

## Policy: briefing

# Payment by Results:

## What does it mean for housing advice?

### Summary

Payment by results is an approach under which commissioned services are paid for only if and when a specified outcome is achieved. It has been in operation across various government departments for some time. However the plans to roll it out more widely, including across welfare services, indicate a clear shift in favour of this model.

An emerging development in the payment by results field is the Social Investment Bond. The SIB model is attractive to Government because it involves a third party investor funding and taking on the risks of service delivery. It is currently promoted as a way to finance the voluntary sector to tackle disadvantage.

This briefing considers payment by results in relation to housing advice. Shelter supports an approach to commissioning which emphasises the beneficial outcomes of housing advice services. With payment by results, commissioners would need to identify appropriate outcomes at the commencement of a contract. Careful consideration must be given to the period over which outcomes are measured and whether proxy outcomes might be appropriate.

Commissioners need to be aware that particularly vulnerable clients and particularly urgent problems are more likely to be associated with face to face than telephone services. Furthermore, research shows that there are significant differences in outcomes achieved by telephone and face to face advice. It is essential for commissioners to understand how choice of delivery channels relates to outcomes.

There is a new emphasis on payment by results creating cashable savings.

Much of the value of housing advice derives from its role in preventing ultimately more costly scenarios such as eviction and homelessness. Such savings are not readily cashable and this may pose difficulties for commissioners and providers.

It is common practice in the sector to follow up a sample of clients assisted to assess outcomes. In payment by results, where the commissioner only pays for particular outcomes, it would be necessary to follow up every case to determine the client outcome. Based on sector experience to date, this would be disproportionately expensive.

If payment by results removes the scrutiny of the process by which advice is delivered, commissioners will need to establish an alternative means of ensuring quality measures are observed.

If housing advice is to be effectively commissioned and delivered on a payment by results basis, investment will be needed to develop

- a framework to identify the units of advice for which payment could be made; and
- a tariff system with appropriate incentives to ensure that providers meet the needs of particularly vulnerable clients or those with complex cases.

Whilst SIBs provide upfront funding to small organisations unlikely to be able to sustain payment in arrears, they are new and relatively untested. A gradual shift of funding mechanism is likely to be significantly less damaging to the viability of small not for profit organisations which make up most of the sector.

## Introduction

The independent advice sector is in flux. All of the funding streams which enable free legal advice to be provided have an uncertain future. In June 2011, the Government said:

*We will be developing a plan for the future central government funding arrangements for advice services to simplify, streamline and consolidate the current complex funding mechanisms and to recommend sustainable alternative funding models.*<sup>1</sup>

At present these plans are in their infancy. The Cabinet Office Advice Review is currently assessing the funding framework, working out how advice can be better funded, commissioned and delivered in the future.

At the same time, the Government's Open Public Services White Paper<sup>2</sup> includes a new emphasis on outcomes-based funding mechanisms. Central government and local authorities are increasingly considering building in an element of payment by results to the commissioning of publicly funded services, including in welfare services where this method has not traditionally been used. This briefing considers payment by results and assesses key questions in relation to its application to independent housing advice funding.

## What is payment by results?

The term 'payment by results' (PbR) is used in association with a range of different funding and commissioning settings. Although there is no standard definition, the term is widely used to describe an approach under which commissioned services are paid for only if and when a specified outcome is achieved. This is in contrast to more traditional funding mechanisms which pay at the commencement of a contract and according to the activity of the provider, regardless of outcome.

The Government favours PbR as a way of improving public service delivery throughout the term of any contract. It argues that, if providers are aware that they will only be paid for an agreed result, they have a greater incentive to deliver those good results. It is intended as a way of obtaining better value for money for taxpayers in that poor

quality outcomes are not remunerated, eliminating waste and making providers more accountable. By emphasising the end result, rather than the process, it encourages providers to innovate and explore improved ways of delivering services.

PbR is not new and has for some time been operating across various government departments such as the Department of Health, Department of Work and Pensions and the Ministry of Justice. However, the plans to roll it out widely, including across welfare services, indicate a clear shift in favour of this model. It creates a new urgency for both officials working on advice matters and advice providers to consider the benefits and lessons of PbR to date and apply them to the commissioning of advice services.

