's DHP guidance, which increased the housing options manager's frustrations.

These findings reveal that, whilst DHP provided an avenue for softening the impact of the policy, its discretionary distribution at the local level meant there was no unifying practice and these value inconsistencies give credence to the very idea of 'welfare' which 'underlie a public discourse of deservingness and moral judgement, softened by other ideological undercurrents of social justice' (Cumming and Caragata, 2011:82).

The inter-departmental and relational conflicts that I found in Hawkesbury and Ryde were somehow resolved in Lismore where the focus was more on working jointly in the interests of the LA. Part of the LA's DHP allocation from the DWP was reportedly reassigned for homelessness prevention and handed to the housing department where, according to the HB manager, it would be appropriately distributed:

172

"…they [housing department] know their [applicants] family make-up, their history, that kind of thing. So, the council [LA] views it as they're in a better position to decide who has got an opportunity, who might be able to get into work, who can't get into work, how they're impacted by their particular circumstances and then whether or not DHP is the right thing to support them."

As a result of this collaboration, the research participant emphasised that Lismore "*pretty much flatlines across the year*" (HB Manager, Lismore) on its DHP spending, even when it had earmarked and made allowances for unforeseen demands. This meant that all the grant was spent on needy applicants rather than it been returned to the DWP at the end of the financial year.

The ceding of discretionary control of part of the DHP fund to housing department in Lismore did not, however, mean that the HB department also surrendered its controlling power over it. The HB manager disclosed that, although they wrestled with the decision to "*let go of the purse strings to an extent, it was a compelling argument that the people who are best placed to make the decision should be making it*". But he was quick to add that they continued to monitor its distribution to ensure it was done as intended:

"And we can quite happily police that the decisions are being made but we've seen some cases where DHP hasn't necessarily been administered quite as we'd like to see it, but then we've raised that back with Housing [housing department] or TA and said, do you know what, play the game. We've released control of this to you. Please do it appropriately. So, there's a little bit of policing of it, but broadly speaking, everyone's working well to get the best value out of it."

This statement highlights the research participant's bureaucratic power in enforcing the DHP regulations and his role in managing the contradictory logics of reform including negotiating the tension between departmental accountability and a wider sense of moral or ethical responsibility (Newman, 2004).

Moreover, whilst on the face of it handing over 'the purse strings' was a pragmatic step, it also meant that the housing department in Lismore had the onerous task and responsibility of exercising their judgement in every award made, which not only shifts

the problem of rationing from the HB department to the housing department but also makes the latter the subjects of surveillance from their HB colleagues. On the plus side, it suggests that the fragmentation of service provision within the LA was severely curtailed and any potential mixed messages to the applicants regarding behavioural expectations and requirements was minimised.

Clearly, at the heart of this LA's DHP distribution arrangement was relationship management in the form of partnership working and trust. The level of mutual trust and respect for procedures that arose out of such close collaboration at the departmental level represented a form of 'relationship capital' (Kale, Singh and Perlmutter, 2000: 218). The relational capital of joint-working partnership was expressed as shared organisational values and a mutual confidence that neither party would exploit that trust, even if the opportunity arose. Such relational capital, which Hawkesbury and Ryde might do well to observe, is indispensable for the effectiveness of inter-departmental working and, therefore, to the effectiveness of co-production within the LA.

6.2. Housing Professionals' Narratives about the Applicants

6.2.1. Conditionality, Discretion and Rationing of DHP Grant

During the interviews, the research participants created narratives of personal morality about the applicants. These were basically framed to distinguish the 'deserving' from the 'underserving' applicants and one area of implementation that these narratives were implicitly or explicitly manifested in was the distribution of the DHP grants which, as already stated above, the DWP allocates to LAs in mitigation of the policy's effects on the applicants. As such, it could be argued that, rather than supporting applicants through standard welfare benefits, the goal of DHP was to target applicants that research participants deemed to be deserving of supplementary financial assistance. Research participants themselves drew on strict administrative processes to do this 'moral work' (Hasenfeld, 2010). It is important to remember that I did not observe the DHP

assessments directly and I relied on research participants to give a flavour of the various ways that decisions were made on the applications submitted by the affected recipients or on their behalf.

To begin with, the welfare benefits officer in Ryde indicated that DHP assessors in the HB department introduced moralising attitudes in their area of work, an example of which I give below:

> *Because some of the assessors put their own moral judgements on people and say, 'Oh right! You've got a bit of money to spend on treats for the kids!' Because, sometimes, I just say to them [applicants], you know, you're in homeless accommodation, I've visited a hostel, I know it's dire, everybody needs a break. Once a week, why can't you take the kids to the cinema or something?*

In this statement, the research participant suggested that the DHP assessors expected the applicants to use their disposable income towards any shortfall in their rents. Any other allocation of scarce household income is a breach of the moral code of a responsible citizen. This means that the applicants (or their children) are not expected to have any leisure activities or to be a 'normal' part of modern society unless they are able to do so without taxpayer-funded welfare benefits. It also reveals the elasticity of the value of personal responsibility and provided an illustration of bureaucratic control over applicants' lives which is aimed at disciplining and regulating their behaviour.

The research participant positioned the applicants as victims of a harsh welfare regime that sought to break and strip them of any dignity. It also shows that some research participants did not support the disciplinary aspects of the policy. However, the research participant's words could be construed as paternalistic in nature since he portrayed himself as a parent figure that knew what was best for the applicants.

Despite the paternalistic undertones, this research participant again appeared to challenge the moral dimensions of DHP administration. He articulated his concern by indicating that the apparent 'tough love' towards the applicants risked them descending into despair (due to no leisure opportunities) which would be counterproductive for

their wellbeing, a required state that applicants would need to attain if they are to fulfil the policy requirements. But his empathy may not be in keeping with the organisational culture for, in that kind of environment, keeping an emotional distance was critical to the construction of the applicant as the 'other', which in turn sustains the DHP assessors' own ability to function as the 'alloter' of scarce resources.

A common criterion in the LAs' DHP policies/guidance was that each award was made on the condition that applicants made efforts to become self-sufficient or, at least, take responsibility for their personal improvement including attendance at a job club, skills training, budgeting or moving to cheaper accommodation, as represented by the research participants' statements below:

> *"...as long as the family [applicant] will play ball with finding employment they will get DHP. As long as they can evidence that they are seriously job searching or trying to become job-ready." (Housing Needs Manager, Ryde).*

> *"From a housing point of view, it [DHP] can be useful because it gives us more time. So, I'll probably say to Housing Benefit can you give me a couple of months' DHP because I'm going to get this guy a job or he's going to move out of London" (Housing Options Officer, Hawkesbury).*

These data excerpts illustrate that research participants do not always work against applicants as was suggested by Tummers, Bekkers, Vink and Musheno (2014). The finding indicates that, although disciplinary power may still be exerted for any failure to conform to established norms (Flint, 2002), the research participants looked beyond the applicants' perceived behavioural problems that the policy sought to address. Accordingly, from postponing homelessness by negotiating time-limited DHP awards, to providing intensive support to the applicants, to providing temporary accommodation, the research participants did all they could to ensure that, wherever possible, the applicants received some form of assistance. Nevertheless, whilst the social constructs developed by research participants were derived from their subjective and relational experiences, they were still shaped by organisational mores and/or administrative law.

6.2.2. Place, Tenure and Size Discrimination of Accommodation Allocation

In theory, the applicants are protected by legislation with regard to the location and condition of the accommodation that the LAs' offer the applicants in fulfilment of statutory housing obligations. In practice, however, the research participants' statements and actions (past and future) suggested that the applicants were at the mercy of research participants' allocative decisions.

The research found that the individual allocative decisions made by frontline research participants varied amongst the LAs. These research participants' first allocative consideration surrounded availability of accommodation at the time of need, followed by how the use of the procured accommodation stock could be maximised. Still, this rationing was as much for the LA's benefit as that of the applicants, not least because of the *Nzolameso* ruling which stipulated that efforts must be made to improve the wellbeing of the applicants and their household members. An example of this type of suitability assessment was given by the accommodation manager in Lismore:

> *"My officers carry out something called a suitability assessment. With the suitability assessment, we're looking at all the household needs. So, there are a variety of things: key things that generally pop up is children's schooling, maybe children who are doing GCSEs or A level…employment…medical issues…affordability" (Accommodation Manager, Lismore).*

The operations manager in Hawkesbury also explained how suitability assessments were carried out in her organisation thus:

> *"When you do make that decision, 'yes, I've got to perform those [housing] duties,' then you decide, because of the allocation policy we've got for the TA [temporary accommodation], is this family a priority for local placement? So, you look at everything and you say, 'yes/no and that is recorded so that when we come to allocate a property in borough, we only look at the people that we've decided have priority for local placement. Because this list [hand gesture], they don't have priority for in-borough placement and we have told them they don't have priority for in-borough placement, so they cannot expect to have a property in borough because this list of people [hand gesture] have a real need to stay here. Have a real need. So, that's the way that we've dealt with that."*

These statements suggest that the applicants' needs were considered but the concept of 'need' is very much contested, not least because, it is socially constructed by the research participants, following their own interpretation of the relevant local policy, which meant that it was not only different from one LA to the other but for every situation too. This finding mirrors Maynard-Moody and Musheno's (2003) views on citizen-agent narrative, which suggests that the ways that research participants assessed applicants' needs were important in explaining patterns of decision-making in frontline work. In line with the citizen-agent narrative, some research participants brought their own views of fairness and values into their assessment of applicants' needs and used their discretion to do what they believed was right or fair.

Other research participants relied on 'professional intuition' at the initial stage of decision-making (Hunter *et al*, 2012). The research participants' intuitive assessments were socially constructed too, but take into account medical and pedagogical evidence, when allocative decisions were being made.

The allocation or rationing of scarce housing in this way has a key influence on the social and spatial structure of local communities, owing to the unequal power relations between the research participants and the applicants. Drawing on Foucault's (1980) concept of disciplinary power, the reduction in applicants' housing purchasing power has created a reason for the housing professionals to exclude them from their local communities in two main ways - *border control* and *discipline* (Sahlin, 1995 cited in Saugeres, 2000). Border control relates to the 'spatial marginalisation of some of the applicants by only giving them access to accommodation out of their districts of residence. Discipline, on the other hand, entails 'controlling applicants' behaviour by managing their expectations' (p. 589).

This finding evokes the power and control capabilities that frontline research participants have on the destinations of the applicants. These research participants'

discourses left the applicants in no doubt about the LAs' administrative position. It could also be argued that the practice of modifying applicants' expectations was aimed at rationing resources by deterring or discouraging them from seeking assistance in the first place. This indirect rationing strategy is geared towards encouraging the applicants to fend for themselves if they wanted to remain local. Categorising applicants according to status also differentiated them into 'deserving' and 'undeserving' groups which suggested that some applicants were treated more favourably, a phenomenon that Lipsky (1980) termed 'creaming off'.

Nonetheless, some frontline research participants reportedly resented the fact that they were tasked (as per their position in the hierarchy) with informing applicants of their accommodation destinations, which they regarded as "breaking bad news" to those applicants who were ineligible for accommodation placement within the district. In line with the border control discourse, back office research participants determined who was placed in bed and breakfast accommodation (B&B), in and out of the district, who was moved out of B&B into self-contained nightly let accommodation, in or out of district, and who was moved out of London completely in both categories above. As such, the power and control that these research participants have on the distribution of housing suggests, as per Fitzpatrick and Watts (2010), that they were effectively sanctioning the applicants once again.

The above finding is also consistent with Marcuse's (1987) representation of housing allocation or distribution as a form of oppression in housing. In his view, oppression in housing refers to that

> "aspect of housing that circumscribes opportunities, that dictates roles, that inhibits protest, that subtly produces conformity and acceptance, that undermines resistance, that integrates into a system, makes tolerable a system, in which the quality of housing is in fact inadequate. It is not the provision of inadequate housing that is necessarily oppressive, but the form in which it is provided, the logic by which it is imposed and accepted" (p.239).

This account by Marcuse, a leading urban planner, aptly described the displacement pressures and experiences that some of the applicants were subjected to as revealed by the research participants. Nevertheless, it could also be argued that the resource shortages have forced LAs to make such drastic decisions.

With affordable housing in London in short supply, the underlying ideology in the LAs' allocative process thus suggests that the applicants can be displaced to make way for the more productive in society who can afford (or be assisted with) the high costs of living in London. Such a system-supporting mechanism of spatial displacement not only affects the applicants' social stability but could also have socio-psychological meanings for them, one being their powerlessness to do anything about what was happening to them. Another less visible and, perhaps, greater harm is 'a dampening of the spirit, a lowering of expectations of any kind of fair treatment or favourable result from a bureaucratic system' (Bennett, 1995:2182).

The findings further indicate that the distributional consequences of applicant profiling can be measured in household upheaval and social disconnection for those on the negative side of the assessment. Lipsky (1984:3) describes this phenomenon of profiling as "bureaucratic disentitlement," an umbrella term he used to describe situations in which obligations to applicants are reduced and circumscribed through largely obscure and 'bureaucratic' (in)actions of local actors. But I prefer the term 'categorical disentitlements' because it entails the management of applicants' expectations, as much as scarce local accommodation according to applicants' deservingness, which makes disentitlement tactics effective. Still, the applicants may already be used to enduring bureaucratic injustices as the cost of survival, and so may be unable or unwilling to perceive the disentitlements as 'actionable injury' (Bennett, 1995:2182) or cause for litigation. The applicants, therefore, watch as others define their life course and their very selves for them (Bennett, 1995). In contrast, other

empowered applicants reportedly agitate for their entitlements and enforce their rights to proper housing provision, as in the *Nzolameso* case.

Apart from managing applicant expectations, findings from the interviews also revealed an approach of mass displacement of applicants, in anticipation of and after the reduction of the cap in November 2016, which the research participants again attributed to resource pressures, as the following quotes demonstrate:

> *"Most clients that have come to us will realise that it's outside of London" (Accommodation Manager, Lismore).*

> *"It's far more serious. Because what we would do before is moving people to Birmingham, places like that. Well, Birmingham's not going to be affordable (laughs) so they're going to have to go further away" (Housing Options Officer, Hawkesbury).*

This systematic marginalisation of applicants from their local communities through price and status was, however, not effected by the LAs alone. Letting agents too were reported to routinely discriminate against the applicants who they saw as a financial risk not worth taking. Instead, letting agents were reported to prefer doing business with working people whose employment status was regarded as collateral for rental payments. This finding is in line with Theseira's (2013) study of the private rental sector in London in which she found that 'some 40% of London landlords reported that they planned to cease letting their properties to welfare benefit recipients and around 30% of them said they would no longer renew some tenancies of welfare-dependent households as they were perceived to be risky customers due to the delays in rent payments and uncertainties about their financial status' (p. 12). The stigma that is thus internalised by the applicants give them limited scope of influence as they are powerless in the commodified housing market, leading to uncertainty and unstable housing (Zappia, 2017).

6.2.3. Paternalistic Practices and Interventions

The interviews revealed that frontline research participants also routinely carried out financial assessments to means-test applicants on their ability to afford their accommodation and their deservingness of any award of supplementary financial assistance from the DHP grant. Research participants' assessment of applicants' financial means served a dual purpose - that of teaching the applicants budgeting skills and the identification of any 'immoral' waste of money, such as spending their benefits on goods and services that were considered non-essential. These morality tests and intrusive administrative inspections also functioned as rationing tools that separated the 'deserving' from the 'undeserving' poor, as can be seen in the following quotes:

> *"As long as we're happy with the financial statement – and when I say 'happy', it's not just what THEY put. We question what they put and stuff like that, you know?" (Housing Options Officer, Hawkesbury).*

> *"We had an example of a benefit-affected household whereby she was saying, I can't pay my rent. And we did the financial statement with her and, on top of the statement, she was talking about this car loan for a ridiculous amount of money. And when our officer said to her, hang on a second, why are you paying for this...? She said, oh well, I've got to pay for that, it's the most important thing" (Senior Income Manager, Lismore).*

> *"I don't have qualms about adjusting forms if people are putting down things, because I don't think people judge accurately what they spend on sensible items anyway. They always tend to underestimate it and so there's room for manoeuvre there to achieve the objective of maintaining their home" (Welfare Benefits Officer, Ryde).*

These quotes suggest that any evidence, or suspicion, of "morally-objectionable financial behaviour" (Terpstra and Havinga, 2001:108) that was displayed by the applicants was enough to punish them by withholding an award of DHP until the applicant changed their behaviour to meet the expectations of the DHP assessors or met the criteria of an award.

This paternalistic approach to financial assessments suggested that the applicants were incapable of managing their financial affairs and so needed supervision and

instruction. This is despite the fact that the applicants were adults who were themselves responsible for their children's 'welfare'. Such hand-holding practices provided justification for research participants' intrusion in applicants' lives (Taylor, Gross and Turgeon, 2016). Thus, the assumption is that poverty can be resolved by teaching the applicants budgeting skills when, in fact, these practices served as surveillance mechanisms to maintain social control.

A more profound explanation, however, is that the frontline research participants' routine use of these types of credibility checks reflects the deep distrust and scepticism, indeed a fear, of 'being metaphorically spare-changed' (Bennett, 1995:2188), that is, a fear of being deceived by the applicants. This 'conservativist' function of financial assessments was as much aimed at protecting the public purse as it was to ascertain whether the applicants had a genuine need. This finding, however, transcended the binary 'deserving' and 'undeserving' categories of applicant need. It was integral to, and emerged, at every level of the policy implementation landscape which transformed into a control mechanism.

Thus, whilst the policy seeks to control the risks of welfare dependency brought about by the alleged generosity of the welfare state, surveillance by the research participants, being "an expression and instrument of power" (Gilliom, 2001:3), situates the assumed risk in applicants' daily lives on how they budget and the efforts they made to become active. And, as the applicants re-present for further assistance, more and more of their daily lives become susceptible to surveillance, thereby robbing them of their 'dignity and humanity' (Maréchal, 2015).

Still, by embedding conversations about household expenditures with behaviour change in bureaucratic talk, research participants were also able to transform these practices from overtly intrusive discussions of private issues into routine requirements in applications for supplementary financial assistance for homelessness prevention

183

purposes. This finding thus demonstrates that the applicants' choice and autonomy in their personal lives have been severely constrained by paternalistic practices.

Remarkably, the findings revealed that financial assessment also afforded the research participants an element of security, protection and distance from those applicants whose needs could not be met (Franklin, 2000), as was explicitly stated by the housing options manager in Ryde:

> *"I say, straight away, show me your income and expenditure, so give the client an income and expenditure form because that is good. What that does it brings a realism to them and what you're doing really is using their own finances against them and saying, look you really can't afford it..."*

This research participant's operational strategy was significant as it served as a tactic to modify applicants' demand and/or was intended to delay, deter or manage their expectations in a pressurised work environment. Hence, the financial assessments served as a coping mechanism, in that, they evidenced applicants' ability to pay their rent and so eased the pressures that applicants put on frontline research participants to sign off financial assistance for high, unsustainable rents. This then absolves the research participants from likely errors that could be made through relying on one's own judgement alone, or from allowing emotion to get the better of them (Franklin, 2000). Moreover, the research participants suggested that, for some applicants, it was a reality-check as it provided tacit evidence of their (in)ability to afford their rent or the top up on their housing benefits.

Despite the ramifications of the paternalistic standardisation of applicants' circumstances, all the research participants denied that household financial assessments involved the surveillance and control of applicants' lives. The HB manager in Lismore laughed off this suggestion and insisted that they only gave the applicants advice on budgeting. He maintained that he did not consider it their role to "*preach to them [the applicants] about not having this, that or whatever. But we will make some suggestions.*" Yet

when I pressed him on the possibility that some applicants may view their advice as intrusive, with the hint that applicants should be free to spend their (benefit) money as they saw fit, his response was clearly paternalistic:

> *"Yes. Some people do say that, but actually you've [the applicant] come to us asking for money so consequently you've made it our business. It's our job to make sure that limited resources are spent appropriately. And if some people can't pay their rent for a very, very valid reason, rather than they've chosen to spend the money on something else, we're going to help that person with the valid reason first. So, we do need to know. And it is our business" (HB Manager, Lismore).*

Whilst rationing of resources may be inevitable in LA administration due to scarcity, this kind of encroachment into the personal affairs of applicants resembled what de Leonardis (2010) referred to as "an invasiveness of welfare bureaucracy" (p.139). It also suggests that paternalistic practices have been normalised towards anyone seeking help from the welfare state. And for those who may resent this kind of intrusion, they may simply avoid seeking help altogether.

6.2.4. In-Work Poverty - Work Does Not Pay

As already mentioned above, one of the political rationalities of the policy was 'making work pay'. Frontline research participants reported that the policy had been partially successful, in that, those applicants who were work-ready, or close to the jobs market, had moved into work. However, despite this headline rhetoric, research participants reported that compliant applicants were still unable to meet their living costs without recourse to benefits. This, the research participants believed, was because the jobs that the applicants attracted were unskilled or low-skilled, low-paid and unstable. The quotes below are representative of research participants' views:

> *"This borough has a very high in-work benefit population. We have, of our working age only, we have half…I think it's about 60% in work, and while our caseload has generally been reducing over the last few years, within that, the percentage of work claims continues to rise. So, …we most definitely have seen a shift of people moving into work while they're still claiming benefits" (HB Manager, Hawkesbury).*

"So, even if, by encouraging the families to go to work, encouraging them to get exempt from the benefit cap, depending on the rent...it is going to be difficult as well for them to manage" (Welfare Benefits Officer, Ryde).

"You know, successfully found some part-time work. And that's sort of like harking back to that other question, 'Why is it that there's more people now in work and on benefits than ever before...' It shows you something's not right there" (Welfare Benefits Officer, Lismore).

The quotes above suggest that the inability to meet the full housing costs that the 'compliant' applicants faced revealed the structural, rather than the attributions to individual irresponsibility, that was suggested in the policy narratives. Therefore, the combination of low wages and high rents obligated the government to make up the difference in 'compliant' applicants' wages, through the award of Working Tax Credit and full housing benefits, as rewards for their compliance.

This finding also means that there would only be a marginal effect (if any) on the overall housing benefit bill in London where rents are higher than in the rest of the country. Therefore, a marked effect on the benefits bill could only be realised where the work incentives are accompanied by wider structural reforms such as pay structures and genuinely affordable housing.

Accordingly, some research participants believed that the policy was a false economy as any expenditure saved in one policy area could easily be shifted onto another. They believed, as quoted below, that the government was making policy on the back of popular, but unempirical, 'truths' that was aimed at furthering their ideological and political aims:

"I mean the government's under to pressure to create savings but the volume of savings that you're going to get from the cap, compared to the administration, it doesn't appear to stack up. It appears to be a political device to get people into work. It's popular, isn't it? It's a vote winner. People like the idea of clamping down on benefit scroungers. Which a lot of these people aren't necessarily benefit scroungers, and that's what's disappointing about it" (HB Manager, Lismore).

"Because what they can always say is, didn't we cut the benefit bill by x billion, but what they won't say is we had to spend x billion everywhere else to try and cope. So, we've probably spent nearly the same amount of money. They'll have made some

savings, but they can say, hand on heart, that that was the benefit bill, the housing benefit bill. This is what it is now, it was this big and now it's shrunk (making lots of hand gestures doesn't help your tape recording does it!). But that's I think how it will pan out" (TA Procurement Manager, Ryde).

