

Agenda Supplement – Public Accounts Committee

Meeting Venue:

For further information contact:

Committee Room 3 – Senedd

Fay Bowen

Meeting date: 15 January 2018

Committee Clerk

Meeting time: 13.45

0300 200 6565

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– The Welsh Government’s Supporting People Programme: Consultation Responses

Please note the documents below are in addition to those published in the main Agenda and Reports pack for this Meeting

8 The Welsh Government’s Supporting People Programme: Consultation Responses

(Pages 1 – 138)

Attached Documents:

SP 01 Cornerstone Support Services Limited

SP 02 The Wallich

SP 03 Isle of Anglesey County Council

SP 04 Gwynedd Council

SP 05 Wrexham County Borough Council

SP 06 Community Housing Cymru

SP 07 Individual

SP 08 Denbighshire County Council

SP 09 Gwent Regional Collaborative Committee

SP 10 Llamau

SP 11 Minister for Housing and Regeneration

SP 12 Hywel Dda university Health Board

SP 13 CIH Cymru

SP 14 Welsh Women’s Aid

SP 15 Tai Pawb



SP 16 Welsh Local Government Association

SP 17 Merthyr Tydfil County Borough Council

SP 18 Cymorth Cymru

Cornerstone is a small organisation that was formed when a group of friends who had all worked within the Housing Related Support field got together and decided that they would like to move away from the larger organisations and set up on their own.

In particular, this group had a passion for working with people who were street homeless. We approached the Caerphilly Supporting People Team and a decision was reached to try a small, short pilot to see if there was demand for a specific Rough Sleeper Project within our locality. It quickly proved to be the case.

This was three years ago, since then we have housed 320 people who had found themselves homeless and sleeping rough or 'sofa-surfing'. Despite many of these service users having complex needs and chaotic lifestyles we are also proud to report that of these new tenancies over 95% are being maintained to this day.

Critical to the success of the project which is now off pilot and, following an exhaustive tendering process is still being provided by Cornerstone, is the close working relationship we have with our Supporting People Team. Not only is the success of the project built upon the courageous decision they took to run such a pilot, but also on the ongoing support they provide to each of us on a daily basis.

Communication between both parties is fluid and regular. Advice is sought on a 2 way basis. Guidance is given to all staff to ensure that we work strictly within the parameters of the SP programme and that all that we do is towards the overarching aim of promoting independence.

The nature of the rough sleeper work means that we are providing support in all of the outcome areas laid out by Welsh Government. Our primary objective is to secure appropriate accommodation but in order to ensure that this can be maintained in the longer term we regularly address issues around addiction, legal matters, health issues, access to employment and mental well-being. We believe that by helping people off the streets and into a home we bring a significant cost reduction to the statutory services that would likely have been involved should this rooflessness have continued.

For some service users, sleeping out is a life choice that they have made and in these (thankfully rare) instances we provide whatever support is needed to help maintain life, particularly during inclement weather. This can be through the provision of sleeping bags and warm clothing, food that can easily be consumed and advice on how to sleep out safely.

Another vital tool in helping address rough sleeping in Caerphilly County Borough, is the Caerphilly Churches Night Shelter. Now in it's 6th year, the shelter opens for the 4 months of the year when the temperatures are at their lowest. Partly funded by the SP team, the church will accommodate up to 8 people per night providing a hot meal, a warm bed, a cooked breakfast and a packed lunch for the next day. It is a scheme that is without doubt life-saving and the partnership between the Cornerstone and the churches has been critical.

In order to achieve optimum effectiveness in the work we do, our partnerships have been key. To this end we work closely with; Neighbourhood Police Teams, National Probation Service, Specialist drug and alcohol teams and the local mental health unit amongst others. We regularly attend and host multi-disciplinary meetings in order to share intelligence as to where people may be sleeping out and information as to what is known about that person/s in order that we can best support them. We are also a registered partner of Street Link Wales and wherever a referral is generated, we aim to respond on the same day as the window of access can sometimes be limited.

As the service has developed we have identified the increasing need for support for people coming out of custody where there is no longer a duty for the Local Authority to provide emergency accommodation. As part of a partnership between our SP team and local National Probation Service Officers, a pathway has been drawn up to be followed in all such cases in order to help better meet the housing needs of this group. We were delighted that this was seen as something that fit our project given the chance of these prison leavers ending up on the street. We have helped implement this pilot pathway and it is working well. There had been an expectation amongst many that the change in the Housing Act could lead to a rise in re-offending rates but by securing appropriate housing in a timely manner we are pleased to report that this has not been borne out. We are now being approached by other boroughs within Gwent with a view to replicating this as best practice, and hope to take it even further.