## Examples of PbR

There is no single PbR model, but rather a range of models which incorporate the principle of paying for outcomes rather than provider activity. This is a rapidly developing area and new pilots are emerging to test how PbR may be applied to different areas of public service delivery.

One of the longest standing examples of PbR is in the health service, where it was introduced in 2003-04. In the NHS, the payment by results mechanism pays healthcare providers for each patient seen or treated, taking into account the complexity of the patient's healthcare needs. Before PbR, commissioners tended to have block contracts with hospitals where the amount of money received by the hospital was fixed irrespective of the number of patients treated.<sup>3</sup> The shift to PbR was intended, among other things, to incentivise hospitals to see more patients and bring waiting lists down. Around 60% of all NHS contracts are now commissioned on a PbR basis.

In 2008, the DWP published a commissioning strategy which introduced a much greater focus on payment by results when awarding welfare to work contracts.<sup>4</sup> In 2011, the DWP launched the Work Programme, under which providers deliver personalised back to work support packages for those at risk of long-term unemployment. Service users have to return to work for a fixed period before an 'outcome' is achieved and payment made. There are graded payments, with higher payments made for those considered harder to help.

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<sup>1</sup> [Reform of Legal aid in England and Wales: Government Response p76, MOJ, 2011](#)

<sup>2</sup> [Open Public Services White Paper](#), Cabinet Office, 2011

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<sup>3</sup> [A simple guide to payment by results](#), DOH, 2011

<sup>4</sup> [Specialists must help the long-term unemployed not just find work but stay in work, DWP, Feb 2008](#)

The Ministry of Justice has been developing a number of PbR schemes both in prisons and in the community in its work to reduce reoffending. In these schemes, payments are made according to an agreed pattern, but with payments increasing as results increase. In 2011, the DCLG invited local authorities to explore the application of PbR to Supporting People funded services. PbR is currently being piloted in ten local authority areas, with each pilot testing PbR approaches with a different housing-related support service and client group. Some of the pilots split existing contracts, with 80% of the contract being paid as usual and a further 20% withheld and paid as a reward. Other pilots are trialling rewards to individual services, whole teams, whole organisations or individual workers.<sup>5</sup>

PbR is currently being applied to many areas of public service commissioning including public health, drug and alcohol recovery, children's centres, rough sleeping services and work with families with multiple problems.

## Social Investment Bonds

An emerging development in the PbR field is the Social Investment Bond (SIB). This particular model has been developed by Social Finance, an organisation set up to build the social investment market in the UK. This model is characterised by the use of social investors who are motivated to fund and take on the risks of service delivery. Social investors are used to provide the upfront funding for services delivered by a range of providers. The public sector reimburses the investor only if the intervention is successful. If outcomes improve and savings are made, the investor receives the returns on their investment.

The first SIB was launched in September 2010.<sup>6</sup> The Ministry of Justice entered into a contract with a partnership of investors to reduce re-offending among those leaving Peterborough Prison (see Figure 1). On the back of this contract, the Social Impact Bond secured nearly £5 million of social investment to fund a number of service providers to support ex-prisoners by helping them to find a home and a job, addressing family problems or