6.3. Discussion and Summary

The above analysis corroborates the theoretical concepts of this research, in that, local practices were characterised by *governance, rationing, discretion* and *conditionality* but also disentitlement as a direct result of organisational and resource constraints. Categorical disentitlement, in this sense, reflects the tensions in research participants' decision-making (administrative and managerial) and the principles of resource distribution in the LAs. Yet, the LAs' statutory obligations continued to bind them to the applicants whilst simultaneously diluting the assistance applicants were offered. Moreover, even though the policy's structure is left intact, its value is indirectly diminshed by the presence of the housing safety net.

As the research participants' narratives have shown, many of the applicants (indeed some of the research participants' colleagues) were at the mercy of the DHP assessors and other HB participants who withheld or controlled information and/or imposed discretionary terms on DHP awards that guaranteed that the applicant remained dependent, not only on their good offices, but also on their goodwill.

Local assessment of applicants' housing and financial needs also fit the contours of an organisational backdrop wherein budgetary controls and performance management were more important than applicants' rights. The analysis, therefore, hardly contradicts the conventional wisdom or literature on street-level discretion and organisational behaviour (e.g., Lipsky, 1980; Brodkin, 1997; Maynard-Moody and Musheno, 2003; Evans, 2009). Instead, it reinforces that research participants' discretionary autonomy was circumscribed by performance measurement factors which shape and channel behaviour during the policy implementation. Organisational procedures, tools and rules functioned

as mechanisms of control that shape the use of discretion in predictable ways (Soss *et al*, 2009). Moreover, with implementation strategies being made by mid-level bureaucrats, Soss, Fording and Schram (2011b) have argued that 'the interplay of systems for disciplining applicants (e.g. sanctions) with those for disciplining frontline workers (e.g. performance management) should not be overlooked' (p.205), given their co-dependence.

As 'empowered citizen-agents' (Maynard-Moody and Musheno, 2003:355), research participants used surveillance techniques such as financial assessments to establish social order (Goffman, 1961 cited in Katuna and Silfen-Glasberg, 2014) especially as their gaze framed the applicants as 'immoral' or 'un(trust)worthy'. Financial assessments not only functioned as coping mechanisms, even forms of social control, but were also aimed at limiting applicants' choices and autonomy. These were characteristics that I identified in all the LAs in the sample. Hence, by standardising the treatment of applicants through intrusive measures (albeit couched in humane, advisory ways), research participants maintained order through power dynamics that reduced applicants to an organisational process which ultimate goal was to ration limited resources.

Apart from these realities, the two most influential factors affecting the LAs' accommodation decisions were availability and cost. Accordingly, the amount of help that a research participant can give to the applicants depended, in part, on the resources that were available or to which the research participants had access. Where resources were scarce, but obligations are onerous, research participants implemented the policy in a way that Brodkin (2006) referred to as 'fulfilling the latent political function of balancing promise and practice and absorbing the organisational risks associated with that function' (p.3).

The limits of discretion on research participants' work freedom have also been highlighted since they could not treat applicants as they liked. This finding supports the

conventional wisdom of discretionary provision at the street level, as advocated by Lipsky (1980), Brodkin (1997) and Maynard-Moody and Musheno (2003). It underlined that the research participants' discretion was not limitless but, as indicated above, was circumscribed by legal and organisational forces that shaped and controlled practice. The organisational forces included routines, policies and procedures that are keenly monitored to meet organisational goals. Accordingly, research participants made discretionary decisions in the knowledge that they were being watched, both technologically and symbolically.

Above all, the policy did not fundamentally undermine the notion of public responsibility that was embedded in the concept of the welfare system (van der Veen, 2008). Instead, its implementation raises questions about the concurrent reduction in funding and subsidies to LAs at a time when they were most needed to provide statutory duties (Meers, 2017). Lack of adequate resources have, therefore, forced the LAs to construct their own interpretations of how to discharge their housing duties but with an eye on legal precedence as a form of control. And whilst incidences of tenancy breaches, such as wilful neglect to pay the rent, involve behaviours that are easily identifiable as 'deviant to the norms of responsible behaviour' (Flint, 2002), defining other types of applicant (in)action, family size and structure, or not seeking and keeping employment, for whatever reason, as failure of personal responsibility is more problematic in housing law.

In the next chapter, I analyse how the research participants made sense of their practices and how they dealt with, or resisted, the pressures from the policy for their roles.

Chapter 7 – Criticisms and Resistance

7. Introduction

The dynamics in the policy implementation process, particularly with regard to the protections afforded by the homelessness law, the stringency of the policy and the deficit in services provided by the LAs were defined by resistance; for "where there is [*disciplinary*] power, there is resistance, and yet, or rather consequently, this resistance is never in a position of exteriority in relation to power" (Foucault, 1980:95).

The theme of resistance encapsulates any behaviour or practice displayed by the research participants (or the applicants, through the narratives of the research participants) that goes against the grain of the dominant, political discourses or the policy requirements. The theme of criticism, on the other hand, denotes a form of backlash against the impact of the policy on research participants' abilities to function as true housing professionals. This backlash also represented research participants' rejection of explicit political stereotyping of the applicants who were portrayed as lacking in moral character. Most of all, criticisms were directed towards the gaps in the policy implementation.

The data suggested that the policy created pressures for implementation agencies like LAs which in turn produced significant modifications to the services LAs provided to the applicants. As the policy provides hardly any opportunity for LAs' to display outright rebellion or resistance in applying the cap to applicants' benefit entitlements, the data also revealed that these modifications were in response to the LAs' contestations of the policy objectives. Some applicants too were reported to have contested and resisted the new regime of governance (Dean 1999) by leaving the system

altogether, or by using deviant strategies to circumvent the policy's prescriptions, either because they were unwilling or unable to comply with them.

7.1. Housing Professionals Narratives of the Policy Impact for Local Authorities

7.1.1. Political and Social 'Unaffordability' of the Benefit Cap Policy

The research participants reported that local politicians utilised covert practices of resistance when implementing the policy, especially as it was perceived to be ideologically-driven and in conflict with the values of local welfare provision. This resistance was demonstrated, on the one extreme, by Lismore and Ryde where applicants were assured of accommodation within London (despite its costs) and, on the other extreme, by Hawkesbury where the organisational policy entailed accommodating most of the applicants out of district, principally in the Midlands and north of England, to save money.

In defending their local practices, the housing options manager at Ryde commented that,

> *"They [councillors] find it unpalatable, because they...love their constituents. How could they have gone to their constituents and say..., oh by the way, you voted for me but you know what, we voted to actually send you out to Leeds or Wigan or somewhere, because you know what, you can't afford to live here (laughing). It just doesn't go down well."*

This statement alluded to the unpopularity of the values and intentions of the policy (and its expected implementation locally) with the local political elite. In a similar vein, the accommodation manager in Lismore suggested that local councillors were not acting altruistically (or because of 'love' for their constituents) in deciding to provide accommodation within London. Rather it was for their own political interests as, moving the applicants out of London, means that they would be moving their electoral base and so stood to lose the support of the very people most likely to vote for them. This finding

illustrates, what Carr and Hunter (2008) referred to as, 'the oft-underestimated role of political expediency in the life and death of the social' (p.300).

Again, the apparent 'conservativist' accommodation strategy of Lismore and Ryde may be due, in part, to the high profile of the *Nzolameso* case towards which the LAs were attempting to be compliant. But complying with this case law required additional financial resources to procure local accommodation. These pressures, reportedly, forced local politicians in Ryde to capitulate to the displacement effect of the policy as they soon acquired hundreds of accommodation units out of London. Admittedly, the allocation of these units was based on applicants' desire to move rather than organisational coercion, which 'compliance they would otherwise have had to secure through the threat of accommodation deprivation' (Watts, 2014:795).

Apart from the political implications of displacement, research participants had this to say about the social dimensions of displacement too:

> *"You know, communities, it's all about that. And unfortunately, of course it's those communities that are benefit-dependent that are the ones that will have to go" (Operations Manager, Hawkesbury).*

> *"The cost is actually to do with social, in terms of welfare, child welfare issues...the children are maybe at school, there's disruption, it can cause family breakdown" (Accommodation Manager, Lismore).*

> *"There used to be an agenda a while back, called the Safeguarding Communities, and that was about retaining families within the community...but we've gone a complete circle now" (Housing Options Manager, Ryde)*

The latter research participant, in his frustration, also concluded that the potential damage to families and local communities was one that was not lost on policymakers and he was convinced that "*there's some strategy in government that knows all this. I believe, you don't do this blindly*". This suggested that the displacement strategy that LAs adopted was central government-inspired.

Equally remarkable was a response to my question on the apparent subversion of the policy by the LAs. That is, the LAs were not fulfilling the sanctioning intentions of the policy, a reality the government also appeared to be overlooking:

> *"I think, the government aren't stupid, they must be fully aware that the LAs are not doing exactly as they said they wanted them to do, and in fairness, if the government wanted to be really draconian about it they could quite easily put some criteria around the spend of DHP and really put the pressure on the local government. So, I think to a degree the government has accepted the position of LAs, it probably recognises that there are a certain group of people that do need some kind of ongoing support. I doubt that they'd politically announce that because it would undermine their whole policy, but that's the impression that I get, you know… (Senior Income Manager, Lismore).*

This quote is significant, in that, it suggests that LAs' resistance to implementation indicated that the policy was 'not meaningful for society' (Tummers, 2011:2) or even for the applicants. On this point, this research participant also recognises that some applicants, despite being passed 'fit for work' by the DWP, are unable to comply with the policy requirements and would therefore need ongoing support. It also suggests that the policy's fitness with the organisations' mission, as local welfare providers, was incompatible with the goals of the policy. This pattern of reluctant commitment and resistance was common amongst the LAs and so could not be explained away as exceptions to the rule. It, therefore, suggested that such practices of resistance had been institutionalised.

7.1.2. 'Like Hole in the Doughnut Surrounded by Belt of Restrictions' – Calls for Changes in Homelessness Law

Patently, national legislation is a powerful tool for curtailing the power and authority of LAs but the issue of overlap between the policy and homelessness law has significant consequences for LAs. This reality informed research participants' calls for a comprehensive reform of the Welfare State to include homelessness law, given that LAs' discretionary room for manoeuvre [in the policy implementation process] was 'like the hole in a doughnut, surrounded by a belt of restrictions' (Dworkin, 1978: 31). These

restrictions emanate from legislative, judicial, political and operational quarters, which are in line with the organisational perspective within street-level bureaucracy thesis (Brodkin, 2008).

Although sanctioning was meant to inspire applicants to take up available employment, some research participants were not convinced that sanctions were an appropriate tool to tackle 'welfare dependency' or whether the policy even served a legitimate function because, as previously indicated, once a housing duty has been accepted the LA has a legal responsibility to provide ongoing accommodation to applicants until they are suitably rehoused. Research participants, therefore, criticised the policy for its incompatibility with homelessness law and regarded it as meaningless. Consequently, the negative motivational thrust of sanctions that the policy aimed to bring about was regarded as rather lukewarm, or even non-existent, given the 'circulating cultural narratives' (Watkins, 2006) amongst applicants about their housing rights. It also meant that applicants were essentially not being sanctioned as the cap, being applied to applicants' housing benefit entitlements, was effectively being overturned by the statutory obligations within the homelessness law. The research participants thus interpreted the perceived disciplinary power of the policy as empty rhetoric and token gestures, given the limitations of the policy (Nethercote, 2014).

Despite the protections afforded by the homelessness law, the interviews suggested that the applicants still lacked control over their accommodation destinations and so lacked choice. Even so, statutory regulations and the courts have attempted to ensure that applicants' position in the social structure does not disadvantage them in their encounters with housing professionals. This 'security', which is afforded by regulation and case law in relation to suitability of accommodation provided by LAs, was vital in the implementation process. Not only was it aimed at unifying practice nationally, it was also, paradoxically, an indication of the importance that policymakers accorded to

'protecting' the powerless and marginalised groups from the 'disadvantages of official discretion' (Watts, 2014:793). In other words, policymakers were aware of the potential of LAs, as implementation agencies, to wield coercive power on homeless applicants and so sought to curtail, through the Suitability Order, LA discretion in the fulfilment of their obligations towards the applicants.

Unsurprisingly, some research participants described the current homelessness law as not fit for purpose, a core reason why some of them in senior roles (e.g. assistant director, Lismore and operations manager in Hawkesbury) welcomed the discussions being held by London Councils to start lobbying for a change in the Homelessness Code of Guidance in areas such as 'suitability' and 'affordability'.

The assistant director in Lismore said,

> *"I think that you wouldn't find many London councils, at least, who would argue that you need to look at that legislation again in light of everything that's happened with welfare."*

However, as the research participants themselves acknowledged, any such changes will take time, a resource that the LAs did not have whilst they were struggling to fulfil existing duties. But even when/if any such proposals are considered by the government, the research participants envisaged that a consensus would be hard to reach, due to competing interests from the legal profession and advocacy groups (for example, Shelter) who may seek to scupper any plans to change the core homelessness criteria which may be detrimental to vulnerable groups (e.g. children).

7.1.3. Developing Creative Collaborations to Resist Monopolistic Networks

The research showed, in line with Berlin (1998 cited in Gais, 2000), that 'every solution to a social situation creates a new situation which breeds its own new needs and problems' (p.187). As a significant part of the accommodation provided by LAs come from private landlords, with whom LAs have collaborated for many years, the changes

in the regulatory environment (e.g. suitability of accommodation as ruled in *Nzolameso*) have served to increase the pressures on LAs to reconsider their procurement arrangements, especially with regard to the cost of accommodation. These developments altered the organisational positions of the LAs as they had previously competed for available accommodation across London.

The ongoing commodification of the housing market has reinforced the power imbalance between LAs and private landlords, the latter reportedly being better placed to dictate the terms of their relationship through asset ownership and price. That being the case, LAs came to realise that their financial stability may well depend on closer collaboration to put pressure on private landlords and force them to restructure their pricing structures and other contract issues. It was also regarded as a means of curtailing budgetary overruns.

The research participants reported that some 'loyal' private landlords were taking advantage of their virtually-monopolised positions and that the cost of the (mostly) substandard properties they had available was increasing exponentially. Yet, despite research participants' criticisms of private landlords' business model, they remained the main source of accommodation available to LAs' to fulfil their statutory obligations and so were deeply embedded in local governance networks. As a result, it would be difficult, indeed counter-productive, for LAs to disengage from them. Consequently, research participants in senior positions spoke of the urgent and ongoing need to collaborate and communicate effectively with other LAs with whom there was a "*catfight*" (housing options manager, Ryde) for the same scarce resource, affordable housing. This was largely the case up until the policy was enacted. Prior to the policy roll out, an effective bilateral or multilateral collaboration was not thought viable, given the different structures, varying levels of affluence and economic power, dissimilar local policies, administrative and organisational histories of the LAs. However, in the wake of

196

the policy, a multilateral, mutually-beneficial, yet voluntary, pact – the Inter-Borough Accommodation Agreement (IBAA) - was conceived and became operational.

The IBAA, brokered by London Councils, sought to determine and enforce the price at which bulk accommodation within London was procured, a move that was akin to *de facto* rent regulation. In this way, LAs appeared to be staging a fight back against "*greedy*" (operations manager, Hawkesbury) private landlords who hike their prices to take advantage of the housing crisis. However, I would argue that, rather than 'greed', private landlords were simply operating according to basic economic theory, that is, the principles of supply and demand and their cost implications.

Information gleaned from the interviews suggested that the IBAA agreement has been successful, in part, because of, a) the behavioural expectations set out in the agreements that required all LAs to respect the procurement terms negotiated by the LA where the property is located, meaning any LA that flouts these terms could be 'named and shamed'; b) the lobbying and/or mediating role of London Councils; and, c) the financial benefits that the LAs hoped to gain through such collaboration. This rational choice approach that had been adopted by LAs signifies the role of solidarity in shaping policy. In this approach, the LAs used their collective purchasing power to obtain value for money and to control price. Nevertheless, each organisation in this collaborative network was still a self-interested actor, not only because each LA would wish to maintain control over the resources within its jurisdiction, but also to acquire as many properties as possible for its own use. Thus, their motivation for collaboration may not be as altruistic as it may first seem. Indeed, the operations manager in Hawkesbury disclosed that Kensington and Chelsea Council had already declared their position on accommodation procurement which indicated that they were willing to break the IBAA code of conduct, even before it had had the chance to bed down:

"Kensington and Chelsea have come out and said publicly, 'If I need something, and it's in your area, I will break that agreement. If I NEED to have something" (Operations Manager, Hawkesbury).

Even so, the relational capital that the collaboration generated largely points to 'a multi-dimensional construct of policy implementation which included inter-organisational trust and joint commitment, intended to reduce the likelihood of opportunistic behaviours' (Newman, 2007: 9). In this sense, relational capital entailed an assurance that no signatory LA would exploit each other's vulnerabilities even if there was an opportunity to do so. This assurance, Kale *et al*, (2000) argued, arises out of the controls that relational capital engenders, which Kensington and Chelsea Council, apparently, did not wish to submit to.

In the remainder of this chapter, I analyse how the applicants were reported to be manoeuvring through and around the management of their conduct to maintain their housing entitlements or to register their dissatisfaction with the quality of accommodation that the LAs provided.

7.2. Housing Professionals' Narratives about Applicants' Perceptions and Reactions to the Policy Implementation

7.2.1. Resisting Activation

The applicants reportedly used various strategies to interact with the policy and demonstrate the cultural narratives that circulated (Watkins, 2006). As I have already mentioned elsewhere in this thesis, within the reality of the welfare state are welfare recipients' rights and entitlements. However, the relationship between the LA and applicant is 'grounded on an asymmetry' (de Leonardis 2010:126). The dynamic between the applicant (who is desperate as a result of homelessness and, despite his rights and entitlements, is weakened by socio-economic deprivation) and the LA official (who embodies the LA in both its specialised knowledge of the rules and organisational mandate) demonstrates this asymmetrical relationship.

Yet, the powerlessness of the applicants, as depicted in theory, should not be over-emphasised, for marginalised people often use identities of being owed a legal duty, both individually and collectively, to challenge normative assumptions and prescriptive values. Therefore, despite being treated like passive subjects, the applicants were reported to exert their autonomy and/or capabilities to have 'a voice with regard to the interventions that concerned them' (Kay, 2005:127) through subtle and overt technologies (e.g. resistance and abandonments) that are meant to reassert their autonomy, thereby subverting the power of the policy and housing professionals. Accordingly, research participants perceived the applicants' response to the policy as one of strategic manoeuvring and resistance to the "law say(s)" (Cowan, 2004: 932) and work-first narratives of the policy implementation.

All the participating LAs reportedly provided employment support to the applicants, even though this service was not a mandatory requirement of the policy implementation. The research participants in senior roles viewed this approach as vital in assisting applicants to comply with the policy and exempt them from the cap, which would, in turn, save the LAs money in accommodation costs in the long run. But this spend-to-save strategy, though incidental to policy implementation, could also be seen as a deliberate attempt by LAs to divert public responsibility back to central government by increasing benefits take-up and, by extension, the welfare benefits bill.

Still, some research participants attributed some of the applicants' failure to become 'active citizens' to their lack of social and human capital. As such, it was perceived that neither the presence of a dedicated welfare benefits officer, to persuade and assist the applicants to comply with the policy, nor the availability of jobs nor the (threat of) withdrawal of DHP awards for non-compliance, nor the social pressure or stigma of the policy rhetoric was sufficient to nudge some applicants into finding employment.

On the other hand, there were some applicants whom the research participants thought were capable of working but were unwilling to do so. These applicants' failure to become active was attributed to their legal consciousness (that is, their awareness of their right to housing assistance) and the 'moral hazard' that is intrinsic in the statutory homelessness framework, which generates 'perverse incentives' for those applicants (Fitzpatrick and Watts, 2010). In this regard, social housing applicants' resistance, in particular, was significant. As previously stated, apart from its impracticality, the absurdity of evicting applicants from social housing for rent arrears only for the same LA to house them again (because they have dependent children) in more expensive TA was not in keeping with the policy's behaviour change principles or, indeed, fair to taxpayers. For this reason, the research participants argued that some applicants were taking advantage of their status of 'priority need for housing' to resist the coercive power of the policy. It also suggested that the policy is meaningless to these applicants.

From such narratives, it was clear that the research participants blamed the applicants' resistance on the dependency and rights culture created by the Welfare State which, according to the housing options manager in Ryde, did not allow the "*umbilical cord*", to be severed to make people self-reliant and responsible. As such, the longstanding assurance that the safety net gives to applicants was, therefore, criticised by some research participants for undermining the 'stick' function of the policy.

Conversely, some research participants identified family-related and other individual encumbrances, for example, affordable and available child care, health problems, or low levels of educational attainment, as barriers to applicants' activation. However, the solutions to these barriers were not so readily available or may be culturally unacceptable for some applicants. For instance, the solutions to childcare-related problems may go beyond subsidised or free nursery places. Apart from the cost of topping up for nursery places, some applicants' willingness to leave their children to

strangers was also cited as a deterrence. As a result, some research participants viewed the policy as forcing applicants to go into work too early (when their children are still young) and so regarded it as harsh and not family-friendly.   Others, like the housing needs manager in Ryde, believed that the policy was unlikely to meet it objectives because "*the whole point of introducing the policy was ideological.*"

Apart from these socio-economic barriers, other resistance strategies were noted including applicants engaging in self-employment as a way to 'fulfil' the policy's work requirements. Even though self-employment is an accepted form of activation for the purposes of the cap exemption, the welfare benefits officers in the sample disclosed that applicants were not supported to develop a business plan, deal with taxes and file company accounts, marketing and business management skills and other aspects of running a business. This deficiency was reported to have created significant problems for some self-employed applicants as noted by the welfare benefit officer in Lismore, thus:

> *"I've seen another lady who is making a better go of it [self-employment] but can't cope with the paperwork. So, she's got Housing Benefit on her back to do self-employed income and expenditure…She didn't get to do it right…she basically wasn't apportioning the income that she was receiving into what she was spending on the business and what she was actually spending on herself. And she's also got £5,000 rent arrears. So, we're trying to prevent her from being evicted."*

This statement suggests that, even though the applicant was doing the right thing by the policy, she possessed very little business management skills, and in the welfare benefit officer's view, she was more deserving of his support and assistance than many other applicants who 'played' the system through being self-employed. Still, it could be argued that this applicant's naivete about business enterprise or ignorance of the rules regarding self-employment have combined to leave her in a very precarious housing situation. It also highlights that work does not always pay, even when the applicant was

working more than the minimum hours stipulated by the policy, and still had to rely on benefits for her housing costs.

Whilst the above applicant may be regarded as genuinely self-employed and was only struggling with the paperwork, others were reported to be engaged in 'pseudo-work' and were using self-employment as a loophole to play the system and become exempt from the cap. The HB manager in Ryde acknowledged that they lacked the resources to realise their hunches about fraudulent claims and so, "*short of physically following the applicants around to make sure they engage in work activities, there was little we could do to verify that they were engaged in 'gainful' employment.*" Consequently, distinguishing applicants who were work shirkers from those who were genuinely self-employed demanded research participants' careful judgement as, in Bevir's (2011) view, governance is more art than science.

In instances of alleged 'pseudo-work', self-employment becomes a 'concealment strategy' as it points to applicants' contestations of the policy (Watkins, 2006). That is, the calculated presentation of information regarding their employment status to the LA for benefit purposes but, crucially and purposefully, omitting or altering pertinent details such as the real nature of their 'work' (e.g. provision of genuine business accounts), so as to receive benefits to which they may not be legally entitled. But it could also be argued that some applicants had been forced to act dishonestly, even fraudulently, because they had no other reasonable alternative other than to hide information that could otherwise reduce their housing benefits entitlement. Nevertheless, it was unclear whether the applicants' reasons for resistance were purely economic or whether it bordered on the political.

7.2.2. Beggars Can't be Choosers – Applicants' Legal Resistance and Enforcement of Rights

There were little differences in the provision of accommodation amongst the LAs towards the applicants which suggested that the applicants were especially targeted for different treatments because of the reduction in their housing benefits. In this way, the LAs sought to have some impact on shaping applicants' behaviour through their mode of accommodation provision. This argument is in line with previous research (Lipsky, 1980; Brodkin, 2008), which showed discretion as organised practice, meaning that discretion reflects organisational characteristics.

Nevertheless, a few remarkable highlights emerged from such organised practices. For example, the operations manager in Hawkesbury and housing options manager in Ryde were especially blasé about moving the applicants out of London and thought that they could be '*shipped out*' and be '*unemployed elsewhere*' as if the applicants were 'unwanted cargo' or 'undesirables' that needed to be cleansed away from the midst of working people or the rich. On the other hand, others like the housing needs manager in Ryde, were quite applicant-focused and bemoaned the treatment of vulnerable and poor applicants whom he thought had no chance of escaping the centrally-determined, ideologically-driven policy which LAs had no discretion in implementing. For this research participant, rather than blaming the LAs for the quality of accommodation provided, it is the structural circumstances that the LAs operate within that determines service provision.

Yet stories emerged in the interviews of how applicants' legal consciousness was being expressed about the accommodation provided by the LAs. Despite the asymmetry in their officer/applicant relationship, the applicants were reported to increasingly use the choices available to them – voice (legal redress) and actions (abandonment) – to resist the administrative power of the housing professionals. Some applicants were

reported to have mounted formal challenges against the LAs, taking their grievances through the courts whilst others obtained much lower-level legal advocacy from Citizens' Advice or Shelter. This suggests that the law creates a counter-hierarchy of power by giving the applicants a 'right of action' against the LAs (Kenna, 2005 cited in Fitzpatrick and Watts, 2010). In other words, whilst the policy removed applicants' social citizenship, the homelessness law reasserted it. The power struggle that thus ensues between the LA and the applicant signifies a kind of resistance which is 'formed right at the point where relations of power are exercised' (Cowan, 2004: 931). Nevertheless, the majority of applicants may have limited ability to assert or realise their rights to housing, given the adversarial legal system in England, where the burden of responsibility for seeking redress rests with the applicant. Therefore, those applicants may be unlikely to pursue legal redress due to their lower socio-economic positions in society (Fitzpatrick and Watts, 2010). This thus gives the LAs advantage over the applicants as they capitalise on the likelihood of non-action by some of the applicants.

Thus, the LAs' choice calculus (Brodkin, 2011) on applicants not enforcing their legal rights facilitated their removal to areas where accommodation was cheaper, even though the *Nzolameso* ruling, mentioned earlier, signalled a change in direction. But one could also argue, in defence of LAs, that they were acting on the messages, albeit mixed, that the government was sending out in the policy narratives. In response to some of the criticisms of the policy in the media, the government had argued that there were large volumes of properties elsewhere in the country, below the benefit cap thresholds, available to the applicants and their families (Hackney Council, 2012). This argument may reflect the reality that, in hot markets like London and the south east of England, where demand exceeds supply, the available accommodation can only be accessed by those willing and able to pay the going rate, thereby linking the gentrification thesis to this research.

Meanwhile, applicants were reportedly being sensitised to expect an out-of-district accommodation offer just in case an alternative within the district was unavailable when they needed it. This circulating cultural narrative helped to reduce the pressures on LAs and meant that few of the applicants resisted within-London placements as they themselves were believed to have made fruitless efforts to secure local accommodation. In the quotes below, the research participants appeared to be understanding of applicants housing preferences and suggest that the pull factors of London were preventing the applicants from seeking better quality housing elsewhere:

> *"So, most of the support offered is in terms of employment because our experience of most of the capped households is that they don't wish to move out of borough to an area where housing costs might be cheaper. They would rather stay and either try to find work or possibly move to smaller accommodation within the borough, but there's very little appetite to move out of London and out of borough" (Housing Needs Manager, Ryde).*

> *"People in London don't seem to go anywhere. And actually, people that have migrated here don't want to leave either. (Laughter). So, you know it's a huge problem" (Operations Manager, Hawkesbury)*

> *"You know the problem with us is families unwilling to move outside London and to resettle there. Even though the housing situation is much better there, we haven't been able to force families to go outside London" (Welfare Benefits Officer, Ryde).*

Therefore, the attachment to place was a significant factor for the applicants.

Whilst the research participants, quoted above, bemoaned the applicants' intransigence to take advantage of the accommodation opportunities that may be available to them elsewhere, those quoted below were more hard-line and paternalistic in how they believed accommodation should be provided by the LA. In their view, the suitability assessments carried out by housing professionals should not be challenged, as the quotes below suggest:

> *"And I think that's the overarching thing…you come to us in a time of need, us, a local authority, have to give you all the assistance we have within our remit. If what we're offering you is a private sector offer of accommodation and you're refusing a suitable offer of accommodation, then we shouldn't offer you anything else. And if what we have*

available to you, and affordable to you, is outside of London, that's all we can offer you" (Accommodation Manager, Lismore).

"And we're dealing with people who are coming to the council and we are basically providing them with housing. You know, like, 'Here. This is the address: move in.' And so, we consider we're providing something that is an incredibly valuable service. But of course, inevitably, people won't necessarily be happy with what it is that we're offering. Whether that's in terms of location, size, the physical condition of the property… you know" (TA Procurement Manager, Lismore).

These quotes hark back to Marcuse's (1989) scholarship on oppression in housing and depict an exclusionary practice of unilateral decision-making that seeks to further the policy's paternalistic agenda. This finding mirrored Cowan's (2004) study on LAs' service provision to homeless applicants, in which he argued that the participating organisations pursued a 'one offer only' policy of 'suitable' accommodation which meant that if an applicant rejected the offer the LA would terminate its housing obligations towards the applicant.

The coercive undertones that were embedded in the above research participants' notional offer of accommodation supports the argument that 'beggars can't be choosers.' Therefore, in these research participants' views, applicants who refused accommodation provided to them when they were in need should be regarded as 'undeserving' (or, indeed, not homeless) because they were not grateful for the offer of a 'roof over their heads' which, admittedly, is the only legal duty that the LAs owe to homeless applicants. Nevertheless, the research participants' apparent subjective judgement of applicants' 'undeservingness' and 'ungratefulness' connotes that _they_ were doing the applicants a favour by providing them with accommodation rather than them acknowledging that they were _doing_ their jobs as public servants. Having a 'take it or leave it' attitude towards the applicants also implied that applicants had no right to enforce their legal rights or to have any standards of home decency because they were poor. Thus, in their minds, research participants' own normative assumptions, attitudes,

and prejudices can also affect their interactions with the applicants in subtle and not-so-subtle ways (Haney 1996 cited in Watkins, 2006).

Another reading of the above quotes points to the stress and pressures that research participants faced in their work and a 'one and only offer' is their way of coping with those work pressures. It could also stop applicants from cherry-picking and hence prevent them from making officials' jobs even more stressful. This form of 'self-preservation' (Dwyer, 2002) may lead to the conclusion that the research participants were not empathetic towards the applicants, which may indeed be the case, but the policy narratives have themselves ensured that the applicants' citizenship rights are severely curtailed which means they do not have autonomy to decide on their housing destinations.

This analysis does not mean that the whole organisation of Lismore shared the views of just two of its managers. Rather, as 'situated agents' (Bevir and Rhodes, 2006), the research participants' views may be shaped by their own subjective concerns and meanings, values, preferences and interpretations of the world which they brought to bear when determining accommodation allocation decisions. This creates challenges for their senior management team and local politicians who were responsible for consistent and equitable policy implementation (Keiser, 2010).

The quotes cited above also revealed that the applicants' attachment to place, as a result of their social relationships, were not taken into account when an offer of accommodation was made due to accommodation shortages. As a result, it was further reported that applicants reacted negatively to the coercive power and unilateral decision-making of the LAs by abandoning unsuitable, out-of-district accommodation placements. This finding was revealed in the interviews with two research participants, one of whom was quoted above for his paternalistic opinions about LA housing allocation:

"What we find though is that..., on occasion, people don't live in the temporary accommodation that we're providing because they think it's too far away" (TA Procurement Manager, Lismore).

"Families that go and six weeks later providers are saying, actually they've gone, it's vacant, and those households are just disappearing into the ether again" (TA Procurement Manager, Ryde).

Apart from the waste of limited LA resources, there is also a wider issue of need with these occurrences which begs the question as to whether such applicants were genuinely homeless in the first place. Or whether, in their desperation to remain within their districts of residence, the applicants were moving their families to wholly unsuitable accommodation with its attendant risks, for example, child welfare and other health and safety concerns.

One other explanation for accommodation abandonments may be the applicants' 'defensive and feverish desire to guard their dignity against the system because they may have been too discouraged, angry, ashamed, or exhausted' (Watkins, 2006:24) with the LA bureaucracy. Thus, in abandoning the accommodation provided to them, these applicants may be resisting the goals and tools that had been put in place to discipline them. Central to this contestation is the LAs' organisational practices and the cultural norms that were embedded within the welfare reform narratives. Thus, Watkins (2006), in her study of the welfare reforms in USA, conceived of such applicants' resistance tactics as a form of 'self-management that engages with the dominant prescribed regime of governance by creating [...] techniques that seek to challenge and undermine what they deem systematically oppressive practices of power' (p.33).

Another major finding was that applicants' locational preferences were a function of the quality of local schools. This means that the applicants' place attachment was broadly characterised by strong "elective belonging" in straitened times (Paton, 2013). But it could also be argued that applicants' economic constraints did not mean that they

abandoned their aspirations for their children. Research participants acknowledged that the quality of schools, especially in Hawkesbury and Ryde, were pull factors for residents:

> *"This borough has a very good education system. Lots of families move, or used to move, to this area for education. They don't want to leave, you know, because they think the schools are great" (Operations Manager, Hawkesbury).*

> *"But you know, the other thing that we have is schooling is very good in this borough. People often don't want to move their children out of a good school" (HB Manager, Ryde).*

Given this strong attachment to place and fondness of area, some applicants were reported to find ways of returning to their local districts after abandoning the out-of-district accommodation provided to them by the LA. Thus, by their actions, the applicants were signalling that the LAs were incapable of furthering their and their children's best interests, especially with regard to their children's good attendance at school or maintaining their social ties.

Using a distinct body of knowledge that defines home and social ties, this finding could be interpreted in relation to social norms. The situation in contemporary London has changed the meaning of home from a place where work and living are interconnected to a symbol of relative affluence that helps define one's position in society (Hill, 1991:307). Consequently, the degree to which an individual has control over their location of residence is a valuable one and an indicator of self-governance. This means that applicants' 'place attachment has become an important class signifier' because an individual's living arrangements 'acts as a useful domain in which to view class formations in action' (Paton, 2013:85). So, just as research participants' out-of-district placement decisions served to reinforce and displace applicants from their local areas (*ergo*, social cleansing), so too was gentrification which leads to displacement and socio-spatial segregation. Indeed, rather than alleviating the social segregation of the applicants, the policy ensures that they, and others like them, are steadily priced out of gentrified areas (Lees, 2008; Marcuse, 1989).

However, other research participants attributed the draconian practices of out-of-district placements to the austerity of the policy and the cost of housing. The accommodation manager in Lismore, in vacillating between support and criticism of the policy and its ideologies stated that, although it was "*good to get people into the scheme of working and knowing the value and benefits of working*", he did not believe that the policy should "*push people to a stage where it's unaffordable for them to live anywhere remotely close to where they used to*". This critical language positions the applicants as victims of a harsh welfare regime that sought to systematically displace them from their areas of residence. It shows that some research participants resisted the overwhelmingly negative perspective of poor people's affiliation to place that is congruent with the disciplinary aspects of the policy.

In line with Lees (2008) and Marcuse's (1989) thinking, the housing options manager in Ryde too remarked that the phenomenon unfolding was one of gentrification because "*London is becoming a metropolis*" and only those who could contribute to the capitalist economy could stay. Gentrification, in this context, is understood as social and economic change that produces urban space for progressively more affluent users (Hackworth, 2002 cited in Clark *et al*, 2013). Accordingly, as the applicants' ability to meet their housing costs had been severely constrained by the policy, they become bereft of choice and control. The phenomenon leaves applicants in a very precarious state as it gives them limited housing options. In this context, the reproduction of inequalities that the meaning of place conjures up for the applicants reinforces their identity as welfare dependents, given that their housing destinations may not provide the opportunities for restructuring their relationships (or that of their children) with the state.

7.3. Discussion and Summary

The themes of criticism and resistance capture the dynamics of the implementation process by revealing some of the competing values and practices that co-existed within the LAs. The themes show how differing interpretations of central government policy inform an uneven and divided local provision. Interpretations of a standardised policy statement at the local level thus sheds light on the tensions that arise when resources are scarce, but mandates are onerous. These tensions, therefore, reflect both the inherent contradiction between an ambiguous policy and the need to secure suitable accommodation for the applicants 'within neoliberal governance' (Nethercote, 2014). It also reflects the recognised tensions between applicant willingness to comply and their legal consciousness of being owed a statutory housing duty.

The interpretive approach adopted in this analysis reveals the diverse traditions and narratives that inspired housing professionals and the LAs in the provision of homelessness services. Yet, even though they were at the mercy of the housing professionals, the applicants were, reportedly, able to find ways to resist or thwart research participants' actions and agendas. Research participants' narratives reflected applicants' diverse responses to perceived oppressive situations, such as subtle, seeming compliance in the form of self-employment or bolder acts of resistance such as abandonment of accommodation. Abandonment in this sense of resistance is the applicants' way of formally withdrawing their homeless application and the housing duties, previously accepted by the LA, would, therefore, be discharged towards the applicants. These are strong instances of ineffective policy implementation as they depict that the impact of dominant political constructions of the applicants cannot 'simply be read off texts, especially as policy is rarely transferred in a straightforward manner' (Brooks, 2013: 329).

Still, other modes of policy implementation were aimed at getting the applicants to act in their own best interests. Empowering applicants through providing work leads, training opportunities or encouraging them to move to smaller or cheaper accommodation were all meant to create a power dynamic that was both regulatory and liberatory, depending on the applicants' motivation or willingness levels, especially as research participants could only 'encourage', not coerce them. Such technologies of governance fluctuated between subjectivity and subjection, meaning that, in empowering the applicants, the research participants were also engaged in transforming applicants' political subjectivity into an instrument of government (McKee, 2015).

Correspondingly, the applicants' modes of resistance justified research participants' surveillance approach since the applicants could not be trusted to behave in moral and responsible ways. As such, applicants' tactics, whether through enforcement of rights or concealment of information, "might be better thought of as a form of "bounded resistance"'" (Watkins, 2006:42) which emerges out of the implementation process. This kind of postmodern approach to resistance has, however, been criticised by researchers (e.g. Handler, 1992; Jurik, Cavender, and Cowgill, 2009) for its individualism which only symbolically challenges dominant conceptions but fail to promote increased solidarity, organised politics, or material outcomes. But one could argue that the *Nzolameso* case, a seemingly individualised act of resistance, became associated with collective awareness that was linked to broader political critiques of dominant structures to promote change (Gilliom, 2005; Jurik *et al*, 2009). This case law thus gives a structuralist perspective to resistance as it mobilised for procedural change.

Yet, enforceable legal rights have the potential to be both inefficient and unnecessary, where homelessness prevention can be just as, if not even more, effective in terms of housing assistance. This arrangement has proved successful in Ireland where, instead of a legal rights-based approach to housing assistance, 'a problem-solving one

was adopted which appeared to have worked reasonably well in reducing levels of homelessness' (O'Sullivan, 2008:229). Legalistic approaches, as in the English case, thus discourages a low-key, incremental style and instead adopts an adversarial stance which 'directs power and resources into the hands of the legal profession and away from local service provision' (De Wispelaere and Walsh, 2007 cited in Fitzpatrick and Watts, 2010:116).

Moreover, although the decentralisation of the policy has, theoretically, allowed LAs greater discretion for local policy formulation, in practice it has resulted in greater risks and responsibilities for the LAs, which has left them little choice but to impose market rule as the solution to implementation problems (DeVerteuil, 2006). Under this economic logic, accommodation is sought wherever reasonably practicable and the applicants face being displaced from the 'urban metropolis'. The reality of resource shortages has also limited LAs' abilities to solve the applicants' homeless problems, and the accommodation assistance provided only "'mop[s] up' the most glaring consequences of poverty and … cushion[s] its social and spatial impact" (Wacquant, 1999: 1642). In effect, LAs played a managerial role in a well-entrenched housing crisis.

In essence, the provisions of the homelessness law with regard to vulnerability and housing safety net show how the policy, not applicants' motives or resourcefulness, has failed the LAs. From this knowledge, it is easy to see why LAs manoeuvre (as in resist) the law to control their operational budgets.

In the next chapter, I analyse how the research participants came to see their own identities within the implementation infrastructure.

Chapter 8 – Emotional Labour and Professional Identity Transformations

8. Introduction

In this chapter, I analyse the entanglements of emotions that emerged from the interviews. The research found that the housing professionals constructed their narratives through their work roles and personal values, which suggests that their professional identities had become entangled with their views of the self. Moreover, through identity talk, research participants "undertake and make sense of their work, whether protecting or attempting to disrupt the power dynamic" (Jones, 2013:19) that was inherent in the implementation landscape.

For the purposes of this analysis, 'identity talk' (Snow and Anderson 1987) represents the narratives through which the research participants formed/conveyed their professional identities, particularly their roles within the organisations and their interactions with the applicants. Identity work encompasses "the range of activities individuals engage in to create, present, and sustain [professional] identities that are congruent with and supportive of the self-concept" (Snow and Anderson, 1987:1348). Identities were themselves enacted through verbal constructions of the self.

Research participants discussed and commented on the strategies they developed to cope with work pressures, and their feelings, values and behaviour which demonstrated their emotion work alongside the crisis that had developed in their professional identities. This concept of emotion work was borrowed from Hochschild's (1983), *Managed Heart,* in which she argued that, as well as physical labour, work also constitutes emotional labour which is both the inner, invisible processes of engagement and the management of those feelings.

Role-based professional identities illuminated the complex ways in which research participants saw themselves, or the persona they adopted, in their roles or the complex ways in which they differentiated between the individual and society (Hochschild, 1983). These influences represented significant conditions that affected research participants' behaviour and values that varied according to their job roles. Besides, these factors had distinct effects on the dynamics of organisation-officer-applicant interaction. This dynamic, thus, provides a lens through which one can evaluate the organisational conditions that mediated central government policy goals, local interpretation of the policy and frontline behaviour towards the applicants.

Whilst there were regularities and divergences that emerged from the interviews, which I attributed to research participants' locality and designation, they still combined to emphasise the dynamic character of the social world and suggest that identity is not static but is context-sensitive and presents an evolving set of constructions (Alvesson *et al*, 2008). From this standpoint, professional identities become important resources in the formation of self-identity and 'othering', that is, 'that against which one defines oneself' (Cole, 2004: 578), which I would suggest is a kind of 'distantiation' in social relationships. Identities, in this analysis, are thus constructed through difference and 'in relation to the Other, to what it is not, or to precisely what it lacks…' (Hall, 2000:17). But for professional identity theorists, like Burke and Stets (2009), 'identity is the set of meanings that describe who one is when one is an occupant of a particular role in society, a member of a particular group, or identifies with particular unique characteristics' (p.3). The fluidity of identities, therefore, allowed research participants to occupy a multiplicity of roles in their interactions with the applicants.

8.1. "We're Firefighting": Professional Identities in Flux

The interview data revealed the collective identity and the perceived relationships that research participants thought they had with the applicants. This, in turn, was influenced by their professional views of themselves. The interview data also provided an understanding of the emotional subtexts behind the policy implementation with its focus on changing applicants' behaviour which revealed individual research participants' feelings about work pressures. These emotional subtexts of the policy are thus closely linked to issues of identities (Tonkens, Grootegoed and Duyvendak, 2013).

The interview data presented two types of research participants that were distinguished by their proximity to the applicants: 'social worker' and 'efficiency strategist'. In identifying the research participants' professional identities, Taylor, Gross and Towne-Roese's (2016) typology of caseworker identity and casework management were modified for this analysis.

Taylor *et al's* (2016) model of 'social work' identity emphasised the helpful resources that caseworkers provided to customers to mitigate the structural barriers and challenges they faced in complying with the policy whilst the 'efficiency engineer' identity focused on customers' deficiencies and the steps taken 'to increase work participation rates, preventing fraud and ending dependency' (p. 1130). I adopted and adapted Taylor *et al's* typology to present 'social workers' as the frontline, street level research participants who, as well as providing helpful resources (as per Taylor *et al's* depiction), also performed the role of 'efficiency engineer'. The development of the 'efficiency strategist' typology in this analysis emphasised the strategic focus of research participants in senior management roles in ensuring the implementation of the policy at the street level and the development of policies to facilitate implementation.

In this study's model, the welfare benefits officers, accommodation manager, housing options officers and managers acted in social work capacities as they ensured

that the applicants could sustain their tenancy, encouraged them to get a job, provided help or sign-postings to stakeholders who can develop their jobseeking skills, made referrals to other family support (e.g. social services, tenancy support), reported child abuse or neglect, and arranged for TA and/or the storage of applicants' belongings in the case of homelessness etc. Their roles also included case work and follow up on advice outcomes. The 'social worker' thus had a strong relational interface with the applicants which is engendered by them having almost daily contact with the applicants at the street level (Casey, 2008: 768).

The remaining research participants – assistant director and housing needs managers, operations manager, housing benefit managers, TA procurement managers and senior income manager - were mostly the efficiency strategists who supported the rendering of frontline services and so did not interact with the applicants. Instead, they steered practices from the back office and ensured budgetary controls.

The findings suggest that some of the 'social work' participants had constrained discretion within the implementation structure which also impacted their individual characteristics, such as their adherence to policy and organisational goals, attitudes toward the applicants and colleagues, and decision-making rationalities. Their experiences were made even more restricted by the performance management culture that has been embedded in public sector administration which emphasise 'doing more with less.' This culture has also caused the research participants 'to adopt opportunistic, fire-fighting, reactive strategies' (Robinson, 2006:64) to fulfil service requirements. Such enforced strategies tend to inhibit the development of a long-term vision that is conducive to improved service delivery. Moreover, as 'social workers', research participants needed to always be ready (firefighter) to solve presenting applicants' housing problems or provide them with an advisory service. Besides, due to dwindling

organisational resources, these research participants adopted a rationing or prudential stance, to ensure that all presenting applicants were given some assistance.

For their part, the 'efficiency strategists' made strategic judgements on overall service provision, as these quotes testify:

> *"We're fighting fire. And, we're supposed to be contributing to strategy and policy and we're so jaded by the day-to-day stuff that goes on, you know… I think we've worked it out that to keep someone in B&B [temporary accommodation] for a year is about £10,000. So, if we're going to spend money to keep people out, I've always got that figure in my head" (Operations Manager, Hawkesbury).*

> *"All placements…all temporary accommodation costs us about £8,000 [a year], so you're looking at it costing £8,000 for somebody on benefits and £13,000 to somebody who's affected by the benefit cap" (TA Procurement Manager, Lismore).*

These research participants' statements suggest that the policy implementation has been redefined in more narrow terms, that is, TA provision or homelessness prevention. But TA is more expensive for LAs than social housing and private rented tenancies which is why there is an emphasis on homelessness prevention. Policymakers, on the other hand, had made unrealistic suggestions to tackle the fall out of the policy, incuding persuading the applicants' landlords to reduce their rent in line with the cap; moving to cheaper accommodation; reducing the households' expenditure on non-housing items, and; in the case of lone parents, seeking child maintenance from the absent parent. This finding reveals that the policy was not being implemented, as intended. LAs found themselves merely managing the homelessness crisis that it generated.