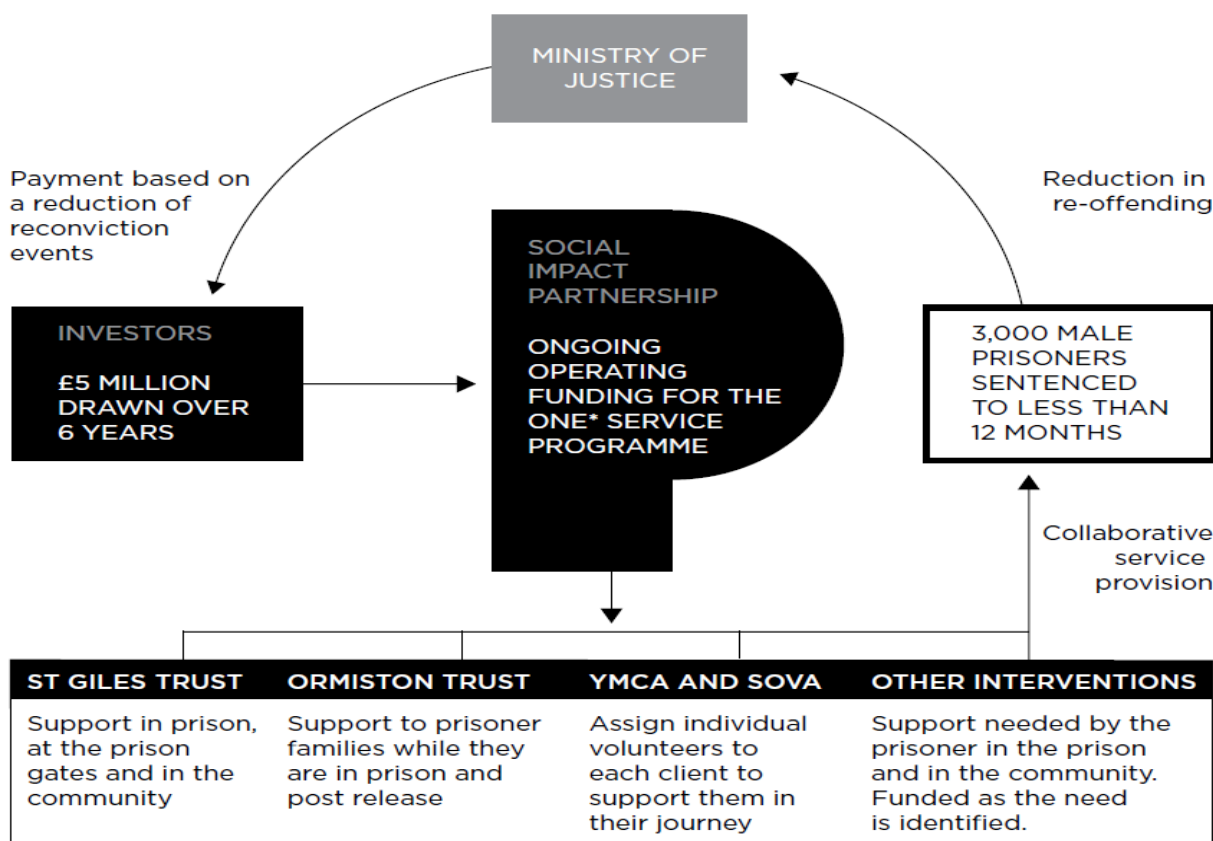


Figure 1: Peterborough Social Impact Bond  
From *Social Finance A Technical Guide to Commissioning Social Impact Bonds* p5.

<sup>5</sup> For further information on the Supporting People pilots see the Sitra website: [www.sitra.org/pbr/](http://www.sitra.org/pbr/)

<sup>6</sup> [Lessons learned from the planning and early implementation of the Social Impact Bond at HMP Peterborough](#), MOJ, 2011

tackling addiction. Payment will only be made back to investors if re-offending falls.

This model is being promoted as a potentially useful way of funding services where commissioners are seeking social welfare services which are complex, which may be best delivered by smaller voluntary sector organisations and/or which are preventative in their nature and therefore pose difficulties when it comes to measuring outcomes and cost savings in the short term. Examples include:

- Reducing re-offending;
- Supporting families and young people with multiple problems to break out of long term cycles of deprivation and dependency;
- Helping people tackle drug and alcohol addiction;
- Addressing homelessness;
- Preventing young people from becoming workless; and
- Managing chronic health problems such as diabetes and asthma.<sup>7</sup>

There is an appetite in Government to explore the use of a model which mixes PbR with a SIB. The SIB model is attractive to Government because it involves third party investors carrying the risk and is currently being promoted as a way to finance charities and the voluntary sector to tackle disadvantage. This is particularly the case where a range of organisations are needed to deliver the desired result. An important factor is that it provides upfront funding for prevention and early intervention services, thereby addressing the problem of cash flow for small organisations unable to sustain payment in arrears for their work. New pilots are currently being developed which combine SIB/PbR funding for work with families with multiple problems.<sup>8</sup> A new rough sleeping SIB has also been announced in London.<sup>9</sup> However, it is a relatively untested model to date, having only been implemented in Peterborough Prison.