8.2. Emotional Labour

The interview data further revealed that emotion management was evident among the research participants, especially in regard to how they felt about the policy's interface with the homelessness law and its impact on the LA. Yet, to manage these

feeling rules, or emotional labour, Hochschild (1983) argued that actors need to develop agency to shape their emotions.

In her seminal writings on the sociology of emotions, Hochschild (1979) defined 'emotion work', broadly, as "the act of evoking or shaping, as well as suppressing, feeling in oneself" (p.561). She also made a distinction between emotion 'control' and 'suppression', the former being 'a mere effort to stifle or prevent feeling', and the latter 'a cognitive emotion work in which an undesired feeling was initially present'.

One aspect that characterised research participants' work was the dual values of empathy and power (Hochschild, 1979), but the latter was tempered, in part, by the recognition that the applicants have a priority need status and a 'respect' for that statutory identity. But as every account and interaction manifested an underlying negotiation of identities (Seale, Buck and Parrotta, 2012), the research participants gave various explanations for the decisions they made, especially the participant HB managers who rationalised how the DHP fund was administered:

> *"Where people simply can't afford their rent, then the DHP is what we'll turn to… If a small amount of DHP here is going to save a large amount of temporary accommodation costs there, it's not difficult to do the math and apply the DHP appropriately" (HB Manager, Lismore).*

> *"What we tend to do is, if someone's actually registered to move and hasn't been offered anything, we help them with DHP, we support them until they can actually move" (HB Manager, Ryde).*

In these explanations, research participants portrayed social patterns of emotive experience as they revealed notions of 'doing their best to support the applicants'. Though the accuracy of their portrayals could not be verified, due to the method of data collection, the research participants still made sense of their roles by engaging in emotion work involving cost-benefit analyses to manage the (potential) homelessness crisis that the policy could create for LAs.

Furthermore, the empirical evidence confirms that the policy is a source of pressure for research participants and entailed significant emotional costs and labour to cope with its impact. For example, the operations manager in Hawkesbury characterised her emotion work by using an active verb form – "*I have to suppress my own feelings*" – which connotes that, despite her feelings of financial injustice towards the organisation, she had no alternative but to follow the policy implementation agenda. The prospect of 'unfair' financial burden on the organisation then became a resigned affair.

The scale of the (potential) organisational impact appeared to have triggered her emotions but she stifled the feeling rules, that is, what she should feel, (e.g. anger at the extra pressures the policy implementation put on her daily work) only to develop other adaptive mechanisms, akin to self-preservation. For example, the research participant passively acquiesced to the implementation rules thus: '*I don't have any personal feelings about it to express. I'm just following the job I need to do. I have to suppress my own feelings because I've got a job to do, basically*'.

This mental work compartmentalisation and her neutral stance masked her actual feelings, meaning that she did not think that the circumstances warranted *that much* feeling of *that sort* after comparing the situation with the values and expectations of her role (Hochschild, 1979:559). Yet, her practice of reflection may not free her from the need to worry about the applicants' rights and the mechanisms for her professional accountability (Schön, 1983). Thus, to avoid affective deviance, she consciously worked on her feelings and developed a neutral attitude to avoid problems with her bosses and ensure that she kept her job. Still, despite her apparent *negative* attitude, the research participant had to invest a considerable amount of her identity in being able to do that job well (Casey, 2008:768). As a result, her statement suggests that she consciously and voluntarily managed her emotions to separate her politics from her practice. Hochschild (1979) referred to this cognitive form of emotion management as 'deep acting'. In deep

acting, 'a feeling or emotional response is self-induced, and the feeling provides the basis of "acting" or impression management' (Hochschild, 2003:35). Thus, through her experience, the research participant deliberately made efforts to prevent any feelings of anger or bitterness that would impact on her work.

This research participant's narratives, which were not unique among the sample, also reveals the normative social order from an emotion management viewpoint. From this perspective, feeling rules seemed to govern how the research participant tried (or not) to feel in ways "appropriate to the situation" (Hochschild, 1979:552). Such perception suggests that the participant is deeply social and socialised as she tried to fulfil the policy requirements, with no less than her feelings. Thus, the research participant not only conformed to the policy requirements outwardly, an attitude that Bolton and Boyd (2003 cited in Tonkens *et al*, 2013) referred to as 'presentational emotional labour', or routine compliance with feeling rules, but inwardly too, even if reluctantly, by managing her feelings 'appropriately" (p.410).

This finding further revealed that this research participant's narratives and her conscious decision to be a mere policy implementer of top-down policy give credence to Lipsky's (1980) characterisation of a 'manager'. In this research, managers were the mediators between senior management and frontline officers and they interpreted top level strategies (even if they do not agree with them) into frontline practices. Nevertheless, frontline colleagues could still see them as being in cahoots with senior management which could affect their relationships.

Emotional labour was also found in the narratives of the mid-level research participants in their interactions with the applicants. The housing options manager in Ryde appeared sympathetic of applicants' plight and bemoaned the difficult situations that had befallen them: "*So you do feel sad for them, …, young woman, single parent with a child, two bedrooms, wanting to find a property like 1300 pounds, couldn't afford it, she*

221

couldn't." This participant's service-oriented attitude and sensitivity to the needs of some of the applicants presented him with a conflicted conscience in situations where enforcing rules and practices implied negative outcomes for the applicants (Tonkens *et al*, 2013). Although the research participants did not give in to the applicants to maintain his role as a professional, he still conveyed a 'feeling of warmth and sympathy as a 'sweetener'' (Schön, 1983).

Moreover, despite the tense and adversarial dynamic of the policy's implementation that sometimes occurred at the street level (Watkins, 2006), the housing options officer in Hawkesbury remained empathetic towards the applicants:

> *"But generally, I find that most clients take on board what you say. I think also it's the way you handle it: I encourage them to ask questions… I always say at the end, 'Is there anything else you want to talk about, any other questions?' and stuff like that. Because I feel if there's something on their mind that you don't know about, that could make things a bit difficult going forward… I guess there's only so much you can do, but I think you try to build a relationship with them. Because often (laughs) you're telling them things that they don't want to hear, and maybe it's the way you put it across and stuff like that. But on the other hand, if you're telling them exactly where they are and what the situation is they know where they stand."*

This research participant's 'espoused theory' (Argyris and Schön, 1974), that is, the words he used to convey what he did, or what he would like others to think he did, suggested that his interactions with applicants demonstrated his professional skills, couched in emotional labour, that is, being supportive and patient with even the most potentially reserved or abrasive of applicants. His 'interactive account of emotion' highlights how some research participants consciously feel and portray their feelings towards rules and social structure (Hochschild, 1979:560).

Besides, the frontline role of this research participant required the establishment of a relationship with the applicants, however fleeting, that involved an encounter, dialogue and co-production. Of the three elements of a relationship encounter, co-production has the most significance as it can be both therapeutic and diagnostic

(Needham, 2008 cited in Somerville, 2015). As a therapy, co-production builds trust and communication between the research participant and the applicants by allowing both sides to explain, respond and listen to each other. In diagnostic mode, co-production reveals the applicants' hidden needs by identifying the main causes of their failure to comply with the policy requirements and negotiating effective means to do so. Diagnostic mode also allows the applicant to seek answers to issues they were unsure of.

In this research participant's narrative, the 'social work' typology was central to his identity and he saw it as his personal project to ensure that all applicants in his caseload were armed with all the information they needed to make decisions about their families' welfare needs. The research participant made sure that the applicants' situations were familiar to him and his experiences, or repertoires, functioned as 'precedents or templates for his interactions with future applicants' (Schön 1983: 138).

What is more, the research participant's choice of language – "*I think also it's the way you handle it*" – suggested that other officers did not invest time or displayed the same 'patience and empathy' required to ensure that the applicants understood the implications of the policy for their families. Therefore, applicants' experiences and/or the resultant variation in service delivery and support suggest outcomes may be affected, in part, by an individual applicant's interaction with their housing caseworker.

8.3. Identities in Crisis

The interview data revealed that all research participants had similar, yet contradictory, perspectives on the policy design and rationales, implementation requirements and/or the applicants. One of the oft-used words in the interviews was 'hard' (meaning *struggle*) which was in relation to the (local) housing shortages. However, rather than using the binaries of 'inner' and 'outer' London areas to differentiate their circumstances, research participants invoked the leitmotif of 'being in the same boat' to

infer that the policy implementation was a 'struggle' as cheaper accommodation to match applicants' reduced income was unavailable for them to move into. In their responses and as previously indicated, the participating managers reported that the LAs recognised the importance of having solidarity in relation to accommodation procurement to mitigate the escalating costs that threatened to undermine the viability of LA services provision:

> *"So, London Councils already have a well-established cap on rates for nightly-booked accommodation so we're already in that, doing that. And they're worked out on a kind of regional basis according to rents, things like that." (Assistant Director, Housing Needs, Lismore)*

> *"Across London we've got an inter-borough agreement, all boroughs, and each borough has looked at its payment for B&B, [temporary accommodation] … all the incentives that we give and everything, and we've just laid it all out." (Operations Manager, Hawkesbury).*

> *"There's been a pan-London agreement on prices… And that has been very successful in driving down the costs of… our overall cost on nightly-rate accommodation has gone down 9% over the last year" (TA Procurement Manager, Lismore).*

> *"Further, what we have stipulated is that the inter-borough accommodation agreement is key, and we've brought that forward to say that this is what we are abiding by, and we've had a refresh on that" (TA Procurement Manager, Ryde).*

This recognition of their shared identity – a shift from the corrosive "us-against-them" thinking (Gilbert *et al*, 2015) that prevailed before the policy roll-out - highlights the importance of collaboration and a model of identity that portrays a unified voice in the governance of accommodation procurement. But, as already stated, this collaboration can only be realised, regardless of organisational need, if there is trust between signatories and each LA recognising and upholding the tenets of the IBAA.

Before the agreement was put in place, one of the main problems reported by the research participants in Hawkesbury and Ryde was that richer, inner London LAs regularly out-bade or provided extra emoluments that incentivised the local private landlords to let their properties to them rather than to their local rivals. Paradoxically,

though, the new collaboration between LAs had produced another form of "us-against-them" identity which is now directed towards the owners of private accommodation and the hope was that the LAs, with their vast bargaining power, would hold sway over the private landlords.

Another type of identity talk that the interview data revealed was 'identity work', which Alvesson, *et al* (2008) described as 'the ongoing mental activity that an individual undertakes in constructing an understanding of self that is coherent, distinct and positively valued' (p.15). This analysis emerged from research participants' constructions of their relationships with applicants which then raised questions about their professional identities. In attempting to rationalise their roles, the research participants crafted self-narratives that drew on cultural resources and memories to construct their sense of self (Munger, 2006). Such narratives, according to Munger (2006), are 'a critical step in identity formation as they explain relationship constructions in regard to an individual's position' (p.414).

In particular, some research participants engaged in identity talk when their routinised production of a self-identity within their role was discontinued by the policy implementation which then triggered uncertainty, anxiety, questioning or self-doubt (Collinson, 2003 cited in Alvesson *et al*, 2008). Below are quotes from these research participants' interviews in which they suggested that the job titles of their roles did not convey what their jobs actually entailed. Their discourses thus pointed to "identities in crisis" (Howard, 2000), in that, they portrayed instances of changing expectations for their roles that have challenged or threatened their normative identities. This view suggests that some research participants felt they were being over-stretched within their working relationships and they had become a

> *"...kind of all-singing, all-dancing, looking at all these different…there's had to be a lot more involvement in housing in those areas...care needs, links to the community, employment opportunities, education. So, there's had to be a lot more involvement in*

housing in those areas than was the case before" (Assistant Director, Housing Needs, Lismore).

The operations manager in Hawkesbury buttressed this view with similar sentiments thus:

"So, ... we're now referring people for work, we're doing debt counselling. Now pointing out the obvious like parents to most of the households come through our door. We're having to relocate them, ... to resettle them, all of these things that years ago, who did all that for people? I don't know, it wasn't housing officers. I know that much."

In other words, the research participants believed their roles had transformed into complex multi-dimensional, all-encompassing functions, which were seen as more wide-ranging in terms of skills and of goals and values, as opposed to their normative and expected identities (Evans, 2010). This sense of loss, or reminder of halcyon days, seemed to frustrate the operations manager in Hawkesbury, as gone were the days when frontline research participants performed the much narrower role of assessing homeless applications, securing suitable and affordable accommodation for applicants or advising them how to do so. This finding further suggests that, rather than helping applicants to feel recognised in their needs (Tonkens *et al*, 2013), the present system had robbed applicants of their sense of personal responsibility which is at odds with the policy rationale and which, paradoxically, reinforces welfare dependency and passivity. As such, the change in individual behaviour and cultural expectations may fail to materialise, that is, "the shifts in who people think they are, how they should relate to each other, what they can legitimately expect from the state, and what the state can legitimately expect from them in return" (Newman 2006:4) have not happened.

8.3.1. Frustrated Intermediary

Frontline research participants constructed identities of frustrated intermediaries as they were implicated in the disagreement about employability between central government and the applicants. The quotes below are representative of research participants views in all three LAs:

> *"It's fair to say a lot of the clients don't want the bother of getting into work anyway"* (Operations Manager, Hawkesbury).

> *"But the third thing is just an unwillingness to go to work that we've found among some of the people affected and almost a belief that we won't evict them and that the DHP is going to be there forever. For those people, the hard-core people ... [they] don't want to work, not interested in work, they'll just assume DHP will cover [their rent]"* (Senior Income Manager, Lismore).

> *"I think we've had some who've made excuses not to work, but I also think there's some who've been out of work so long they're probably quite fearful of what to expect if they go back to work. I think there's some people that don't want to work"* (Housing Options Officer, Hawkesbury).

> *"I mean you'll always have the small cohort of people who just don't want to work and won't work"* (HB Manager, Ryde).

These research participants appeared resigned to the fact that they were powerless in regard to facilitating applicants' behaviour change to fulfil the policy requirements. Although not explicitly stated, the research participants also implied that there were some applicants who were lazy and did not want to bother with work. What is more, their laziness and unwillingness to comply with the work requirements of the policy was because of their culture of dependency and deep-rooted sense of entitlement. These beliefs are in line with the policy narratives and its conditionality focus. Another more profound reason that was proffered was 'fear'- fear of the unknown, of the world of work, not knowing what to expect in the workplace, or not having a work ethic. Significantly, it also implied that some applicants showed signs of willingness to work but the uncertainties of work (as opposed to the certainties of benefits) were holding them back.

Notwithstanding these views, two of the same senior managers cited above also expressed contradictory views which suggested that they were incoherent in their views about the applicants' compliance with the policy:

> *"I don't think it's that people don't want to work, I think it's the barriers to them working, language difficulties, childcare etc."* (HB Manager, Ryde)

"Childcare is an issue, because quite clearly the cost of childcare is very high, a lot of these families have got young children which makes it even more difficult to consider work. So, that's a particular issue." (Senior Income Manager, Lismore).

In highlighting the barriers to work that some applicants faced, especially childcare costs, the research participants were rationalising the cost-benefit analysis of work for certain applicants. These research participants perceived applicants with young children as rational people facing legitimate problems, rather than simply being welfare dependent and displaying an unwillingness to work. Thus, applicants' rationality, it seemed, was not a way of them taking advantage of the system, as policymakers suggested, but one of making decisions that were in the best interests of their family unit. Therefore, they perceived these applicants' situation 'as temporary and context-sensitive rather than a fixed and abiding essence' (Alvesson *et al*, 2008:6). Besides, in this depiction, there was perhaps a slightly stronger focus on the economic and psychological rather than the sociological constructs for these research participants.

Thus, the narrative of the morally-bankrupt, welfare-dependent applicant might be misplaced as the applicants' problems were deciphered as economic in character. In other words, these instances of identity talk do not blame the applicants but instead portrayed as structural deficiencies. It suggests that some research participants did not imbibe the social constructions of applicants (as being lazy and irrational, caught up in a cycle of intergenerational dependency, or lacking motivation) just so that they could cope with the pressures of their work.

8.3.2. Conflicted Bureaucrat

In portraying some of the applicants as able but unwilling to work (which warranted the full sanctioning effects for their non-compliance), 'social work' participants constructed an identity of the conflicted bureaucrat because they know the applicants should be sanctioned but due to their status as statutorily homeless, they had to defer to the homelessness law rather than the policy. Prior to accepting a homeless

duty towards the applicants, the research participants would have assumed a paternalistic position, by determining what was best for the applicants, for example, withholding DHP, referring them to job club or advising them to move out of the district. By enforcing the local policy implementation rules in this way, the role of conflicted bureaucrat became part of research participants' identities as they 'reconciled their dual roles as helpers and agents of social control' (Taylor and Seale, 2013:311).

Other interesting identity dynamics were also revealed as research participants described how some applicants' attitude portrayed a sense of entitlement. The research participants' clearly-articulated views about applicants' identity construction aligned with the rules of homelessness law that grant the applicants (in their capacities as carers of dependent children) a right to housing assistance. This identity talk drew on a culture of dependency narrative which contrasts with the identity that the policy aimed to achieve, that is, the independent citizen. But viewing the never-worked, noncompliant applicant through the lens of an ever-working official is thus problematic as they are not only incomparable but, as indicated above, the applicants may have other personal and structural barriers. This false comparative view was elucidated by two research participants as follows:

> *"I don't think there should be an expectation that if somebody is in receipt of benefits, that they would be provided, as a right, by the council, a private property for them to live in an area of their choice that's then heavily subsidised by the taxpayer... I suppose, to be fair, everybody… people who work in local councils work and would therefore have some sympathy with why, 'I can't afford to live in this area so why would we be expected to provide somebody with housing in that area,' you know, everybody else has to cut their cloth accordingly and if they've got a certain budget then they go and live in an area where that sort of thing is affordable."* (TA Procurement Manager, Lismore)

> *"But the thing is, the trend [for benefit-capped people] was always, you'd claim benefits, and everything was given to them. And it's that that they need to be educated about. That it's not [their] God-given right…"* (Welfare Benefit Officer, Lismore)

This line of argumentation suggests a tension between taxpayers (workers) and the benefit recipients, even though these conditions may not be mutually exclusive. It also

suggested that an applicant's accommodation location preference is tied to their economic participation, framing the right to choose as the domain of the productive worker whose choices too were constrained by their ability to pay for housing.

In highlighting the attitude of applicants, these research participants were restating that the sense of entitlement was pervasive amongst the applicant population. They also suggested that the days of a something-for-nothing welfare state were over. The moral compass within which research participants held the applicants facilitated the development of a moral self with paternalistic overtones. Therefore, the more they compared themselves, as workers, with the applicants, the more justified they were of meting out punitive treatments to them.

Still, some research participants did not disparage applicants as much as others did. Those research participants saw their roles as that of a helper despite the constraints of their job. Instead, they criticised the policy design and its ramifications for the LA, as can be seen in the quote below:

> *"I'd like to think that they're far-reaching and they realise what a tsunami of homeless applications are going to arise as a result, but I fear that they only react to short-term and immediate crises, rather than thinking ahead" (Welfare Benefit Officer, Ryde).*

This research participant positioned himself as being sympathetic to the effects of the policy for the LA, but his views could also be construed as him advocating for the applicants to highlight the upheaval that the policy was likely to create for them.

In this analysis, the conflicted bureaucrat adopted a 'social worker' relationship with the applicant at the start of their encounter and maintained a surveillance stance throughout. For example, the welfare benefit officers and housing options officers reported that they provided tangible employment- and housing-related resources to tide the applicants over whilst they found ways, with the research participants' support, of complying with the policy. This is an example of their helper role. But this helper role was also a strategic and economic one as its aim was to ensure that the LAs received

the full housing benefits for the applicants in the end. This is because, under the policy, LAs do not receive the full temporary housing benefits from central government for the applicants as they do for 'compliant' applicants. Therefore, any shortfall in the cost of accommodation provided to the applicants was made up by the LAs themselves, which is why, it is in the LAs' best interest that the applicants comply with the policy. As such, 'social workers'' helping practices were not only for the cultivation of a responsible citizen, but more importantly, one of efficiency strategy for the LAs.

However, the helping role can quickly morph into a disciplinary one. Where the applicants do not comply with the conditions of the support provided by the LA, the disciplinary identity then becomes apparent. The portrayals of applicants as worthy of being disciplined, or sanctioned, appeared to reconcile the competing demands of help and control (Seale *et al*, 2012) that is, being both sympathetic towards applicants but also showing tough love to fulfil the objectives of the policy (Lipsky, 1980). So, for example, the HB participants can withdraw financial support from applicants who were deemed to be unwilling to address their lack of work ethic.

The research participants' responses analysed herein demonstrated that the policy goals were ambiguous and left them in an impossible situation in delivering for central government, the law, their LA and the applicant, all of which contributed to a conflicted identity due to the intensified goal contradictions (Taylor and Seale, 2013). This finding supports Lipsky's (1980) view that the conflict between client-oriented goals and policy goals were mutually exclusive. These conflicts, nevertheless, had a tendency to increase tensions between research participants and applicants.

8.4. Discussion and Summary

The patterns that emerged in research participants' language and repertoires described the reality and conduct of their practice and revealed the crises of confidence

and other conflicts in their professional roles. Research participants' conflicted values, goals, and purposes also seemed to increase their growing scepticism about the policy, a scepticism that was transferred to the effectiveness of their actual contribution to the policy's implementation, which suggests that the policy is meaningless to society.

Whilst the efficiency strategists engaged in emotion work, their frontline counterparts demonstrated empathy and sensitivity characterised by "emotional labour". This distinction did not mean that the two sets of research participants displayed distinct emotional responses to the policy implementation, nor 'to establish a separation between emotion work and emotional labour' (Escobar, 2014:34). Instead, the analysis sought to distinguish between street level and back office work in the classic and contemporary debates (Lipsky, 1980; Maynard-Moody and Musheno, 2003; Evans, 2010; Brodkin, 1997) that emphasised that dynamic, that is, whereas the street level work was relational, at the back-office, work comprised organisational engineering and fiscal prudence.

More fundamentally, this analysis assumes the presence of multiple, shifting and competing identities, even as these values appeared to conflict with the symbolic and actual identities of research participants (Alvesson *et al*, 2008). It also highlights the primacy of resources to enable the research participants to manage the fallout from the policy, particularly in providing affordable accommodation to the applicants. The findings thus point to the inadequacy of the resources that accompanied the policy decentralisation which meant that LAs' autonomy and implementation mandate are weakened. Hence, research participants' suggestions that the relationship between law and the identity of the applicants were more complex, often revealing a 'dual consciousness' (Munger, 2006:409). The law played a different role in research participant's narratives, which in turn, contributed to their identities being in flux. Such

232

discord, in regard to identities and behaviours, provided important windows into how research participants constructed their relationships with the applicants.

To summarise, given the nature of housing as a necessary good, an analysis of the interaction between the research participants and applicants provided a deeper appreciation of how identity interacts with implementation practice. Still, as indicated above, some of the research participants resolved the ambiguities created by the policy by negotiating and 'humanising' its ideological underpinnings, even if 'othering and boundary maintenance processes' (Taylor *et al*, 2016:27) were maintained.