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<sup>7</sup> [A Technical Guide to Commissioning Social Impact Bonds, Social Finance, 2011](#)

<sup>8</sup> In Hammersmith & Fulham, Westminster, Birmingham and Leicestershire see: [www.cabinetoffice.gov.uk/news/big-society-innovation-aims-get-families-out-deprivation](http://www.cabinetoffice.gov.uk/news/big-society-innovation-aims-get-families-out-deprivation)

<sup>9</sup> New £5m 'payment by results' deal to get rough sleepers off London's streets  
<http://www.communities.gov.uk/news/corporate/2100913>

## Applying PbR to housing advice

Shelter supports an approach to commissioning which emphasises the beneficial outcomes of housing advice services. However, not all advice funding works to the same outcome requirements. Different funders require different measures of success. As recognised by the White Paper, a further shift towards PbR creates new challenges for commissioners in setting and monitoring appropriate outcomes. Some of these challenges are shared with other public services; others are more specific to the advice sector.

## Commissioning the right outcomes

Across all public services there is a need to identify appropriate results at the outset of the contract. In housing advice, as in many other areas, this can be complex and is exacerbated by the varying use of terminology. Although there is broad agreement that PbR schemes aim to pay for outcomes rather than outputs, in practice the distinction is blurred. This is not necessarily problematic if the outputs in question are appropriate measures of what the commissioner is trying to achieve, but it does blur the boundary between output and outcome. In health, payment is made per treatment or intervention e.g. £59 for a minor A&E attendance, £903 for cataract surgery, £5,640 for a hip operation. This is not so different from fixed fees in Legal Services Commission contracts, under which providers are paid a fixed fee per matter, which varies between categories of law.

## Outcomes in advice work

In recognition of the need to demonstrate the value of its work, the Not for Profit [NfP] advice sector has sought to measure the impact of its work on the lives of clients.<sup>10</sup> The Advice Services Alliance has defined terms as follows:

- INPUTS are the resources that contribute to the work of the agency e.g. staff, premises, equipment;
- OUTPUTS are the services that the agency delivers e.g. advice sessions, information leaflets, casework, advocacy and representation, social policy work;

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<sup>10</sup> For example, Outcomes of advice for struggling homeowners (Shelter 2010), Outcomes Research - Key findings Report (Shelter 2006), [The outcomes of CAB Advice](#) (Citizens Advice 2009), [The Socio-Economic Value of Law Centres](#) (NEF 2008)

- **OUTCOMES** are what the agency achieves as a result of pursuing its aims.

ASA goes on to identify four main categories of advice outcome which could assist commissioners in determining their aims:

- client outcomes - how the advice changed an individual client's life e.g. made them healthier;
- advice outcomes - what happened as a result of the advice intervention e.g. client housed, repairs done;
- legal and policy outcomes e.g. a change in the practice of third parties (such as landlord practices improving) which benefit a particular class of potential clients;
- community outcomes e.g. general improvement in local housing conditions, less social exclusion.<sup>11</sup>

This work was undertaken in response to an increased interest among voluntary sector organisations in understanding the consequences of their work. Achieving clarity and consensus around the broad framework of outcomes that can be measures could assist a shift towards outcomes-dependent funding, but it also raises further questions about the practical implications of payment by results.

### Time lag & proxy outcomes

Some of the identified outcomes for advice can take longer to deliver than the duration of the contract in question. In other instances, a client may receive one-off advice and then not approach the provider again. These problems raise two questions:

- Over what period should outcomes be measured?
- Are proxy outcomes, which may be measurable over a shorter timescale, appropriate?

Proxy outcomes can be helpful when the desired outcome is itself not measurable. However, if used, commissioners need to guard against the danger of resources being directed towards areas that are more easily measurable. The NHS and education both provide examples of this. For example the focus on five A-C grades at GCSE is widely perceived to have shifted the focus of investment

<sup>11</sup> [A Practical Guide to Outcomes for Advice](#), ASA, 2005

away from the standard of qualifications and fuelled the growth of the many vocational qualifications that are perceived to be easier to obtain. In the NHS, an emphasis on waiting lists may divert resources to patients on the margins of a waiting limit rather than treating according to a health need or a relevant measure of health outcomes. It is important that any outcomes selected for assessing payment by results do not create perverse incentives or distort provider behaviour.

### Cherry picking

Any funding scheme needs to be aware of the problem of perverse incentives and PbR is no exception. The DWP<sup>12</sup> has noted the potential for PbR schemes to lead to cherry picking i.e. choosing cases most likely to improve the performance measure and therefore the amount of funding received. Research shows that housing problems do not affect everyone equally, but rather those most likely to have housing problems are also likely to be particularly vulnerable in other ways e.g. more likely to be unemployed and/or long term sick or disabled, particularly with mental health problems. There are also strong associations between housing problems and other factors such as relationship breakdown and domestic violence.<sup>13</sup> Any PbR scheme in housing advice would need to ensure a system of fair remuneration for work with particularly vulnerable clients. The current LSC contracting regime pays a fixed fee per case, but this amount increases if the time spent on the case rises above a stated threshold – three times the value of the fixed fee. There is a strong case for graded tariffs to reflect the complexities of the client work carried out and guard against cherry picking.

### Commissioning Conflicts

Commissioners will need to ensure that required outcomes do not create conflicts of interest for the advice provider. Independent advice providers are under an obligation to act in the best interest of the client. Payment systems need to ensure that they do not encourage outcomes which may benefit the commissioner at the expense of the client. For example, a local authority commissioning housing advice must be careful to ensure that it does not incentivise independent advisers to divert clients away from seeking assistance from the local authority, when it may be in the best interest of the client to do so.

<sup>12</sup> [Provider-led Pathways to Work: the experiences of new and repeat customers in phase one areas](#), DWP, 2011

<sup>13</sup> Housing problems in England and Wales, Pleasence & Balmer, 2011 (unpublished)



## Delivery channels

Exploration of PbR is coming at a time of flux in the advice sector. One key shift is the new emphasis on technology to aid delivery of advice services. The Government's intention is for legally aided advice to be accessed via a mandatory telephone gateway. Although at present this is only being proposed for three areas of law (debt, special educational needs and discrimination), it is the Government's aim that it should be rolled out more widely.

However, there is evidence to suggest that outcomes vary depending on the delivery channel used. A study, which used LSC data on legal aid for housing problems, considered the similarities and differences between the delivery of telephone and face to face housing advice.<sup>14</sup> It found that certain client groups and certain types of problem tended towards particular channels. Clients under 18 and those living with an illness or disability, particularly those with mental ill health, were more likely to use face to face than telephone services. There was also evidence to suggest that more urgent problems such as homelessness were more likely to be associated with face to face advice.

This study also considered outcomes. An initial analysis found comparable positive outcomes for both channels. However, a more sophisticated analysis of the data comparing like with like, found a significant difference between the outcomes achieved by telephone and face to face advice. Whereas most of the beneficial outcomes for telephone advice consisted of enabling clients to plan or manage their affairs better, more tangible outcomes were achieved for face to face advice. Outcomes such as the client being housed, rehoused or retaining a home or having repairs carried out were rare for telephone advice and were much more likely to be associated with a face to face service.

It will be essential for commissioners to understand how choice of delivery channels relates to outcomes, in order to avoid a situation where for example, telephone services may be expected to deliver outcomes which are much more likely to be achieved through face to face services. Similarly, commissioners will need to ensure the continuation

of face to face services to address the housing problems of the most vulnerable clients.

## Attributing outcomes to the provider

In common with many public services, the outcomes of housing advice work depend, at least in part, on the effectiveness of other services, and are clearly influenced by the wider context in which advice operates.

An agency working with an effective housing authority in an area of relatively low housing pressure is likely to achieve better outcomes more easily for its clients than a similar agency working in an area of high housing demand. Changes in legislation also affect the providers' ability to secure specific outcomes. For example, the measures in the Localism Act 2011 amend certain housing duties placed on local authorities; in turn this affects an advice provider's ability to ensure a client is securely housed.

Advice clients often experience clusters of interrelated problems. In these cases it is usually only the resolution of the problem cluster which can result in a substantive outcome for the client. For example, a client facing eviction due to rent arrears may also have a housing benefit problem. Eviction may be fought off temporarily, but only the resolution of the benefits problem will ultimately result in the housing matter being satisfactorily resolved. The current cuts to benefits advice and casework will impact on the ability of housing advice providers to resolve fully client housing problems.

Where housing advice is just one strand of an overall package of services commissioned to deliver a particular outcome (e.g. reduction in reoffending), the outcome measures chosen will need to be capable of being attributed specifically to the advice provider, rather than judging the results of advice by reference to an overarching outcome which may not be advice-specific.