Chapter 9 - Conclusions

9. Introduction

The BBC Panorama programme *Don't Cap My Benefits*, first broadcast in April 2014, along with other programmes such as Channel 4's *How to get a Council House*, filmed in Hounslow and Tower Hamlets, amongst others, brought social housing and the policy to the public's attention. These programmes led to little more public understanding of the daily issues that frontline housing/homelessness officers face, including dealing with high levels of demand that far outstripped the supply of affordable accommodation in and around the local areas. But we do not very often hear directly from homelessness officers who make the decisions on whether individuals should be given financial help, housed or turned away.

I began this thesis with a question: How and why have the practices of housing professionals in London changed following the introduction of the benefit cap policy? My aim was to provide an empirical account of the street-level realities of the benefit cap policy ('the policy') implementation, that is, to understand how implementation happened and the new forces that were shaping local homelessness provision. Given the policy's dynamic interactions with homelessness law, some unexpected results were uncovered. I have shown how what might have seemed straightforward and clear at the central government level can easily become contested and ambiguous at the local implementation level (Marston and McDonald, 2003). This recognition led me to agree with Clarke (2003), who argued that welfare policy is more than government edicts or their institutional arrangements but, rather, a variety of complex social and cultural activities that cannot be easily categorised.

Welfare reform has dominated political and strategic discussion in the housing sector in the United Kingdom since the key policy objectives were set out in the 2010 UK Government Spending Review and later incorporated in the Welfare Reform Act 2012. The policy embodied the values and ideologies of the majority Conservative Party in the coalition government (2010-2015) that stood for reducing public responsibility for vulnerable and poor people, pursuing its neoliberal agenda, and redefining the meaning of work and worklessness. It pursued these goals by, among other things, austerity cuts to public expenditure, 'making work pay', and 'simplifying' the benefits system.

Local authorities have taken steps to support households affected by the cap, partly to try and alleviate applicants' money worries and partly because the risk of increasing rent arrears is a threat to (social) landlords' operations. Local authorities do this through financial awards from the DHP funding which helps people who are entitled to housing benefit, or the housing element of Universal Credit, to meet their housing costs. However, LAs are able to exercise broad discretion when awarding DHPs. This means that the policy has left affected families at the mercy of a benefit system that is subjective and discretionary. Being discretionary, there are no guarantees that the applicants will get the support that they need to stay in their property, and where awards have been made, they come with conditions such as time limits, meaning that they would need to reapply at regular intervals. Ultimately, if their DHP runs out before they are able to move into work, they will be in danger of facing severe hardship and, perhaps, homelessness. *Even so*, not being awarded DHP by the Housing Benefit department does not make sense because those same applicants only end up in the housing department of the same LA to make a homeless application. At that point and, given this study's assessment that they would be found unintentionally homeless, the applicants would be owed a full housing duty. This means that, where applicants are unable to afford the cost

of any temporary housing provided by the LA in fulfilment of their housing duty, the cost of the housing falls to the LA.   Moreover, once a housing duty is accepted, it becomes incumbent on the LA to find settled accommodation for the applicants. And here is the rub: if the LA cannot find any accommodation that is suitable and affordable to the applicant, given their reduced benefits, the full housing duty still remains with the LA. Although not related to the policy, the research uncovered instances where some homeless households have been in TA for 10 years or more. In other words, the LAs may never be able to discharge their housing duty towards some applicants, especially those who have a token 50p housing benefit award because they have reached the ceiling of their total benefit entitlement for any further award of housing benefit to be made. It can be clearly seen from this process that the arguments for and against the policy are as much about politics as about the proper role for benefits. In cases where the LA accepts a full housing duty, the applicants are not being 'punished' (as intended by the policy) because, being the carers of school-aged children, they are guaranteed accommodation when homeless, even in the face of the cap.

Therefore, this policy which imposes a low cap on workless families, especially as it is not set by reference to needs and prices, will always and inevitably cause dilemmas in practice. On the one hand, its proponents argue that it is moral and fair to ensure that families in which people are unemployed, but able to work, should not get more in benefits than the average working family can earn. On the other hand, its critics argue that it is arbitrary, it takes no account of the differences in rents and standards of living in different parts of the country and it is immoral to force vulnerable families out of their homes. In the UK, there is *probably a consensus* among the public and politicians from *both* sides of the debate that there exist limits to acceptable 'punishment' i.e. that there needs to be a safety net even for those deemed non-compliant with their work-search conditions.

Imposing an arbitrary, punitive and low ceiling on the maximum benefits people can get was always going to have knock-on effects; increase demands on other welfare services (public and voluntary sector), for example, on child welfare services; create instability in children's education as families are forced to move throughout the school year; increases in applications for the disability benefit, personal independence payment, to obtain exemption from the cap; and mental health needs assessments. But we have to live with an arbitrary, punitive and low ceiling. Costs would always simply be shunted from one budget to another – thereby co-opting other arms of government into the policy implementation. That is the reality of the policy on the ground.

Given the legality of LA decision-making in regard to their responses to requests for housing assistance from an eligible homeless person, which is set out in law, it is perhaps not surprising that it is hard for academic researchers to gain access to local authority housing departments. One of the achievements of this study was that I did succeed in getting access. I employed a qualitative research strategy to gain a deep and nuanced understanding of the complexities of policy implementation, by engaging with the reflections and experiences of key housing professionals. Through rich interviews with key local actors at three geographical locations in London and an analysis of key documents, I opened a window on the differing approaches to policy implementation of:

- Three LAs and how local conditions impacted on how the policy was applied in practice according to the organisational dynamics and the local policies within different organisational and administrative cultural settings; as well as

- Housing professionals as individuals, their experiences and practices under a new set of functions to their roles.

As already mentioned, this research was an analysis of the interaction of the policy with the law on housing/homelessness from the viewpoint of the housing professional.

It was *not* an analysis of DHP. DHP is useful for preventing the homelessness of affected applicants but this is not always successful and homelessness duties subsequently arise.

9.1. A policy implementation perspective

From an implementation perspective, it is generally accepted that to view central government as the primary determinant of policy outcomes from inception through to implementation is fundamentally flawed (Hill and Hupe, 2009). Social policy research needs to evaluate the aggregate influences manifest at the frontline (Evans, 1999). Every policy has to have some kind of administration, and where structures exist, they acquire their own rationale and methods of working. Divisions in administration structures always and everywhere imply issues of gaps between policy in theory and policy in practice. I argue in the same vein as Alden (2015) of the importance of understanding how frontline delivery may impact on the quality of service provided. To comprehend the impact of welfare policy on homelessness law, and the forces that drive LAs to interpret or act upon directives in a particular way, it was necessary to investigate how that policy was delivered. The perspectives provided by Lipsky's street-level bureaucracy, which gives credence to the critical role that statutory workers play in policy formation and dissemination, provided the best fit for the purposes of understanding the operations of the LAs.

This research contributes to our understanding of the policy process. In operationalising policy, that is, of translating policy into practice, the benchmark is what ought to happen. Implementation, on the other hand is what actually happened. Understanding how implementation works is fundamental to the success or failure of policies (McConnell, 2010). Implementation can channel policy towards, or divert policy away from, its intended course.

I started this research by acknowledging that implementation is never perfect. One test of the success of implementation, is whether as a means to an end, it produces the desired outcome i.e. how far the implementation is consistent with the policy (McConnell, 2010). The test I used was *not* this definition of integrity, and *not* whether applicants moved into work or found cheaper accommodation as a result of the policy, instead I employed another measure of the success of the implementation. This focused on the times when the implementation process itself matters, as well as the impact on housing professionals. For example, I argue that it matters how housing professionals feel about their work, not just how housing is allocated to applicants.

Besides, 'implementation is not a linear or sequential process' (Spicker, 2006:148). It is better to see implementation as a system with relationships between processes and different actors. In the case of the benefit cap policy, the actors include applicants, housing professionals, housing providers and the DWP. But this research focused on just one group of actors – housing professionals. This research revealed struggles between different housing professional actors - efficiency strategists and the frontline street-level bureaucrat or 'social workers' - who had different views about homelessness provision and housing assistance within different local cultural milieu.

Implementation is also a politicised process that can be conceptualised as a coalition of interests, involving rational actors. From this perspective, different factions and interest groups compete, deliberate and negotiate during the implementation process. Some see officials as 'self-interested bureaucrats' (Egeberg, 1995). Others have emphasised other officer motivations which include the belief that the service they work in is making a contribution to society. The emphasis of this research on the behaviour of officials situates it decisively in this approach to understanding the policy process.

The first task was to describe, or map out, what was actually happening in the process of implementation. To start with, the policy was framed by central government as being best implemented at the local level, in the housing benefit department of local authorities, where the cap could most easily be applied to individual applicants' benefit entitlements. Decentralising the policy in this way gave LAs no option but to implement the policy. Moreover, any financial assistance offered to affected benefit claimants is circumscribed by centrally-determined use and distribution criteria of the DHP grants. This means that the government continues to steer and influence the policy remotely through guidance on how the grant should be used and distributed. The guidance also prescribed a limit on the amount that LAs could top the usually-insufficient amounts by, thereby restricting their provision of local welfare. Thus, the analysis revealed that the policy was being negotiated in a climate where the government adopted a 'cut-and-devolve' approach to some aspects of welfare reform (Meers, 2017). The findings uncovered a sense of fatalism as it was believed that LAs would always be the 'dumping ground' for implementing unpopular government policies. However, there were also positive stories of LAs adapting to the new circumstances that their customers were finding themselves in.

These facts have changed the nature of LAs' services at organisation level and also changed the role of housing professionals working in those organisations. It is these particular consequences of the policy that I studied.

9.2. Conclusions

9.2.1. How and why have the practices of housing professionals in London <u>changed</u> following the introduction of the benefit cap policy?

Central government, through austerity and regulation, has placed new pressures on LAs in addition to the conditions of the housing market. These, in turn, have impacted

on the role of the housing worker. The biggest practical impact on frontline housing roles, according to Richardson and colleagues (2014), have been from:

1) The raft of benefit changes introduced through the welfare reform programme (including the benefit cap); followed by

2) Shortage of local housing; both of which contribute to

3) The increasing gap between families' income and housing costs.

However, while acknowledging that for many in the housing sector, the policy is perceived as a 'game changer', it is also important to note that it is but one of a number of factors driving behavioural and systemic change in the sector. With reference to point (3) above, there are compounding issues around zero-hours contracts and in-work poverty. With reference to point (1) above, there have been various benefit cuts under the umbrella of welfare reform. Thus, the policy has only served to compound the effects of other housing-related changes. These changes include:

- Social renting under-occupation penalty ('bedroom tax') (April 2013).

- Private Rented Sector (PRS) local housing allowance (LHA) lower limits (introduced April 2011).

- The introduction of Universal Credit: a single, working-age benefit that will include an element for housing costs made directly to claimants.

- The uprating of benefits by CPI rather than RPI (introduced in April 2013).

- For 2014 and 2015, LHA and a range of other working age benefits were capped at a 1% cash increase.

- Amendments to benefits applied to supported and temporary accommodation e.g. those living in TA are subject to the new LHA rate.

Another source of financial headaches for LAs emanate from the DHP grants that central government allocate to LAs to absorb the worst effects of the policy on homelessness. However, the amounts allocated have been insufficient to meet local need. Furthermore, the bureaucracy associated with assessing individual needs for DHP award, as opposed to universal entitlement to housing benefit according to status, have created an administrative burden on the LAs.

In this research, I have referred to housing department officials in local authorities as 'housing professionals.' But what is a 'professional' in this context? Often viewed as a 'common-sense' occupation, housing practice has been unable to draw upon a 'discrete and easily defensible knowledge domain' (Furbey, Reid and Cole, 2001:37). Researchers such as Allen (2003), Casey (2008), and Casey and Allen (2004) have described housing as a 'semi' or 'incomplete' profession, characterised by shorter training, less legitimised status, a less specialised body of knowledge and less autonomy from supervision (Etzioni, 1969) in contrast to other professions such as medicine, law or architecture. Rather than being seen as having specialist knowledge and skills, LA housing officials are regarded as administrators who undertake low low-level tasks such as processing housing benefit claims, allocation of accommodation, and interviewing people to decide if they are eligible for help with their housing (Laffin, 1986:107-108). Others (e.g. Casey and Allen, 2005) believe that 'housing' was seen, in the past, as a semi-professional occupation which means it lacks either a basis of technical skills or a distinct knowledge base. The stigma attached to the concept of social renting in England (see, for example, Watt, 2008) has also had consequences for self-identities, motivations and attitudes of those working within the sector.

Besides, 'housing' has long been one of the weakest examples of professionalisation within the embodied welfare system (Manzi and Richardson, 2017). Casey (2008:765)

referred to the 'spoiled identity' of housing managers who struggle with the demands of managing within a marginalised or 'invisible' profession. It has, thus, been particularly difficult for housing professionals to carve out a distinctive sense of identity at a time when the social contribution of housing practice is consistently undermined and undervalued. The social values traditionally held by housing practitioners, for example, commitment to social justice, equity and tackling disadvantage, create specific conflicts with the relentless logic of neoliberalism. In the past, the lack of a distinctive definition of the role of housing managers compounded the difficulty of defining a clear identity for these groups. Thus, for Clapham (1997), the social construction of the housing manager has varied between interpretations of its personal (caring) role and a more business-like entrepreneurialism. This tension has been a constant and increasing feature in English housing, creating additional pressure on the self-identity of housing professionals. Housing professionals struggle to reconcile these demands, and the dominance of 'head over heart' has become increasingly evident.

Pressures on LAs as organisations

Institutional arrangements gave scope for different models of implementation amongst the LAs. Yet, based on the views of the research participants, I identified organisational-level factors that affected housing professionals' practices that were common across the three LAs:

1. Content of the policy:

   - Lack of agreement between LAs and central government on how the new policy fitted with existing and related policies.

   - Lack of clarity from central government about the intended policy outcomes and how the housing needs of affected applicants should be met by LAs in the new policy context.

2. Local context:

- Implementing the policy was a poor fit with existing local organisational responsibilities and values.

- Lack of resources to support the added responsibilities of implementing the policy.

One key concept repeated across this research is *inconsistency*. This means that some of the implementation arrangements conflict with the *policy objectives and priorities*. I found evidence of the incompatibility of central government policy rhetoric with local application of the policy in practice, especially with regard to sanctioning the applicants. I have shown that the idea of economically sanctioning applicants through their housing benefits, only for the same applicants to be owed the full housing duty when they become homeless (or are prevented from becoming homeless) as a result of the sanctions, is incompatible. This divergence between layers of government matters because it potentially limits the effectiveness of the policy at shifting unemployed working age people into employment. This inconsistency also arose partly because affected applicants could still obtain housing assistance through the safety net of statutory housing provision. Such applicants were not 'punished' for being out of work, as intended, rendering capping pointless and meaningless. Central government's rationale for capping, thus, collided with LAs' interests in local responsiveness.

Another key concept across the thesis is *divergence*. The geographical lens of this study provided a powerful insight into the various and varying modes of implementation. The comparative nature of the research exposed the divergences pertaining to conditionality of financial assistance between LAs. Since the inception of the policy, LAs' reliance on financial supplements, such as DHP, to perform homelessness prevention duties has substantially increased the local variation in the policy implementation. I

attributed these variations mainly to the location of the LA (*ergo*, housing supply and cost). Several factors explained the divergences. In particular, the perspectives of the research participants exposed the simplistic ideas of the policymakers by drawing attention to the heterogeneous local dimensions of LAs which ensured that achieving equality in service provision across the LAs was difficult. The empirical data highlighted the divergences in the implementation mechanisms that the LAs adopted. This challenged any notion that, because LAs operate within the same legal framework, they should provide similar services. It also suggests that applicants were subject to a 'postcode lottery'.

One of the divergences was the variations in LAs procedures and practices for policy implementation in regard to meeting statutory housing obligations. My analysis suggests that the heterogeneity of interpretation and practice, combined with variations in resource availability and the capacity of managers, have thus impacted on the translation of the policy into practice. This research also found that, although housing professionals had comparable administrative tasks and occupational roles both within and between LAs, the ways in which individual officers interpreted and implemented the policy differed, which I attributed, in part, to the implementation mechanisms that the LAs adopted.

On the other hand, one of the main convergences was the practice of accommodating the applicants out-of-borough in fulfilment of LAs' housing duties. It was striking to find that out-of-borough accommodation was no longer a novel, or radical, way of providing homelessness assistance.

Pressures on housing professionals as individuals

Housing professionals' power was restricted by the LAs through local policies and managerial control. Even so, relational factors such as housing professionals' attitudes and beliefs were also evident, as this section will demonstrate.

Frontline housing professionals can change lives, even save lives – and the service they provide is of immense social value. They are often the one constant in vulnerable peoples' lives. Thus, housing professionals occupy a special position as they straddle the spaces between the policy and providing a service to the applicants. Whilst I expected that officers with different job titles would have different priorities, in fact, their views converged around the dire circumstances of implementation and the consequent impact on service provision. However, mid-level housing professionals related to the difficulties of homelessness provision fairly broadly, both in terms of understanding the connections to structural issues and of future directions for the LA in a changing social and political climate. These middle management research participants, though not wholly subscribing to the policy rhetoric of self-sufficiency and reduced welfare dependency, nonetheless, believed that their interpretations of the policy into local practice, were the best that could be achieved for a standardised and fair service. Frontline housing professionals, on the other hand, were more focused on managing applicant expectations and with developing coping strategies to deal with the combination of reduced resources and increased demands (Lipsky, 1980) and the new requirements of their roles as agents of social control.

The impact of the policy on housing professionals' role has been an unintended consequence of the policy. Still, the government must have known that the policy was likely to increase homelessness, as confirmed by the pilot. Yet, this issue was dealt with strategically with the provision of DHP to deal with the fallout from the policy. There is

246

no doubt that welfare reform and the cost of housing is having a huge impact on many benefit claimants, and that this is being filtered through to frontline housing professionals. Yet, the effect on frontline housing professionals' roles and working conditions was not considered. My research has exposed the pressures that housing professionals are under from welfare reform and the housing shortage. So, what has changed for housing professionals?

The stresses on housing professionals are huge. They are dealing with members of the public who are desperate and in extreme distress. The job of a housing professional has become *more intense*. It was worrying to hear that research participants felt so much anger at being required to be 'all singing and all dancing' to everyone. This research also uncovered that frontline housing professionals find themselves in increasingly challenging situations with applicants. This is borne out in the testimony of the research participants who were seeing applicants in increasingly desperate circumstances, often presenting with complex and compounding needs. Desperation has thus become a grim part of daily life for frontline housing professionals since the introduction of welfare reform (Stockdale, 2014). Therefore, I contend that frontline housing workers will need support and resilience training to help them deal with the challenges of the role in future.

Something else that struck me during the research was the diversity of frontline housing roles and the scope of services workers are now expected to deliver. The welfare reforms, outlined above, are requiring housing professionals to develop a different knowledge base and a new set of skills. LAs are moving towards a housing service which includes assessing applicants' housing as well as social needs and facilitating support packages. In addition to interviewing people to assess their housing needs and processing housing benefit claims, housing professionals are now *going into a support role* which is alien to LA housing/homelessness work. The policy has stimulated new kinds of

services for applicants (e.g. welfare benefit officer) that enforce more conditionality in housing and homelessness provision.

When the benefit cap is applied, or housing/homelessness assistance is provided to applicants, their interactions with housing professionals do not stop. Rather, support packages have become dynamic organisational tools, which are actively assembled, and managed, by the housing professionals that include job clubs, employment and training referrals, debt management and budgeting, and skills development programmes. These additional services were historically not part of homelessness and housing provision but have become commonplace following the enactment of the policy (and other welfare reforms affecting housing).

Housing professionals have long been under pressure to get rent arrears down to a minimum, but these pressures have been compounded by the policy. Consequently, *debt management* has become a crucial service in LAs which requires increased knowledge of welfare benefits and budgeting skills advice among frontline housing staff. In this role, housing professionals, unlike previously, now need the skills to balance an applicant's income and expenditure, and help look at areas where they could, realistically, tighten their belts. Housing professionals also now need negotiation skills for interacting with private housing providers whilst they attempt to prevent applicants' homelessness.

Unfortunately, although there is a requirement for support providers and statutory agencies to work together, almost all of the housing professionals I spoke to had real *difficulties in obtaining joined-up support for applicants*. Compounding lack of co-ordination, partner agencies were cutting services or closing down. Waiting times and referral routes (e.g. Citizens' Advice) for support often prevented applicants from accessing timely support and frontline housing professionals were increasingly being required to step in. There seems to be a tacit expectation that frontline housing professionals will fill the gap left by the withdrawal of other local services. Indeed, I found that housing

professionals are *'plugging the gap'* in support services and by doing so were treading into unfamiliar territory. Effective problem identification, appropriate signposting and referral, and timely follow-up as part of a co-ordinated case management approach are new skills frontline staff now need.

Built into the policy was the expectation that it could be an avenue for disciplining 'recalcitrant' welfare recipients. Consequently, housing professionals' jobs have changed in that they are required, as part of the implementation of the policy, to *apply conditions* in the prevention stages of the applicant's housing journey (as Table 2 depicted), at a point before a homeless application is made. The conditionality tactics may include compulsory participation in job hunting, skills development and budgeting training. As such, this research found that housing professionals' roles are now not only about helping, but also about enforcing stricter obligations on applicants. This produced conflicts with the established professional boundaries and norms.

Housing professionals also have to contend with a *changing relationship with applicants*. Research participants said that applicants did not understand changes that ran counter to their hopes and expectations of being housed by the LA. Housing professionals said there needs to be a change in the expectations of applicants away from the idea that 'the council [LA] have to help us.' Furthermore, research participants were finding that the increasing emphasis being placed on micro-managing applicants' personal finances meant that they were intruding into applicants' private lives like never before, and this has changed the professional-applicant relationship. And where applicants recognised this intrusion as a prelude to the unfaithfulness (as in 'unlawfulness') of the LAs' implementation practices, they displayed their 'legal consciousness' (Cowan, 2004), by resisting the research participants' professional power in the way they are treated.

As this research shows, working in housing profession today exposes workers to challenging situations. Housing professionals face new *ethical issues* and conflicting moral

choices at work, as does the importance of knowing how to handle these issues. Research participants' accounts suggested fundamental personal ethical dilemmas between concerns for social justice (e.g. in the form of basic homelessness provision to protect family dignity and safety) and the need for welfare state reform. There was widening divergence of views among housing professionals about where the responsibility for homelessness lies when affected applicants become homeless. In such scenarios, the research participants faced personal dilemmas about how to simultaneously reconcile supporting and disciplining the applicants. For example, to what extent should they focus on enforcing applicants' social obligations and responsibilities versus addressing directly their housing needs? This research, thus, set out to raise the fundamental issue about the idiosyncrasies of statutory homelessness duties and its interactions with the social citizenship and 'responsibilisation' that the policy embodies. The analysis suggests that policymakers' focus on 'responsibilisation' and social citizenship deflects attention away from the traditional causes of poverty, worklessness and welfare dependency. These factors were manifested, dynamically, as they combined in multiple and complex ways in the analysis.

9.2.2. How have LAs interpreted the DHP requirements and homelessness legislation in light of the benefit cap policy?

Politicians' speeches and writings were a powerful source for understanding how political and ideological privileges were used to formulate the policy (Scrase and Ockwell, 2010) and how the language therein helped to construct an imagery about accepted norms, values and beliefs (Wiggan, 2012). The documents revealed discourses that were constructed about social security which focused mainly on the 'deepening of neo-liberalisation in the context of threats to political hegemony' (Wiggan, 2012). Bourdieu and Wacquant (2001) regard neo-liberalism as 'a new type of imperialism' and the discourse that emerges as 'a form of *symbolic violence* that relies

on a relationship of constrained communication to extort submission' (p. 2). They contend that neo-liberal discourse is distinct from other political discourses in that it 'mimics science by superimposing the appearance of reason, especially economic, on the social fantasies of the dominant' (p. 4). Neo-liberal discourse, in this case, is a powerful weapon in maintaining dominant power relations. Moreover, this power dynamic was obscured by the policy narratives of 'inevitability' and 'lack of agency.'

In revealing the narratives and storylines of the debates on welfare reform, I have drawn upon the discourses that were evident, using them to think critically about language within the operational context of this research. I argued, in line with Fairclough (2002), that there is 'a textual moment in any social practice'. In this case, the textual moment has been differentiated into three facets – policy, procedure and administration.

The storyline approach of the narratives underlines the way in which policy change is presented in order to appeal to the wider public and gain support for the reforms. This was captured in the literature on conditionality which is typified by the tropes of deservingness, making work pay, fairness, austerity, self-sufficiency and fiscal prudence. The political narratives also contained 'various accountability and evaluative warrants and modes of legitimation' (Wiggan, 2017) that framed the 'old' welfare system as broken and, therefore, badly in need of reform. These policy narratives were guided by the belief that claimant poverty was a result of their irresponsible behaviour and moral shortcomings rather than the result of structural inequalities within all areas of society but, especially, within the economy. From this perspective, the policy was not just developed to manage 'worklessness' but was also aimed at reinforcing a system of values and beliefs about how all citizens should behave (Marston, 2008). Furthermore, the documents highlight the power dimension to the changing role of LAs within the welfare system. This reality, as well as the discursive developments that

drive the policy implementation process, are not unique to the LAs that were researched. The structural constraints that generate these discursive developments are felt by all LAs in London given that structural and economic imperatives are common amongst them. The differences are the unique local practices that each deploy which reflect local party politics and organisational culture.

The power dimension in the policy implementation was manifest in the local policies that LAs drew up to practice policy. Yet, as the analysis suggests, the underlying power dynamic rests with the central government in the allocation of resources and legislative functions (Chaney and Wincott, 2014). This power dynamic enables the central government to retain control and budgetary oversight of resources (e.g. DHP grant), but the most important factor, political risk (e.g. blame and local accountability), is transferred to LAs in the form of delivery responsibility.

In summary, the documents illustrated how this narrative approach can provide deconstructive relevance to welfare reform debates. From these debates, further insights were provided into the production and regulation of subjectivities via policy practices which, in the Foucauldian sense of struggle and resistance, also revealed glimpses of resistance (Burman *et al*, 2017) (e.g. Ryde's failure to draw up a housing allocation policy even after two years of being required to do so).

9.2.3. How and why have the factors that affect how frontline housing professionals make decisions changed following the introduction of the benefit cap policy?

The LAs in which I conducted the research were making tenancy sustainment (that is, homelessness prevention) their top priority in view of the policy. There was a coherent rationale these days among housing professionals for the emphasis on homelessness *prevention* in its varied forms, because it is through the route of homeless assessments that applicants were provided with TA (Pawson, 2007), which is much more

expensive. It should be noted that since this research was conducted, homelessness prevention has been made a legal requirement with the enactment of the Homelessness Reduction Act 2017. Homelessness prevention covers everything from tiny interventions like help with filling in a form, right through to paying off rent arrears to enable the applicant to remain in their home or helping applicants, financially or otherwise, to secure cheaper accommodation. Housing professionals increasingly have to engage in increasingly hard but honest conversations from the start around what applicants can realistically afford. Lund, 2011 has argued that the 'homelessness prevention agenda is a political cloak to mask the true levels of homelessness and improve on the politically-damaging homeless statistics' (p.169), rather than a genuine desire to assist those in housing difficulty. This may, partly, explain why prevention initiatives have tended to focus on groups who are classed as being in priority need (Pleace and Jones, 2010).

The local authorities emphasised the importance of taking a case-by-case approach to assessing DHP applications, in recognition of the multiple and complex circumstances that lead people to apply. *Exercising discretion* of this sort, whilst judging each DHP application as to its merit, is a new decision-making role that is alien to housing professionals who had been used to applying eligibility rules only. Local authorities, like other government agencies, are required to meet certain standards of public service, especially those of democratic accountability, probity, transparency and equity which do not apply to the same degree in the private sector. Because of these requirements, local authorities have traditionally emphasised *procedural fairness* constraints on the actions taken by officials, for example, in the allocation of housing according to standardised rules that limit officer discretion. A downgrading of 'process' as an effective way of running a local housing department was one of the most consistent pieces of evidence

coming through the interviews. So, for some frontline workers, they did not just follow procedures but also used their discretion in work processes. This finding confirms Lipsky's (1980) theory on street-level bureaucracy in relation to officer discretion.

In the past, housing managers used to grade applicants, unofficially, according to moral standards of cleanliness and the likelihood they would be well-behaved tenants, before they could be matched to the 'right' type of neighbourhood (Bretherton *et al*, 2013; Saugeres, 2000). Whilst this is not widely practiced anymore, this research found that the criteria for an applicant to be granted DHP did include moral and behavioural judgements and revealed the political and social rationales that were applied and/or negotiated in the implementation arrangements. But housing professionals bypassed this moral dimension of the policy's disciplinary role, to award financial assistance to some 'undeserving' applicants, thus resisting top-down policymaking.

Rationing strategies also have had a direct bearing on how housing professionals were performing their decision-making. Whilst such decision-making was performed with reference to the authority of the law, it was evident that they *did not always follow the law*. One research participant felt that housing law could be interpreted 'tightly' or 'loosely'. This is because they viewed the law as a social construct and it was understood and interpreted differently by housing professionals. But on the whole, given that housing professionals have had to provide accommodation to the applicants just as they would any other eligible persons, it appeared that it was business as usual. Thus, the meaning that the law attributes to the applicants' identity and the housing professionals' interpretation of the law had not shifted or changed in significant ways.

The ground-level approach of the research enabled me to tap into a solid information base of housing professionals' understandings and experiences of policy implementation. This rich source of local knowledge pointed to some of the *resistant*

practices towards the policy's implementation. The incidences of resistance, both from the LAs and the housing professionals (as well as the applicants), were in reaction to the policy's disciplinary intents and meaningless to society and for the applicants. It was also because of the implementation gap that it created for the LAs. As such, 'goal displacement' subverted the initial objectives of the policy. Housing professionals therefore took advantage of the cracks in dominant governing rationales to implement new mentalities of rule that surround contemporary housing provision. What emerged was a new situation of multiple constructions of homelessness assistance and provision by the research participants, situated between the policy and the law.

9.2.4. How and why has implementation of the benefit cap policy influenced housing professionals' identities?

This research found that alongside managerial and organisational pressures, personal views also played an important role in shaping decisions. Whilst there has been a considerable literature on the effects of austerity on social housing sector, the implications of these factors in the development of professional identities in the homelessness sector and, in turn, decision-making by housing professionals, have been rarely considered. Subject to widespread hostility from politicians (of both left and right, albeit for different reasons), increasing scrutiny from managers and hostility from applicants, 'housing professionalism' has struggled to carve out a distinctive identity within the welfare system. Public sector austerity, wherein housing services have faced the brunt of public expenditure reductions, has generated intense debate about the identity of the contemporary practice. In this respect, housing has something in common with notions of other public sector professions that have been reshaped under conditions of neoliberalism and welfare retrenchment (Laffin and Entwistle, 1999). My motivation in this research was not to pass judgement on housing professionals, but to reveal and illuminate the tensions and contradictions that they experienced during the

policy's implementation as well as the effects on their emotional wellbeing. Work pressures emanated not only from the practicalities of implementing the policy, but also from the political agenda of conditionality that does not sit well with many housing professionals' motivations.

My analysis captured the inter-subjectivities of organisational life in LAs in an empathetic manner and demonstrated the powerful role that emotions played in organising processes and outputs (Alvesson *et al*, 2008:7). Narratives of law, identity, and deregulation of welfare provided windows into the motives and actions of the research participants, yet they were themselves part of the process of constructing the relationships between the applicants and the LAs. Narratives served a critical step in identity formation, because they explained who the research participants were and how they related to others. The findings of this study thus contribute to the sociological literature on professional identities by opening up new ground in research to highlight the (re)production of identities in the field of homelessness provision. Developing Jacobs and colleagues (2004) interpretation of social constructionism, I found that those working in housing developed their own, sometimes competing, interpretations of the roles, identities and purposes. One of the original elements of this thesis was categorising a five-part typology of contemporary housing professionals' identities - '*social worker',* *efficiency strategists, conflicted bureaucrats, 'firefighter'*, and *frustrated intermediary*.

My central argument is that a dominant logic of welfare reform has culminated in a crisis of identity for the housing sector. For example, some of the research participants had a strong professional self-identity not dissimilar to that of a helper, and therefore an affinity with the '**social worker**' identity. Requiring applicants to be active, rather than passive, receivers of services has been a paradigm shift, but some 'social worker' housing professionals were reluctant to let go of problem cases, acting as 'fixers' or 'rescuers.' But the metaphor of '*firefighter'* more aptly described their role because, day-to-day, they

were unable to perform the helping part of their jobs well. In this sense, the policy was most damaging for those housing professionals who sought a stronger sense of professional identity. Others felt frustrated as a direct result of the lack of resources to do their job, rather than because of their feelings about the impact the policy was having on some of the applicants.

The difficulty in constructing a professional identity for the contemporary housing professional was compounded by the competing demands of social purpose and being at the frontline of applying a policy of conditionality, which generated particular tensions for housing professionals. Housing professionals could be split into those whose intention was to help people, and those who deemed it their primary goal to gate-keep and protect resources. Or, as some research participants suggested, 'hard' or 'soft' decision-makers, meaning some of them positioned themselves to ignore or assert rights (Munger, 2006). Decision-making was determined, at least in part, by this two-way split. Some housing professionals called to mind the cultures of poverty and entitlement to blame the applicants for their plight, together with the ingrained belief that applicants do not give the full picture about their circumstances as a matter of course. The effect is seen in their professional identities, one of which is *frustrated intermediary*, that is, they know the applicants should be 'punished', but not being in possession of the full facts, they are unable to sanction them. Moreover, given that some of the research participants subscribed to the policy's rhetoric, which labelled some of the applicants as unmotivated (and so undeserving of help), they too were (un)wittingly reinforcing inequality and stereotypes.

Nevertheless, not all of the research participants had negative stereotypical views about the applicants, perhaps because they were more ideologically-aware than some of their colleagues. This observation was most manifest where housing professionals were frustrated with the impossible task that the policy had set them. This frustration with

the policy led to sympathy for the applicants and blaming, not so much the individual, but the structural barriers that trap them in poverty.

For their part, the *efficiency strategists* were the 'bureaucratic personalities' who oversaw and monitored the work of frontline research participants. These housing professionals were most susceptible to invoking the neoliberal and paternalistic ideologies that the policy embodied. Some housing professionals perceived themselves as *conflicted bureaucrats* as their experiences of service at the frontline were opposed. Yet, these dynamics may not be resolvable, even as concrete solutions are needed, given the strict interpretations of the law by the courts as it does not take into consideration the realities of resource scarcity that LAs face.

Housing professionals coped with workplace frustrations and struggles in different ways. In terms of their occupational professionalism, some resorted to more rule-bound practices, whereas others became more applicant-responsive. For some, their sense of professionalism engendered a reluctant sense of resignation to organisational rather than occupational priorities (Tummers *et al*, 2012). In portraying themselves as effective and committed workers in these roles, the research participants deflected any blame for the harshness of the policy. Instead they refocused the issues and problems of policy implementation on the government regulations and guidance documents.

This study also highlights some of the ways that housing professionals responded to the policy's disciplinary intentions through emotional labour and identity talk. In particular, it showed how the research participants managed the material and emotional consequences of welfare austerity. Emotion work can increase job satisfaction. But in this case, the theory on emotional labour was borne out by the prevalence of frustrations and 'struggle' in the interviews. Despite their private feelings, some of the research participants displayed other public, emotional distance to simultaneously preserve their professional boundaries and take care of their personal wellbeing. This highlights the

social construction and complexity of emotions, or as Hochschild (2003) suggested, 'how the feeling rules work' (p.56).

For the frontline housing professionals, 'crisis' is now a daily part of their work and this has a significant emotional impact on them. Rules that required suppression of negative emotions were emotionally taxing. Affective perspectives suggested that welfare reform had not only transformed the role of the housing professional (e.g. *frustrated intermediary*) but austerity has also reduced their ability to provide assistance to applicants, which left some of them feeling disillusioned. In the past, housing professionals felt optimistic that applicants had a chance of finding decent places to live, but that is no longer the case. They described the realities of having fewer options to house people. Research participants reported that it felt like the clock is turning backwards, with more people being stuck in TA for a lot longer than six weeks. The additional pressures that the housing professionals encountered whilst implementing the policy decreased their job satisfaction with possible implications for poorer wellbeing (e.g. increased sickness leave) and higher staff turnover. Therefore, they need co-worker support and resilience skills to bounce back quickly from setbacks and the harmful impact of emotional demands.

In summary, this research found that housing professionals displayed affective perspectives which accompanied their actions and judgements in their roles. This finding debunks the myth that housing provision is purely an administrative task. The interaction between housing professional and applicant also produced, through bureaucracy and emotions, psychosocial connections (Bennett, 2009). The findings of this research also reveal that the research participants' personal, organisational and occupational professionalism influenced the extent to which they experienced new work-related emotions during the policy implementation. Thus, the policy had challenged housing professionals' traditional notions and experiences of homelessness provision.

Consequently, some of the implementation arrangements conflicted with the research participants' occupational identities. This has implications for their professional identities that were found to be in flux, even if the traditional public sector ethos of welfare provision was not wholly discarded (Casey, 2008).

9.3. Limitations of the study

Despite the success of the research, the study design has some limitations, not least because it relied heavily on the experiences of specific housing professionals and their efforts and experiences within the policy implementation structure as well as their accounts of the LAs' creative implementation practices. It, therefore, does not reflect the work of other local actors or other service areas that may have been involved, remotely or otherwise, in the policy implementation which restricted the multiplicity of accounts and experiences that is informed by numbers. These limitations have been attributed to the lack of personal resources to conduct the research but, more importantly, the difficulties in gaining access to a wider sample which meant that more diverse data could not be obtained.

Furthermore, even though the LAs in England operate within the same legal parameters, the results of this study cannot be extrapolated to all LAs in London, let alone England, mainly because of the local political influences on policy implementation and the local demographic factors that the research revealed. Thus, the argumentations and technologies of implementation, although potentially applicable to all LAs, would be rather different as would be the number of applicants in each LA. Specifically, given scarce resources, inconsistent interpretation of policy, practice inconsistencies, diversity of applicants' needs and lack of consensus about what constitutes 'suitable accommodation', a robust research design for a full comparative study and generalisable finding would be difficult.

Without undertaking a very large follow-up study of housing professionals, it is not easy to confirm that the role of frontline housing staff has altered significantly across England, with a move away from the legal aspect of housing provision and towards financial and social support and advice. But the changes I documented are certainly becoming a trend as concerns over increased homelessness amongst the affected recipients has impacted on the housing professionals' role. Nevertheless, we can still learn about how welfare policy is being implemented as I obtained and examined the viewpoints of some research participants in leadership positions who formulated local implementation strategies (Seefeldt, Sandfort, and Danziger, 1998). Not only do their accounts show the effectiveness (or otherwise) of their management and implementation strategies, it also tells how committed they were to the policy objectives.

Moreover, despite the study being conducted in only three out of the 33 LAs in London, lessons could be learnt from their shared regional location and concomitant structural issues. This was a useful research tactic as some of the mechanisms for implementation, for example, homelessness prevention and provision, were more challenging in London than elsewhere in the country. Hence, the conclusion on the challenges and dilemmas that this study unearthed: firefighting in an implementation environment consumed by resource shortages and distorted professional norms in the midst of strong organisational and legal forces.

In addition, the localised setting of the study meant that conclusions cannot be drawn beyond the three LAs investigated, except in analytically similar situations. Looking at areas with relatively low housing costs (compared to London) would undoubtedly have strengthened my empirical design as it would show how those LAs managed the implementation process. But my limited resources did not permit such an

extension of the research which, therefore, limits any generalisations in the conclusions. As such further studies, perhaps a comparative study on London and other regions in the south east of England or, indeed, another capital in the four constituent countries of the UK, would be insightful as it could provide empirical evidence on the issues that the policy implementation created for them.

This is because the issues surrounding the policy implementation are no longer London-centric. The maximum annual welfare benefit has been cut from £26,000 to £20,000 (or £23,000 in London) since I started this research. This change, although under-reported, is seminal – affecting a wider demographic of households across the country. This new tiered benefit cap attempts to account for regional differences in housing costs. The previous single-tier cap had a disproportionate impact on LAs where housing costs are high. This was the case in London districts where capped households were concentrated. The original intention of the poicy was to bring down the housing benefit bill, characterised in the tabloid press as being swallowed up by large families living in expensive homes. But under the new cap, average-sized families, living in average homes across the country, have now been hit and some badly. With this new two-tier benefit cap, the number of affected households will more than double in all regions bar London, meaning affected households will be more evenly distributed across the country. Significantly for the ongoing relevance of this research, emerging qualitative evidence from in-depth interviews conducted in 25 LAs across England into the management and delivery of DHPs found contrasts in the different LAs' management and delivery of welfare reform-related policies (DWP, 2017).

Furthermore, research participants' accounts and perceptions were influenced, not only by their job roles, but also by their personal background and experience. Related to this caveat is the possibility of bias in the data collection as I interviewed some of my

former work colleagues. However, I had declared the work relationships in earlier sections of this thesis and, more importantly, the quality of their contributions, which were similar across the sample, suggests that they were honest with their views.

There were two things I would have done differently though if I were to design the research again. Firstly, I would include first-hand evidence, e.g. observation techniques, rather than relying solely on research participants' narratives as implementation 'evidence', even though, admittedly, negotiating access could be extremely difficult, as I found in this research. Although there was no reason to distrust the research participants' statements, personally observing interactions, especially at the street level, could have led me to draw different conclusions. Secondly, I would not include research participants who withhold their consent to be tape-recorded during their interviews, owing to the limited value of the information shared by the research participant who refused such consent, as I was unable to record our conversation for future analytical use. Although I engaged in useful conversation with the research participant (which helped me to analyse the data), manually recording the information at the same time proved very difficult. Therefore, even though the interview notes were reflective of her views, they were not reliable, and I certainly could not extract quotes from them for use in the analysis.

9.4. Implications of the study

The implications of this study are to extend practical and scholarly research boundaries. The study has not only advanced theoretical knowledge but has also contributed to the evidence regarding service provision and policy effectiveness, although its potential to add to our understanding of housing market solutions is less clear. Through adopting a broader interpretation of policy practice, to include street- and mid-level bureaucracies, which expanded the discretionary territory, new insights into the contextual nature of the policy implementation were made that reveal the

complexity of policy practice as a phenomenon and focus of study. The study, thus, deepened the conceptual understanding of the policy and its practice, particularly the degree to which Lipsky's (1980) theory on street-level bureaucracy remains relevant in an era of hollowed-out government. This study confirmed that the characteristics proposed by Lipsky continue to play a critical role in policy practice.

9.4.1. Theoretical implications

This section returns to the issue of theory to set out what the research uncovered, taking the viewpoint that theory can be a useful way of locating ideas or explaining a phenomenon better, especially as housing is a complex field. Thus, this study did not seek to prove (or disprove) any theory. Conducting this research within the context of dwindling resources but onerous obligations, as well as an ambiguous policy environment, provided the space for theoretical propositions to understand how local housing professionals navigated all the policies to provide a service.

a) <u>Welfare Conditionality</u>

The welfare system in Britain has always been based on the conditional principle that productive citizens would pool their resources and would be guaranteed comprehensive rights to financial entitlements in times of need (Dwyer and Wright, 2014; Marshall, 1950). This emphasis on collective responsibility and solidarity was what the welfare reform programme sought to reinforce. Within this behavioural context, the current welfare reform programme revitalised the requirements of conditionality. However, the policy direction is problematic as any failure to conform is placed on the individual who is blamed for the adverse life situations they experience, with less regard for factors such as personal impairments and health problems; wider structural problems such as the constraints in labour market e.g. zero-hour contracts, low pay; and a

disregard for responsibilities to others e.g. the care needs of family members (Dwyer and Wright, 2014).

Whilst supporters of the reform applaud the government's focus on reducing the national debt by reducing public expenditure, the argument about welfare dependency being only applicable to the unemployed is not borne out by the facts as an increasing number of benefit recipients are in work. For those who are unemployed, the research participants believed that their circumstances did not permit them to take up available employment, so they may be granted long-term financial support from the DHP grant. For those benefit recipients who have complied with the policy, their jobs were also found to be incapable of alleviating their poverty as the jobs are low-paid (Dean, 2012), and the incentive of Working Tax Credits 'cannot compensate for the injustices or adverse effects of the precarious labour market' (p.358).

Besides, to be successful in being awarded a DHP grant, applicants must abide by the individualised obligations that the housing professionals have set for them such as fulfilment of jobsearch requirements or workshop attendance for skills development or household budget adjustments. Within this regime, applicants are managed and monitored and instructed to take specific action (e.g. cut down expenditure on non-essential items) that would help them find work or prevent their homelessness. This suggests that officers can 'correct' individual behaviour and, where this does not materialise, sanction is threatened or applied.

Nevertheless, there were different levels of conditionality based on applicants perceived ability and readiness to work. For example, those with older children face the full conditionality whilst those applicants, who have been deemed not ill enough to qualify for PIP, are assisted with longer-term financial support. In such scenarios, Fletcher and Wright (2017), citing Rodger (2008), have argued that behavioural conditionality appears

to be linked to moves to criminalise social policy, that is, 'redefining the aims and objectives of the welfare system, and in the process abandoning concerns for meeting human needs in favour of maintaining a disciplined and orderly society' (p.3).

Conditionality in homelessness provision was also prevalent especially as LAs use the law and regulations differently to provide such services which is regarded as a 'gift' to the applicants, even though the law says this 'gift' should be given unconditionally to certain groups of people who meet all the eligibility criteria (e.g. parents with dependent children). This conditional approach to homelessness provision was geared towards disciplining the applicants, as deviant individuals, rather than meeting their basic needs as homeless people (Scanlon and Adlam, 2008). The disciplining tactic embedded in the modes of housing provision to correct the applicants' individual irresponsibility for failing to become workers, is aimed at forcing them 'to get with the programme' and to integrate into 'mainstream' society by complying with the conditions for receiving statutorily-funded support' (Dwyer et al, 2014:19).

The practical importance of the LAs attaching conditions to the receipt of DHP awards, or for accommodation placement within their districts, has had an impact on the applicants' 'willingness to engage with the services available' (Dwyer et al, 2014). Out of district accommodation placements represents what Tosi (2007) has regarded as a 'new paradigm shift that subtracts the question of homelessness from integration policies, to reduce homelessness provision to a principle of order, making it no longer a welfare policy issue' (p.233). Evidence from the research suggests that some applicants 'voted with their feet' and abandoned unsuitable accommodation that did not meet theirs or their families' needs. Applicants also failed to engage with the housing professionals where there was suspicion that their situation was not considered holistically, including family obligations, in any assessment that is made, only their own

266

individual ability or capability. Thus, conditionality is not a panacea for welfare dependency.