## Prevention & cashable savings

There is a new emphasis on PbR achieving 'cashable' savings i.e. savings capable of being turned into hard cash – most obviously by improving outcomes to the point where services are no longer needed and can be closed. Much of the value of housing advice derives from its role in preventing unwelcome and ultimately more costly scenarios such as eviction and homelessness.

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<sup>14</sup> Balmer, Smith, Denvir & Patel, *Just a phone call away: Is telephone advice enough?* Journal of Social Welfare and Family Law, Volume 33, Issue 4

Studies have demonstrated the spend-to-save benefits of investing in advice services; for example, Citizens Advice estimates that for every £1 of legal aid expenditure on housing advice, the state potentially saves £2.34.<sup>15</sup> However, the savings from housing advice are not readily cashable. This is in part due to the fact that preventative services may be highly successful, but if they are closed down, the problem reappears; in addition, the pool of unmet need for advice means any improvements in efficiency simply enable more people to receive assistance – i.e. it is a productivity gain rather than a cashable saving.

### **Cost of outcomes monitoring**

Monitoring client outcomes can be costly, in particular for the small organisations which make up much of the NfP advice sector.<sup>16</sup> In order to establish how the advice may have changed a client's circumstances, providers follow up a sample of clients and survey them. This produces helpful data which enables providers to monitor the usefulness of their work. However, in a PbR setting, where the commissioner only pays for particular outcomes, it would be necessary to follow up every case to determine the client outcome. Based on sector experience to date, it would be disproportionately expensive and cumbersome to measure outcomes in each individual case, rather than a sample.

### **Quality monitoring**

A study<sup>17</sup> published in 2001 considered the impact of different payment regimes on quality. It concluded that the highest quality advice work was achieved when payment was made regardless of minimum volume requirements and the lowest quality when fixed fees for a specific number of cases was stipulated. The research also found that there was a link between achieving positive financial results for the client and the quality of the work. However, achieving positive financial results for the client was not a perfect predictor of quality.

Commissioning on a PbR basis explicitly focuses on the end result rather than the process, and as such can encourage providers to innovate and

explore improved ways of delivering services. There is an implication that if the results are good, then good quality work is being carried out. However, PbR would not necessarily guarantee quality in housing advice work. In independent advice services, quality is controlled through independently audited quality standards and peer review. These indicators reflect the quality of the work e.g. that the advice given is legally correct, that conflict of interest checks have been carried out, that client confidentiality is observed. In advice work, a poor client outcome such as the client being unhappy about the resolution to their case, does not necessarily indicate poor quality work on the part of the advice provider. The client may have been correctly advised that they have no legal remedy. If PbR removes the scrutiny of the process by which advice is delivered, commissioners will have to establish an alternative means of ensuring quality measures are adhered to.

### **Currencies for housing advice**

The combination of outcomes and the relative emphasis given to each will be key in determining the success of any scheme. As discussed, an overemphasis on any one element could skew the provision of effective services. Developments in the health service have led to commissioners agreeing 'currencies'- units of healthcare for which payment is made. A currency is intended to be a meaningful group of diagnoses and interventions that consume similar levels of resources. These currencies can take a number of forms covering different time periods from a one off appointment to a year long hospital stay.

If housing advice is to be effectively commissioned and delivered on a PbR basis, investment will be needed to develop a workable framework to identify the currencies or units of advice for which payment could be made. Any currency developed would need to be sophisticated enough to include the wide range of interventions and outcomes appropriate to housing advice work and the diversity of its users.

Without such a framework, each commissioner would have to consider afresh the complex question of appropriate outcomes for housing advice work. In future, independent advice is likely to be commissioned both at central government and also at local authority level. With a new emphasis on shared services and joint commissioning, housing advice may be included in tenders with a non-advice specific outcome e.g. reducing drug dependency, reducing reoffending. The housing advice element of such a package needs to contribute to those outcomes but will need its own outcome measures. Such a currencies

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<sup>15</sup> [Citizens Advice, Towards a business case for legal aid, 2010](#)

<sup>16</sup> See [ASA outcomes evaluation – lessons learned from the pilot: 2010](#) and [Client Outcomes: Recommended approach & resources \(Citizens Advice 2009\)](#)

<sup>17</sup> Moorhead et al, Quality and Cost, Stationery Office, 2001 . The study considered a total of 80,705 files – 15,831 of which were housing.

framework would need to be developed in close dialogue with the housing advice sector.