The ways in which cap-affected people are supported (or in some cases, not supported) should, therefore, include the appropriateness of conditional interventionist methods. For example, those recipients embarking on self-employment should be properly supported to build up their businesses and be assured of support throughout their enterprise. Such support will see a reduction in pseudo-employment and such fraudulent claims for exemptions and give applicants the flexibility they are seeking to comply with the policy and care for their families at the same time. Such measures can benefit the applicants greatly but, of course, the whole aim of the programme is cutting costs to the Treasury. Therefore, investing in this kind of support, which will involve a large initial outlay, is an anathema to the government's reform agenda. Moreover, take up from such investment may be highly unpredictable.

b) **Governance and Street-Level Bureaucracy**

Michael Lipsky's (1980) insights into 'street-level bureaucrats' and their discretion in the public policy process provided a justification for my methodological focus on frontline workers. However, since Lipsky's analysis, local government in England has been the subject of extensive reforms that have eroded traditional governance structures. My empirical findings about contemporary frontline work in LAs both reinforce and present a challenge to his seminal characterisation of the 'street-level bureaucrat'.

First, the findings of this study reinforce Lipsky's (1980) objection to political science's traditional 'top-down' analyses of policy making, which tended to view the political system as demarcated between policy and administration, and where the role of the administrator is to merely carry out policy formulated by decision makers. Lipsky

responded to these analyses with a 'bottom-up' argument, asserting that 'policy making does not simply end once a policy is set out' (Lipsky, 1980, p. x). Thus, the empirical findings of this study reinforce Lipsky's account of the significant contribution of 'street-level bureaucrats' to policy making.

Second, Maynard-Moody and Musheno (2003) have criticised Lipsky's concept of a 'street-level bureaucrat' as one which 'is incomplete and distorts our understanding of governing on the frontlines. Maynard-Moody and Musheno (2000) argue that the central tenets of Lipsky's definition – 'hierarchy', 'legitimacy', 'implementation' and 'discretion' (p. 329) – have little currency in the current institutional culture of street-level workers. Maynard-Moody and Musheno (2000; 2003) instead argue that frontline work today is defined by relationships between citizens and street-level officials. So, while Lipsky's (1976) exposition of frontline discretion highlighted a number of techniques that frontline workers used in their everyday work in the implementation of the benefit cap policy, these 'techniques' have been broadened out to include 'strategies' that are less about reducing frontline work to procedural bureaucratic formats and more about building longer-term relationships with applicants. This reconstituted role for frontline workers requires Lipsky's notion of 'street-level bureaucracy' to be revised in a contemporary local governance setting. On the positive side, it gives the possibility of innovation to tackle the so-called 'wicked' problems – such as homelessness – that are faced by local governments and the public sector more widely. Yet such capacity to innovate may arguably only be small scale and fragmented.

The findings of this study have implications for the governance of housing and other ancillary benefits. In particular, bureaucratic structure and silo working arrangements can strongly impact the behaviour of implementation actors. In this study, DWP is hierarchically superior to local authorities and the delegated relationship between the two agencies, especially the Housing Benefit (HB) departments within local

authorities, is governed purely by administrative regulations drawn up by the DWP. In turn, and from the perspective of local implementation, these administrative regulations appear to grant the HB department higher authority over the local housing authority since HB department can delegate DHP distribution to the local housing authority and still evaluate their performance. However, HB department conceives the inter-departmental relationship as a partnership, which may or may not be effective.

Taken together, the findings from this research provide a complex assessment of how social policies, such as the benefit cap policy, are put into practice at the street level than the governance literature suggests. Although a divergence in the implementation was expected, due to local political cultures and other organisational factors, the differences in administrative allocation of resources were put down to the relative affluence of the LAs, which then raised fairness and equity questions. Thus, as situated agents, the research participants did what they could rather than what they had to do as professional housing officials. Therefore, the research participants could not use their 'professional' autonomy to determine and 'treat' all the needs of the applicants. These findings, thus, separate Lipsky's (1980) ideas on frontline, applicant-focused discretion, which is associated with occupational professionalism, from organisational professionalism, which relates to governance and performance management practices.

This research adds to our understanding of higher-level influences upon frontline decision-making. This is because the strategic direction and attention that senior management gives to the policy implementation had the greatest influence on frontline work. Senior managers too were more willing to go against regulations and case law when it was clear that the local politicians 'endorsed that divergence' (May and Winter, 2007:469). This shows that local politicians had some influence on the use of discretion at the mid- and street-levels. The implication of this assessment is that the support of

local politicians and senior management in policy implementation helps to reduce uncertainty about appropriate behaviours at the street level.

The exercise of discretion was linked to the stereotypical categorisation of the applicants which is allied to Lipsky's (2010) contention that such discretion is inevitable, and the style and level of research participant discretion is influenced by the applicants themselves. All things considered, the inflexibility of stereotypes and their associations with positive or negative categorisation was influenced by research participants' experiences and, sometimes, particular applicants' behaviours. This kind of assessment and decision-making goes against the grain of the basic principles of equal access and fairness, even in the face of applicant eligibility for housing assistance. The potential consequences of unequal treatment for some applicants may thus lead to adverse life experiences for them and their family.

This calls into question Lipsky's theory on discretion as it does not consider professionalism or 'justiciable rights', only individuals' position in the implementation hierarchy within the organisation and the amount of discretion that they possess. As such, Evans (2010) has argued that the level of frontline discretion is as much based on professional (as in legal) determinants as on one's position in the organisation. There are also important issues of equity. It was clear that applicants received very different treatments in the different LAs, or even within the same LA, to 'solve' their housing problems. However, not all of these differences in treatment are justifiable. For example, there were significant differences in implementation decisions and resource allocations between social and private tenants, differences that were attributed to 'luck' – of having one tenancy (social) as opposed to another (private). These differences were found to affect the quality of services and equity of signals provided to the applicants. Therefore, central government must put more effort into addressing the postcode lottery that

emerged in the study. This reality also suggests that the deterrent effect of the policy sanctions and the amounts saved in the welfare bill (if any) are unquantifiable, especially as there is no change in the performance of statutory housing obligations. Instead, it is the composition of welfare expenditure that has changed along with the conditions of receipt (Beland cited in Carney, 2007).

Furthermore, disclosure, or accountability of implementation outcomes, was found to be an issue. Although performance measurement data are returned to central government on a regular basis about case compositions and 'resolutions', there is still a lot of information missing on how applicants are 'treated' in the spaces between the application of the cap, their approach for housing assistance and the prevention of their homelessness or the acceptance of a homeless duty. These local and individual decisions have consequences, owing to the interpretations given to the policy by the LA senior management teams and other housing professionals. As a result, routine checks and balances, not only judicial oversight, is required to address questions of accountability. For as already indicated, the implementation of the policy by LAs, with all its complexities and messiness, reflects the values of central government and checks are needed on the exercise of power without undermining the basic purposes of reforms.

In terms of wider theoretical implications, this study's contribution to the socio-legal literature centres around the question of 'legal compliance' (Hunter *et al*, 2016) to highlight the reasons why public bodies like LAs fail to comply, not only with legislative rules, but also with the guidance of the courts and case law, given that their organisational abilities and capabilities to meet the requirements of the law are circumscribed by factors beyond their control. This finding illustrates that LAs' everyday activities are affected by the resources they have available for implementing the law, which then allows them to (re)create and legitimate the new socio-spatial order in housing provision.

This study has further revealed that the policy's attempts to use the administrative rules of the welfare benefits distribution system (e.g. housing benefit administration) or, indeed, the eventual deprivation of suitable housing as mechanisms for behaviour change, was unlikely to meet its stated objectives. Governments' attempts to reconfigure the welfare system will need to consider the complex ways in which the moral and legal significance of citizenship is socially-constructed and popularly understood, to include rights to welfare assistance. Whilst incentives are offered as 'bribes' to welfare recipients in return for their change in behaviour, their effectiveness will depend on the extent to which they (recipients) buy into the values and beliefs of the policymakers. Still, it can neither be assumed that all recipients will accept the offer of incentive nor that the welfare reforms should proceed unhindered, in spite of its shortcomings. Neither is it helpful 'to base the welfare benefit system on the Hobbesian assumption that all benefit claimants are venal, calculating and self-interested' (Dean, 1998:10).

Finally, the research findings point to the unequivocal and urgent need for theoretical attention towards ethnicity, gender and lone parenthood. Women's reproductive patterns were implicated in this study in multiple ways to portray difference. This discriminatory framing of benefit-dependent women, expressed in paternalistic and moralistic language, was in recognition that women are mostly the carers of young children and so are the group most prone to unemployment. Whilst these differences were subsumed in research participants' discourses, it was more explicit in policymakers' narratives and justifications for the policy formation. Therefore, theoretical attention needs to be paid to the processes of 'othering' that supports a more one-sided interpretation of the welfare reform which portrays the female lone parent (ethnic minority or otherwise) as irresponsible for producing several, 'fatherless' children that she could not afford to raise independently. This demeaning stereotype

has been fostered regardless of the welfare recipients' history that could include domestic abuse, bereavement or unforeseen disability within the family.

9.4.2. Implications for policy and practice

What is going wrong? What might be done better? This study has underlined how thinking on welfare state provision has been transformed, with LAs cast as more than just a place where welfare recipients receive housing advice and assistance but also now being re-imagined as one-stop-shops, or local focal point, where local (homeless) people would expect all their needs to be met. A conclusion that can be drawn from the research findings and analysis is that, given the centralised nature of social policy in England, any resolution to the problem of incompatibility that was identified in this study lies mainly with the executive and legislative branches of government. This is because housing professionals can only implement social policies as best they can and, in cases where applicants agitate the assertion of their rights, the judiciary only interpret the existing law, not change or advocate for change.

The most striking implication that emerged from the research was whether the LAs could cope with subsidising homeless benefit-capped applicants, indefinitely and without government assistance, in light of housing scarcity and the continued problem of affordability. This question cannot be answered definitively but the findings indicate that local politicians and housing professionals will continue to face more pressures in providing housing assistance to local people. Housing provision might also continue to be provided according to applicants' postcodes and in more unequal ways, generally, given that research participants seem to be, primarily, guided less by need and more by their own judgement according to the resources available. This phenomenon threatens one of the most significant tenets of public administration law, that is, that similar cases should be treated in similar ways. Yet, it could be argued that the diversity of human needs makes judgement calls by SLBs necessary. Therefore, SLBs would need autonomy

to use their experience and knowledge more effectively in their work. This suggestion is made in recognition that, in this era of decreased housing affordability and increased poverty, reliance on the LAs for homeless assistance will be most acute, owing to the homelessness law's popularity among many poor people, who see it as their first option (rather than as a last resort) in instances of housing pressures.

Consequently, in developing welfare and housing policy that is fit for purpose, effective frameworks and interventions are needed that draw on precedence and forecasting, especially the impact they would have on implementing agencies, such as LAs, as well as a consideration of other structural factors such as funding for social housing and the level of the statutory minimum wage. If these were not considered, or indeed were but policymakers still pressed ahead with the reforms, then one only need to conclude that the policy was not an enabling one but a punitive and divisive instrument in an already-unequal society.

The research topic is also of importance to policymakers, LA senior management and welfare rights campaigners who advocate for better social protection for families with children. The conclusions drawn have the potential to influence strategies for future policy implementation work. The research has particular value for LA leadership, given that the study population concentrated on experienced housing professionals who, on average, had worked in the profession for about 15 years and have witnessed the dramatic impact of the policy on LAs. The distinctive articulations of the policy implementation experiences and reflections that the housing professionals provided would also be of potential value to civil servants whose sole aim appeared to be the policy development and not how it will be practiced at the local level. Research of this kind that provides empirical evidence ought to be taken seriously to make informed choices in the development and formulation of policy.

The housing profession is changing so it is vital that employers continue to invest in training, education and support for their staff. There is a need to promote a more positive profile of housing professionals to promote housing as a career and the role they play in local communities. Housing employers such as LAs would benefit from more detailed understanding of the competencies required for frontline job roles and better matching of candidates into these roles. Senior housing managers and executives would also benefit from greater exposure to day-to-day practice to improve their understanding of the pressures faced by those on the frontline.

9.5. Future research

This study has offered insights from three LAs in London and has clearly demonstrated the conflict that arises between central government's goal of cost cutting through sanctioning technologies of control (coercion and inducements) and local governments' goals (or rather obligations) of providing statutory housing assistance to local people, which includes substantial subsidisation of the full costs of the accommodation provided. Therefore, the conflicting goals of central and local governments have influenced the type of service provided at the street level which emerged from this study.

The analysis has also demonstrated how several factors have contributed to a disjointed output in the policy's implementation within the three LAs. However, in future, it will be more productive to explore the practices of all LAs in London, through a large-scale study, as very little research on this dynamic phenomenon exists. And, as this research was predominantly concerned with research participants' perceptions and practices, any such future undertaking would benefit from the inclusion of housing providers to examine their roles and willingness levels within the implementation structure. This might help to explain the significance of resources, and of the economic

implications for both LAs and housing providers. As the effects of the policy evolve, the importance of implementation networks should form a prominent angle for research.

In comparison with other social policy studies, this study did not set out to examine research participants' legal consciousness, but it would seem to warrant a proper examination of the everyday experiences of the research participants and their engagement with the law (Cowan, 2004). Moreover, as the argument was pitched at the level of conflict between social welfare and homelessness law, the suggestion is that bureaucratic practices were necessarily determinative of a legal consciousness narrative. Therefore, future research could focus on uncovering the situated events and interactions of research participants through their narratives and actions that may reveal further contradictory discourses.

Finally, future research could focus on emerging policies aimed at directly and deliberately regulating applicants' conducts. For example, recent policy developments such as child benefit and tax credit caps, that restricted welfare benefits to the two eldest children in a family, are cases in point as these would also have a direct impact on applicants' housing benefit entitlements which in turn will affect applicants' housing stability. Such research could examine how the applicants are regulated and the types of resistance (if any) they adopted. To gain a complete understanding of the policies' implementation, future researchers may incorporate any new and dynamic protest behaviours into their analyses (e.g. splitting large families between parents to maintain their maximum welfare benefits), alongside the usual forms of resistance (voice, legal action and exit) that predominate. These strategies, if found to be prevalent, may generate change in the policy governance.

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Appendices

Appendix 1 – List of Changes to Welfare Benefit System under the Coalition Government

Time	Changes in Benefits	Estimate of people affected	Average amount of benefit loss
April 2011	The maximum amount of Local Housing Allowance (LHA) for private rented sector available was capped at £250 per week for a one bedroom rising to £400 for a four-bedroom property. Five-bedroom rates abolished. The cap applies to existing and new claimants.	21,000 households in Great Britain were affected by this change in LHA benefit (around 2 per cent of LHA claimants). 80 per cent of the total affected lived in London.	Estimated that those affected lost on average £74 per week.
April 2011	Caps on the amount of LHA available were set at the 30th percentile rather than the median of local private rent levels. This means that only the bottom 30 per cent of private rent properties in each area are accessible to benefit dependent claimants.	775,000 households were affected by the LHA benefit cut (around 83 per cent of LHA claimants)	Estimated that those affected lost on average £9 per week. Larger households may have experienced greater losses.
April 2011	The percentage of childcare costs eligible to be paid through tax credits was reduced from 80% to 70%.	On 1 April 2011, 490,000 in-work parents were benefiting from the childcare element of working tax credit. In 2012 the number was down to 429,800. This was the first time ever, since tax credits were introduced in 2003, that this number had fallen.	The maximum loss that a working parent with more than 1 child faced was around £30pw (or £1,560 per year). On average, the amount of childcare costs covered by tax credits was £69 per week in April 2011; it fell to £59 per week in December 2012
April 2011	The *baby* element of child tax credit was abolished.	470,000 families were claiming this element on 1st April 2011.	The *baby* element amounted to £10.50 per week (£545 annually)
April 2012	Couples with dependent children have to work 24 hours a week between them, (with one working at least 16) to qualify for Working Tax Credit. Previously only one adult had to work at least 16 hours per week to qualify.	A total of 212,000 families containing 470,000 children were affected.	Maximum loss was around £75 per week (£3,900 annually)

List of Changes to Welfare Benefit System under the Coalition Government (Cont'd)

May 2012	For the purposes of qualifying for income support as a lone parent, the age of claimants' youngest child decreased to 5 years from 7 years. Workless lone parents will instead have to apply for JSA.	Over 150,000 lone parents with children aged 5+ were claiming Income Support	Not applicable
April 2013	Working-age claimants of Housing Benefit (HB) in the social rented sector who were under-occupying their homes had their benefits cut to an amount that reflected the size of their household rather than the size of their home.	At the time of its introduction in 2013/14, this so-called 'bedroom tax' was expected to affect an estimated 660,000 HB claimants living in the social rented sector.	Average loss for local authority tenants was expected to be £13 per week in 2013/14, compared to £16 per week for housing association tenants
April 2013	LHA rates were increased in line with the Consumer Prices Index (CPI) rather than in line with market rents.	It was estimated that there would be around 1.4 million claimants under the new Local Housing Allowance arrangements in 2013.	It was expected that LHA claimants will experience a notional loss in their benefit based on historical trends in rent growth, and forecasts of the Consumer Price Index.
April 2013	Council Tax Support was replaced by locally-devised Council Tax Support schemes. Pensioners are protected from the change.	An estimated 2.4 million Council Tax Benefit claimants lost out.	The average increase in council tax was £138 in 2013-14, though one million households faced a less than £100 increase and 150,000 faced a £300 increase.
April 2013	Abolition of the discretionary Social Fund, which included Community Care Grants and Crisis Loans that was mainly accessed by the low-paid and unemployed people for emergency purchases or to start their lives afresh.	In 2009/10 over 263,000 non-refundable Community Care Grants were awarded, with the average initial award being £437. In 2009/10, around 2.7 million Crisis Loans were awarded to help people deal with emergencies.	In 2009/10, the average award of crisis loan was £82.
April 2013	For three years (2013-14, 2014-15, 2015-16) certain benefits were uprated by 1% a year, rather than CPI.	9.6 million households were expected to be affected by lower than inflation increases.	The average loss was £3 per week.
April 2013	No working age, unemployed parent with dependent children could receive more than £500 per week in total welfare benefits (or £350 for single adult households).	40,000 households were expected to be affected.	The average loss for those affected was £93 per week.

Appendix 2

<u>**Interview Schedule – Assistant Director/Housing Needs Manager/Operations Manager**</u>

(START WITH INTRODUCTION SHEET)

Part 1 - Paternalism		
QUESTIONS	**PROBES**	**NOTES**
How do you see your role in implementing the benefit cap policy?	What specifically do you mean by…?	
A major purpose of welfare reform policies, such as the benefit cap policy that target the so-called undeserving poor, is to affirm dominant moral beliefs about work ethic, family structure, self-sufficiency etc. How does your work reinforce these moral values?	Can you tell be a bit more...?	
Part of the government rhetoric is that people in employment would move to accommodation that they can afford and benefit claimants should do the same. What are your views on this notion in relation to the housing choices of welfare benefit recipients?	In your opinion are they viable options?	

Part 2 – Welfare Conditionality: social control through sanctions		
QUESTIONS	**PROBES**	**NOTES**
For those applicants who are the target of the benefit cap policy what level of help and support does the council offer them?	e.g. ICT (digital inclusion), childcare, language skills, budget and financial management, developing work support services, identifying vulnerable clients.	
The benefit cap policy has the potential to put pressure on homelessness provision, housing options and procurement of accommodation. What, if any, are the innovative ways that the council has developed to meet its statutory housing obligations towards benefit-capped, unintentionally homeless applicants and their families?	Such as? How does the council discharge its Section 213 housing duties where household benefits are capped and applicants are not entitled to the full local housing allowance?	
With total household benefits set to reduce to £23,000 (down from the current £26,000) per annum later in the year, how would the council respond to the potential increase in homelessness?		

Part 3 – Governance: Translating powers and responsibilities into action		
QUESTIONS	**PROBES**	**NOTES**
What preparations did the council make before the benefit cap policy commenced?	Did the council draw up a policy to implement the reforms or was it business as usual but with the requirements of the benefit cap policy in mind? What factors influenced the choices the council made when preparing to implement the policy?	
What are the management and governance arrangements for the implementation of the benefit cap policy?	Have relationships with existing stakeholders (that is, private and social landlords, contractors, DWP) changed as a result of the benefit cap policy? What other partnership arrangements are in place? (e.g. CAB, Money Advice, employment agencies, credit union)	
Does the council have any strategic response, policies or future planning to minimise the effects of the benefits cap policy on the local population?	What strategic choices about customer needs has the council made to maintain fairness? Would you say you are performing an employment role too?	

In your experience what then are the tensions (or contradictions) between the benefit cap policy, the various statutes on housing and homelessness (Housing Act 1996 and Localism Act 2011) and, crucially, various landmark caselaw?	By that I mean, how do you resolve the dilemma facing the council, for example, reconciling the homelessness law and the financial constraints that the benefit cap imposes on applicants' ability to afford suitable accommodation?	
In a market economy like ours where price is determined by supply and demand, how do you compete with more affluent London councils that can afford the prices being asked for the scarce housing resources available?	Is there evidence of any opportunistic behaviour from private contractors in terms of price for available housing? Have you set up any strategic partnerships with other neighbouring councils to set out behavioural expectations in sourcing accommodation within each other's boundaries?	

Part 4 - Discretion: Workers' adaptations to conditions of work

QUESTIONS	PROBES	NOTES
Councils can use the DHP fund as they see fit and most use it to prevent homelessness and so temporarily keep housing evictions down. Given that the DHP funding to LAs is only transitional and has been cut from £165m in 2014/15 to 125m in 2015/16, how will the council cope with the reduced budget?	With total household benefits set to reduce to £23,000 per annum from £26,000 later this year, how do you think the service will cope with the potential increase in service requests?	

How do you determine equality in housing provision if some people are placed within borough and others are not?	What strategic choices about services has the council made to maintain fairness?	
Part 5 - Demographics We are almost done, but before we go, please give me a brief description of your job role, including your title.	**Part 6 - Wrap up Questions** 1. Do you have anything to add? 2. Is there anything I should have asked? 3. How was your experience of the interview? 4. Would you like to see a summary of the results?	**[PROVIDE CONTACT CARD TO THE PARTICIPANTS IN CASE THEY NEED/ WANT TO DISCUSS FURTHER ISSUES.]** That is all the questions I have. I really want to thank you for agreeing to take part in the study and for talking to me today. Thank you again for your help.

Appendix 3

Interview Schedule – TA Procurement Manager

(START WITH INTRODUCTION SHEET)

Part 1 – Governance: Translating powers and responsibilities into action		
QUESTIONS	**PROBES**	**NOTES**
What has been the impact of the benefit cap policy on your role within the housing department?	Given the scale of the reforms and the potential impact on LAs, what, in your view, are the costs to the council? E.g. financial, reputational? What are your frustrations with the benefit cap for your job?	
Has the publicity surrounding the benefit cap policy brought about a change in the attitudes or behaviours of private landlords?	Has the council entered into any strategic partnerships with other neighbouring councils such as setting out behavioural expectations in sourcing accommodation within each other's boundaries?	
How do you procure accommodation to meet the needs of homeless applicants who were evicted as a result of the reduction in their incomes due to benefit cap?		

The benefit cap policy has the potential to put pressure on homelessness provision, housing options and procurement of accommodation. What, if any, are the innovative ways that the council has developed to meet its statutory housing obligations towards benefit-capped, unintentionally homeless families?	Has the council got the capacity and resources to meet the predicted increase in homelessness caused by the benefit cap policy? How is the service coping as there is so much fluidity and uncertainty in the amount of footfall for service requests?	
As you know, the provision of TA is (partly) funded through housing benefit or local housing allowance. Given that it is this element that is adjusted in the benefit cap implementation, how does the council afford the cumulative shortfall in accommodation charges for those homeless applicants who are benefit-capped?	With total household benefits set to be reduced to £23,000 (down from the current £26,000) per annum later this year, how would the council respond to the even greater potential increase in homelessness? What do you think are the opportunities and constraints of the benefit cap for your job role?	
How viable is the local private rental market? Is there evidence of any opportunistic behaviour from private contractors in terms of price for available housing?	Are there any homes within the borough that are within the local housing allowance rate for benefit capped households to take up?	

Part 2 – Paternalism: Freedom and Autonomy		
QUESTIONS	**PROBES**	**NOTES**
Do homeless applicants have a say in where they are accommodated?	What specifically do you mean by…?	
What do you consider to be suitable accommodation for benefit-capped, homeless applicants?	What is the reaction of applicants to the accommodation choices that are given to them? E.g. out of borough, B&B, hostels?	
A major purpose of welfare reform policies, such as the benefit cap policy that target the so-called undeserving poor, is to affirm dominant moral beliefs about work ethic, family structure, self-sufficiency etc. How does your work reinforce these moral values?		
Part of the government rhetoric is that people in employment should move to accommodation that they can afford and benefit claimants should do the same. What are your views on this notion in relation to the housing choices of benefit-capped homeless applicants?	In your opinion are they viable options?	

Part 3 - Discretion: Workers' adaptations to conditions of work		
QUESTIONS	**PROBES**	**NOTES**
Discretion is inherent in all aspects of public administration. What level of latitude (if any) are you given to interpret the accommodation rules when placing benefit-capped families in TA?	What factors influence the way you exercise such discretion?	
Part 5 - Demographics We are almost done, but before we go, please give me a brief description of your job role, including your title.	**Part 6 - Wrap up Questions** 1. Do you have anything to add? 2. Is there anything I should have asked? 3. How was your experience of the interview? 4. Would you like to see a summary of the results?	**[PROVIDE CONTACT CARD TO THE PARTICIPANTS IN CASE THEY NEED/ WANT TO DISCUSS FURTHER ISSUES.]** That is all the questions I have. I really want to thank you for agreeing to take part in the study and for talking to me today. Thank you again for your help.

Appendix 4

Interview Schedule – Housing Benefits Manager

(START WITH INTRODUCTION SHEET)

Part 1 – Governance: Translating powers and responsibilities into action		
QUESTIONS	**PROBES**	**NOTES**
How proactive has the council been in implementing the benefit cap policy?	What, if any, are the difficulties you face in your job to meet the intentions of the benefit cap policy?	
What do you think are the main opportunities (if any) that have emerged from the welfare reforms for your job role?	Given the scale of the reforms, what do you think is the potential impact on LAs?	
Tell me about the local private housing market in terms of rent affordability and availability.	Are there any homes within the district that are within the local housing allowance rate?	
Councils can use the DHP fund as they see fit and most use it to prevent homelessness and so keep housing evictions down. Given that the DHP funding to local authorities is only transitional and has been cut from £165m in 2014/15 to £125m in 2015/16, how will the council cope with the reduced budget?	With total household benefits set to reduce to £23,000 later in the year, from the current £26,000, how will the service cope with the potential increase in service requests?	

Part 2 – Paternalism: Freedom and Autonomy		
QUESTIONS	**PROBES**	**NOTES**
A major purpose of welfare reform policies, such as the benefit cap policy that target the so-called undeserving poor, is to affirm dominant moral beliefs about work ethic, family structure, self-sufficiency etc. How does your work reinforce these moral values?	What, in your experience, is the role of housing Benefit or local housing allowance?	
Conducting financial assessment of applicants' weekly/ monthly income and expenditure is viewed by social scientists as a social control function, geared towards controlling applicants' lifestyles. What is your response?		
Part 3 – Welfare Conditionality: social control through sanctions		
QUESTIONS	**PROBES**	**NOTES**
Restricting welfare benefits, especially housing benefit, is intended to make people change their behaviour and develop a work ethic. In your experience, how effective has it been with regard to welfare-dependent applicants?	In your experience do some welfare benefit claimants make a career out of claiming benefits?	

The government wants to make work pay and use work as a route out of poverty. What evidence do you see of this in your work?	In other words, since the policy adopts a causal relationship, that is, lack of work ethic as cause of welfare dependency, are those who find work more self-sufficient and better able to afford their accommodation?	

Part 4 - Discretion: Workers' adaptations to conditions of work

QUESTIONS	PROBES	NOTES
Discretion is inherent in all aspects of public administration. What factors (indeed what circumstances) influence the way you exercise discretion in applying the benefit cap?	What latitude (if any) are you given to interpret the rules and apply the award criteria when assessing DHP applications?	
How does the council use its DHP budget?	What criteria do you use to assess DHP applications to prevent homelessness of those who have had their benefits capped?	
What is the average length of time that DHP awards are made to the applicants?	Does the budget last the whole financial year? What is the organisational strategy for utilising any surplus funds before the financial year ends?	
Your job inevitably involves rationing of financial resources, enforcing eligibility requirements, and monitoring compliance. How do you do these effectively and equitably?		

Part 5 - Demographics	Part 6 - Wrap up Questions	**[PROVIDE CONTACT CARD TO THE PARTICIPANTS IN CASE THEY NEED/ WANT TO DISCUSS FURTHER ISSUES.]**
We are almost done, but before we go, please give me a brief description of your job role, including your title.	1. Do you have anything to add? 2. Is there anything I should have asked? 3. How was your experience of the interview? 4. Would you like to see a summary of the results?	That is all the questions I have. I really want to thank you for agreeing to take part in the study and for talking to me today. Thank you again for your help.

Appendix 5

<u>**Interview Schedule – Accommodation Manager/Housing Options Manager/Housing Options Officer**</u>

(START WITH INTRODUCTION SHEET)

Part 1 – Welfare Conditionality: social control through sanctions		
QUESTIONS	**PROBES**	**NOTES**
Take me through a typical encounter with a benefit-capped homeless applicant, from inception of case to its closure.	What is the rate of homelessness due to benefit-capped evictions? Can you tell me a bit more about that…?	
What level of support does the council offer to benefit-capped applicants who are homeless or threatened with homelessness to comply with the benefit cap policy?	E.g. ICT (digital inclusion), childcare, language skills, budget and financial management, developing work support services, identifying vulnerable cases.	
The benefit cap policy adopts a causal relationship, that is, lack of work ethic as cause of welfare dependency. Do you see any evidence that those who find work are more self-sufficient and better able to afford their own accommodation?	In your experience do some homeless applicants make a career out of claiming benefits?	
Part 2 – Governance: Translating powers and responsibilities through to action		
QUESTIONS	**PROBES**	**NOTES**
Part of the government rhetoric is that people in employment should move to accommodation that they can afford and benefit claimants should do the same. What are your views on this notion in relation to the housing choices of welfare benefit recipients?	How have your interactions with benefit-capped, homeless applicants changed since the inception of the benefit cap?	

How proactive has the council been in implementing the benefit cap policy?	How is the service coping as there is so much fluidity and uncertainty in the amount of footfall for service requests?	
What are the housing options that you give to benefit-capped households who have been dispossessed of their accommodation due to affordability issues?	In your opinion are they viable options?	
The benefit cap policy has the potential to put pressure on homelessness provision, housing options and procurement of accommodation. What, if any, are the innovative ways that the council has developed to meet its statutory housing obligations towards benefit-capped, unintentionally homeless families?	Such as? How does the council discharge its Section 213 housing duties where household benefits are capped and applicants are not entitled to the full local housing allowance?	
With total household benefits set to be reduced to £23,000 (down from the current £26,000) per annum later this year, how would the council respond to the potential increase in homelessness?	In your experience, what then are the tensions (or contradictions) between the benefit cap policy, the various statutes on housing and homelessness (Housing Act 1996 and Localism Act 2011) and, crucially, various landmark caselaw?	
With local authorities and their partners picking up the service demand brought about by the benefit cap policy what would you say is the future of the early intervention, prevention model of homelessness, especially as the private rented sector has become increasingly unaffordable to many benefit claimants?	Is there a future for this model?	

Part 3 – Paternalism: Freedom and Autonomy		
QUESTIONS	**PROBES**	**NOTES**
How successful have the (threats of) sanctions been in attaining compliance from benefit-capped, homeless applicants?	Could compliance have been attained in other ways? E.g. through establishing and maintaining trusting relationships with applicants?	
How do you see your role in implementing the benefit cap policy?	As one of social control agent, e.g. by imposing sanctions on homeless applicants, by conducting financial assessment which could be construed as controlling applicants' lifestyles. What is your response?	
When assessing applicants for TA do you take employment location, children's schooling and social networks etc. into account so as not to disrupt family routine by placing out of district?	.	
In your view, what are the values that you are expected to have in your professional role?	Traditionally, the role of housing department is to determine and monitor eligibility (broadly speaking) for housing assistance and provide accommodation. The benefit cap has changed that role and now requires you to encourage applicants to positively change their behaviour and develop a work ethic. How do you do both of these roles without imposing moral judgements on applicants and thereby crowding out your professional values?	

Part 4 - Discretion: Workers' adaptations to conditions of work		
QUESTIONS	**PROBES**	**NOTES**
Councils can use the DHP fund as they see fit and most use it to prevent homelessness and so keep evictions down. Given that the DHP funding to local authorities is only transitional and has been cut from £165m in 2014/15 to £125m in 2015/16, how will the council cope with the reduced budget?	With total household benefits set to be reduced to £23,000 per annum later in the year, how do you think the service will cope with the likely increase in service requests?	
Given the impact of the benefit cap on your job role and limited available resources which puts pressures on the service, what are the coping mechanisms and sets of routines that you have developed to adapt to these changes?	e.g. creaming, rubber stamping, referrals, working overtime, private goal definition, withdrawal/ exit?	
How do you determine equality in housing provision if some benefit-capped applicants are accommodated within district and others are not?	What strategic choices about services has the council made to maintain fairness?	
Part 5 - Demographics We are almost done, but before we go, please give me a brief description of your job role, including your title.	**Part 6 - Wrap up Questions** 1. Do you have anything to add? 2. Is there anything I should have asked? 3. How was your experience of the interview? 4. Would you like to see a summary of the results?	**[PROVIDE CONTACT CARD TO THE PARTICIPANTS IN CASE THEY NEED/ WANT TO DISCUSS FURTHER ISSUES.]** That is all the questions I have. I really want to thank you for agreeing to take part in the study and for talking to me today. Thank you again for your help.

Appendix 6

<u>**Interview Schedule – Senior Income Manager/Welfare Benefits Officer**</u>

(START WITH INTRODUCTION SHEET)

Part 1 – Governance: Translating powers and responsibilities into action		
QUESTIONS	**PROBES**	**NOTES**
What role do you play in the benefit cap policy implementation framework?	How have your interactions with the homeless applicant, especially benefit-capped, changed since the inception of the benefit cap policy (NOT FOR SENIOR INCOME MANAGER)	
What level of support does the council offer to benefit-capped applicants to comply with the policy?	E.g. ICT (digital inclusion), childcare, language skills, budget and financial management, developing work support services.	
How does the council use its DHP budget?		
With total household benefits set to be reduced to £23,000 (down from the current £26,000) per annum later in the year, how would the council respond to the potential increase in requests for homelessness assistance?	What would your advice be to an applicant whose household income has been further reduced, has exhausted their DHP applications and is facing eviction?	

Part 2 – Paternalism: Freedom and Autonomy		
QUESTIONS	**PROBES**	**NOTES**
How do you see your role in implementing the benefit cap policy?	What specifically do you mean by…?	
Conducting financial assessment of applicants' weekly/monthly income and expenditure is viewed by social scientists as a social control function, geared towards controlling applicants' lifestyles. What is your response?	Can I check I've understood what you said properly?	
The restrictions imposed by the benefit cap and their effect on household incomes may give the impression that the applicants are undeserving of welfare assistance. What impact does sanctions have on family life and, indeed, the parents' chances of being gainfully employed?	Do you know of any benefit-capped applicants who have moved out of district, voluntarily, as a result of the cap?	
A major purpose of welfare reform policies, such as the benefit cap policy that target the so-called undeserving poor, is to affirm dominant moral beliefs about work ethic, family structure, self-sufficiency etc. How does your work reinforce these moral values?	In your experience do some unemployed applicants make a career out of claiming benefits?	

Part 3 – Welfare Conditionality: social control through sanctions		
QUESTIONS	**PROBES**	**NOTES**
How successful has the council been in achieving greater compliance with the requirements of the benefit cap from unemployed homeless people with dependent children?	Have any of your cases deliberately refused to work or find work? In this context, is it the role of housing/welfare benefit to force people into work? (NOT FOR SENIOR INCOME MANAGER)	
What is the rate of homelessness due to benefit-capped evictions?	How successful has DHP awards been in preventing the homelessness of benefit-capped households?	
Part 4 - Discretion: Workers' adaptations to conditions of work		
QUESTIONS	**PROBES**	**NOTES**
Discretion is inherent in all aspects of public administration. What factors (indeed what circumstances) influence the way you exercise discretion in assisting households that are affected by the benefit cap?		

What sets of routines or coping mechanisms have you developed for dealing with applicants and to adapt to the changes brought about by the benefit cap policy (creaming, rubber stamping, referrals, working overtime, private goal definition, withdrawal/exit?).	What are the frustrations with the benefit cap policy in your job?	
Part 5 - Demographics We are almost done, but before we go, please give me a brief description of your job role, including your title.	**Part 6 - Wrap up Questions** 1. Do you have anything to add? 2. Is there anything I should have asked? 3. How was your experience of the interview? 4. Would you like to see a summary of the results?	**[PROVIDE CONTACT CARD TO THE PARTICIPANTS IN CASE THEY NEED/ WANT TO DISCUSS FURTHER ISSUES.]** That is all the questions I have. I really want to thank you for agreeing to take part in the study and for talking to me today. Thank you again for your help.

Appendix 7 - Interview **Introduction Sheet**

"*Now we are ready to begin the interview. Before I turn on the tape recorder, I want to remind you not to use any real names during the interview to protect your identity and privacy. I will not be mentioning you by name or the organisation you work for. I might take some notes as you speak in case we have a problem with the recording later. Is that Okay? Here we go.*"

Hello, as you know, my name is Jellina Davies and I am a postgraduate research student at the University of Kent. As I told you in the participant information sheet, I am doing a study on the implementation of the welfare reforms, specifically the benefit cap policy, around housing and homelessness in London. As key housing professionals tasked with implementing the benefit cap policy, it is very important that I hear your views and experiences so that I can get an insight into your day-to-day interaction with benefit-capped, homeless applicants.

To protect your identity, your data will be given a pseudonym, and this will be the only identification for the information you provide today. To ensure that I am able to capture accurate and complete responses, I am proposing to record this interview, with your consent. The recording will be converted into an electronic file and later transcribed. Although you (or your workplace) will not be identified by name, I will include your exact words, in quotes, in the final report. I will keep the electronic file in the university's archives for 3 years after which it will be destroyed.

The information you share with me today is completely confidential and is intended to be used as part of my PhD thesis. It may also be shared with my supervisory team and examining board for academic purposes only.

The interview will be in the form of a guided conversation, facilitated by a list of interview questions. If there is any subject you do not want to talk about, just let me know and I will move on to the next one. Also, if you want me to turn the tape recorder off at any time, just say so and I will respect your wishes. More importantly, I would like you to respond to all questions as fully and honestly as possible, but only to the extent that you feel comfortable in doing so.

Do you give me permission to turn the tape recorder on now? (GET VERBAL CONSENT) The tape recorder is now on. (MAKE THIS STATEMENT AFTER YOU HAVE TURNED THE TAPE RECORDER ON.) Do you have any questions before we begin?

Appendix 8 – Characteristics of Local Authorities in the Sample

Characteristics	Hawkesbury	Lismore	Ryde	London Comparator	England Comparator
Population (2017 Estimate) - approximate	250,000	330,000	305,000	8,835,500	55,609,600
Employment rate (2015) – 16 to 64-year olds	74%	79%	68%	73%	74%
Proportion of the working-age population who claim out-of-work benefits (May 2016) approximate	5.5%	9%	6%	7.7%	8.7%
Percentage of children living in out-of-work benefits household (2015) approximate	9%	18%	10%	14.4%	14%
Rented from Local Authority or Housing Association, (2014) approximate	9%	30%	11%	23%	18%
Rented from Private landlord, (2014) approximate	25%	35%	24%	27%	18%
% of population from BAME groups (2013) approximate	62%	42%	63%	42.5%	N/A
Political control	Labour	Labour	Labour	Labour	Conservative

Source: http://data.london.gov.uk/dataset/london-borough-profiles

Appendix 9 and 10 – Participant Information Sheet and Consent Form

University of
Kent

REQUEST FOR PARTICIPATION IN RESEARCH
The Benefit Cap Policy and Homelessness in London

You are invited to participate

You are invited to participate in a qualitative research project entitled: Governance of Welfare and Homelessness – The Implementation of the Benefit Cap (Housing Benefit) Regulations 2012 in London. The project is being conducted by postgraduate research student, Jellina Davies, as part of a PhD programme in Social Policy at the University of Kent under the supervision of Dr Lavinia Mitton and Dr Anne Logan.

Project explanation

The study focuses on welfare reform implementation and, in particular, the mechanisms local authorities employ to satisfy their statutory duties towards benefit-capped, unintentionally homeless families in the wake of the Benefit Cap Policy

The research will be framed by questions on welfare benefit advice and support, procurement and provision of temporary accommodation, housing options (including prevention and monitoring), and discharge of interim and full housing duties.

What will be the research procedure?

Your participation will involve a maximum 60-minute, one-on-one semi-structured interview to be conducted in person. You will be encouraged to share your knowledge and experiences relevant to homelessness prevention and provision in the wake of the benefit cap policy.

Before you agree to participate in this study, I will answer any questions you may have about the study and your proposed participation. You can contact me by return email with your questions or to request a telephone call to discuss your queries. Once you are sure that you have all the information you require and know the remits of the study, you will make your decision. If you agree to participate in the study, I will contact you by telephone to arrange a mutually-convenient time and place (preferably a space within your office so as to minimise disruption to your work) for the session.

During the interview, you will be asked a series of questions about your work role in relation to implementation of the benefit cap and homelessness provision within your organisation. These questions are designed to allow you to share your knowledge and experiences, as a local government officer, on how your role within the organisation helps in implementing and meeting the objectives of the benefit cap policy. After the interview, I will take a few minutes to debrief you on your participation experience.

With your consent, the interview will be tape-recorded. Recording the interviews will help me to concentrate on our conversation and also will ensure that your comments can be recorded accurately when the data is transcribed later on.

What will I gain from participating?

Your participation in this project will allow you, as a housing professional, an opportunity to share your experiences, interpretations, and insights that you have gained through your professional practice. It will also provide data that can shed light on the tensions (and contradictions) between the various legislations and case law surrounding contemporary homelessness provision and how local authorities in London fulfil their statutory duties in the face of housing affordability and availability concerns. Furthermore, the study will contribute as new knowledge to complement existing academic literature and previous research while providing valuable first-hand information expressed by housing professionals themselves in the homelessness field.

Ethics

The research project outline has been granted ethical approval by the University of Kent Ethics Committee. Included in the application to the Committee was an assurance that the study will adhere to the Data Protection Act 1998 and the ethical requirements of the University of Kent and Social Policy Association.

All information that you share in this research study will be kept strictly confidential. No personal information about you will be recorded, only your views on the questions asked. Your data will be given a pseudonym rather than your real name or that of your organisation. The only exception is when you are signing the consent form where you will need to give your correct details to authenticate your participation. To protect your privacy, your data will be kept separate from your consent form so that both are not linked. If, however, you wish to waive your right to anonymity and allow me to disclose your identity, that would be an option for you too.

When the results of the study are published, you will not be identified by name (unless you wish me to), and I may use direct quotations of what you have said during the interview. All research materials will be kept at the University of Kent archives for 3 years after the study has ended and will be accessible only to academic staff who are also aware of their ethical responsibilities. In the meantime, the study data will be kept in the university's server and all copies will be password-protected. Should the need arise, my supervisors will have access to the unidentified data or, where inspection is needed, the members of my examining board may do so during the review process.

Feedback of the Results of the Study to Participants

Although you may review the transcript, if requested, data will not be erased. However, you will be invited to clarify any information you so wish. I will also be more than happy to provide you with a summary of the research report if you just let me know.

Use and Subsequent Use of Collected Data

The results of this study will be used to complete my PhD research project at the University of Kent. The results will also be made available to the public and other interested research users. Furthermore, the research results may be published in academic journals and presented at professional meetings, conferences and seminars but only anonymised data and patterns will be described, and your identity will not be revealed. It is also likely that the data collected, and the findings of the study, will be used in subsequent research.

Risks

This study does not involve any type of known physical or emotional risks or harm to you. You will only be asked questions about your role within your organisation in relation to the benefit cap policy implementation.

Who is Sponsoring the Research?

The research is privately-funded and is being carried out in partial fulfilment of the award of PhD in Social Policy.

Your Right to Refuse or Withdraw

The decision to participate in this study is entirely yours. You may refuse to take part in the study without giving reasons. If you initially agree to participate, and at a later time decide to no longer be part of the study, all you need to do is advise me of your decision. I will immediately stop collecting data from you and, if you wish me to, I will destroy all information thitherto collected except the
signed consent form. By the same token, if at any time after the data collection starts I feel it is in your best interest to terminate your participation in the research, I may do so with or without your consent.

For further information
Please contact: Jellina Davies (jmd49@kent.ac.uk) on 07947 510 888 or my supervisors - Dr Lavinia Mitton (L.Mitton@kent.ac.uk) and Dr Anne Logan (A.F.Logan@kent.ac.uk).

University of Kent

Title of Project:	Governance of Welfare and Homelessness – The Implementation of the Benefit Cap (Housing Benefit) Regulations 2012 in Greater London	**Ethics Approval:**	Granted
Investigator:	Jellina Davies	**Researcher Email:**	jmd49@kent.ac.uk

RESEARCH PARTICIPANT INFORMED CONSENT FORM

Please read the following statements and, if you agree, initial the corresponding box to confirm agreement:

Initials

I confirm that I have read and understand the information sheet for the above study. I have had the opportunity to consider the information, ask questions and have had these answered satisfactorily.

I understand that my participation is <u>voluntary</u> and that I am free to withdraw at any time without giving any reason.

I understand that my data will be treated confidentially, and that information gained from my participation in this study may be published in social policy literature, discussed for educational purposes, and used, generally, in the furtherance of social policy research. I also understand that by participating in this investigational study, I will **not** be personally identified.

I also hereby give consent to audio-record the interview and for the subsequent use of the data for the study.

Signatures:

_____   _____   _____
Name of participant (block capitals)   Date   Signature

_____   _____   _____
Researcher (block capitals)   Date   Signature

If you have any complaints or concerns about this research, you can direct these, in writing, to Nicole Palmer, University of Kent's Research Ethics and Governance Officer at N.R.Palmer@kent.ac.uk.