## Payments/ tariffs

Commissioners will need to decide on the relative emphasis given to payments based on both the level of activity and payments for outcomes. Each has advantages and disadvantages. Activity-based payment such as in the health service or the LSC, has the potential to be cheaper to administer. In some circumstances, it may also be a fairer reflection of the work that needs to be done. For example in the advice sector, advisers often need to carry out significant amounts of work before the likely outcome of a case can be properly assessed. Regardless of the relative emphasis chosen, it would be appropriate to create incentives such as graded tariffs to ensure that providers meet the needs of particularly vulnerable clients or those with complex cases.

## Could SIBs work for housing advice?

Although SIBs are being promoted as possible mechanisms for welfare services, Shelter has a number of questions as to their appropriateness for independent housing advice services.

While it is true that SIBs provide upfront funding, it is also true that the SIB/PbR model is also one which requires a wholesale shift in funding mechanism, rather than a gradual introduction of PbR over time. A gradual shift of funding mechanism is likely to be significantly less damaging to the viability of small voluntary organisations.

Many current providers of housing advice are relatively small NfP organisations. Approximately 97% of voluntary and community sector organisations have incomes of under £500,000; only 438 charities have an income of over £10 million (accounting for 44% of the sector's income). Housing advice contracts themselves are often small. The Legal Services Commission social welfare law tender round in 2010/11 resulted in 74% of contracts where a maximum of one full time worker was required to deliver the work.

These small NfP organisations have to juggle multiple funding streams with little capacity to absorb disruption or changes to cash flow. Hasty or wholesale changes could threaten the viability of some agencies. The introduction of any scheme would need to be carefully managed and the provision of transitional support considered.

SIBs are dependent on philanthropic funding, which is unlikely to be equally available in all areas. A disproportionate emphasis on SIBs may exacerbate the existing problem of advice deserts.

## A hybrid approach

The Department of Communities and Local Government is currently working with a number of local authorities, supporting them to explore different approaches to PbR in housing related support contracts. These pilots started in 2011, are due to run until 2013, and are to be independently evaluated. The first interim evaluation is due towards the end of 2012.

Islington Council in London is running one of the pilots. It has developed an outcomes framework in partnership with providers and has assumed that providers receive 80% of funding in the usual way to fund activity needed to deliver outcomes. Up to 20% would then be paid on the achievement of agreed outcome targets. For the purpose of the pilot, the payment mechanism is 'virtual', looking at what would have happened to payments if the PbR funding was in place. This allows the council to consider the impact and risks of this approach before implementation.

Shelter supports such a thoughtful approach and recommends that any steps to implement PbR across advice services is piloted carefully and that virtual assessments are carried out before full implementation.

For further information, please contact Elizabeth O'Hara in the Shelter Policy Team on [elizabeth\\_ohara@shelter.org.uk](mailto:elizabeth_ohara@shelter.org.uk) or 0344 515 2045.

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## Recommendations

- If housing advice is to be effectively commissioned and delivered on the basis of Payment by Results, investment will be needed to develop a workable framework to identify the currencies or units of housing advice for which payment could be made.
- Such a currency framework would need to be developed in close dialogue with the housing advice sector as it will need to be sophisticated enough to include the wide range of interventions and outcomes appropriate to housing advice work and the diversity of users.
- Outcomes measures for payment by results will need to be sensitive to the delivery channel commissioned.
- Quality measures need to be in place to ensure best practice in advice continues.
- A tariff system will need to be developed to ensure appropriate payments, including graded payments for more complex work, to prevent cherry picking.
- Social Investment Bonds are promoted as positive for the not-for-profit sector, yet are still relatively untested. Moving to a social investment bond model would involve wholesale and potentially damaging changes for small organisations, and consequently should not be rushed into.
- A hybrid approach allows payment for services while the impact of payment by results is being tested. Virtual piloting of Payment by Results in housing advice must be considered before any wider implementation in the sector.

Shelter, the housing and homelessness charity.

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