It is our belief that the work we are commissioned to carry out by our Supporting People Team is a vital service, particularly when bearing in mind the recent reports highlighting the increase in rough sleeping and the publicity this has brought. As a direct result of the funding we receive 320 are no longer homeless and the Night Shelter is open now, saving lives, every day.

We constantly review our service and the support provision to ensure that we are delivering value for money and that we make our funding go as far as possible. Any reduction or loss of funding can only have a huge detrimental impact on some of the most vulnerable within our community.

1. The impact of wider policy development

At the moment, key areas of policy development relate to:

- A Department of Work & Pensions (DWP) public consultation on rents and eligibility for Housing Benefit (HB) service charges
- Welsh Government (WG) proposals to implement the Full Flexibilities Grant, merging the Supporting People Programme Grant (SPPG) with a range of other grants

We have seen clarity when it comes to the overall programme objectives: the focus on prevention of homelessness, for instance, as well as offering support to individuals to maintain their accommodation in the community. Without this support, it is likely that a wide range of client groups with varied support needs would need an institutional setting, as opposed to a community-based tenancy.

In recent years, the Welsh Government's strategic aims for the Supporting People programme has been characterised by a series of letters from Ministers – these letters highlighted priority areas, emerging at various times at which the programme's aims might need to shift: examples include meeting the aims of the Housing (Wales) Act and the Health, Social Care and Wellbeing (Wales) Act; tackling poverty; investigating Adverse Childhood Experiences (ACEs); domestic abuse; and substance misuse in Wales.

It would be beneficial if the Welsh Government were to consolidate a coherent view on the purpose making the grant available and publish this, taking into account recent policy and implementation developments.

Recognition also needs to be given to the contribution that long term support services make to the wellbeing of people with mental health issues. In line with the Social Services and Wellbeing (Wales) Act, these services promote independent voices, and independence for individuals when it comes to control over the support they receive. They also contribute to prevention and early intervention, key priorities of the Act; it is vital that sight is not lost of this.

Similarly, it is vital that current non-statutory key priorities for Local Authorities do not fall by the way-side because Local Authorities can only afford statutory services.

A letter to the Chief Executives of Local Authorities in Wales stated:

“The Full Flexibility pathfinder will give 100% flexibility across grants in order to achieve increased programme alignment, make more effective use of funding and meet local needs. This greater financial freedom and flexibility is expected to enable pilot areas to work differently, giving more scope to design services to support the Governments drive for more preventative, long-term approaches.”

There is, however, limited understanding when it comes to some of the less well-known grants in the list contained as an appendix – in particular, it is unclear as to what some of these grants deliver on.

Currently, the majority of Supporting People funded services focus on preventative work. There could be a lack of regional preventative service delivery if Supporting People were subsumed into a ‘super grant’. We would argue that this grant should remain focused on prevention and early intervention, and are genuinely concerned that the Supporting People programme would be ‘diluted’ if it were merged with other grants programmes.

The issue of timing also raises questions. At present, there is a clear local governance process in place: this process includes a Local Plan, a Commissioning Plan, a Housing Plan, and a Regional Strategic Plan. Administering the proposed grant would require clear, strengthened governance processes to replace or amend existing ones. The time it would take for the Welsh Government to devise and issue guidance for the implementation for amalgamating up to ten grants needs consideration.

Furthermore, the Full Flexibility Pathfinder pilot will run from April 2018 to March 2019. The proposed super grant is to be implemented from March 2019 to April 2020. Considerable effort will be needed to put in place procurement and contract regulations in time for the super grant’s rollout in 2019.

There also appears to be little or no time to undertake a monitoring and evaluation exercise within the pilot areas prior to the super grant rollout. This leads to a danger that any failures of the pilot will be ‘inherited’ during the transition to the

super grant, as the time for monitoring and evaluation of the pilot is extremely limited.

There are also implications when it comes to the UK Government's Supported Accommodation review.

The current consultation proposal, as we understand it, is for a devolved pot for a short-term, temporary supported accommodation grant. Longer term, sheltered, and extra care are to remain in the welfare system, with increased regulation and monitoring of rents and service charges.

There are concerns about how the pot for short-term accommodation will be sized, and how its definition by the DWP will be used for up to two years – it is unclear as to whether dispersed temporary accommodation will be included in this definition. It is also unclear whether this pot will sustain existing provision, or whether it will be reduced before being devolved. We would also appreciate clarity as to how this supported accommodation grant would be developed by Welsh Government.

Development of the Welsh Government policy on the administration of the short term supported housing grant needs to be coordinated with the development of the Full Flexibility grant fund. Presently, the revenue for these services predominantly comes from the Supporting People grant. We need a strategic link to the levels of public capital subsidy, which impacts on rent and the service charges that service providers set.

Currently, little is known about the intentions of Welsh Government, but signs from England suggest the possibility of block funding provision to Registered Social Landlords to cover rent and service charge costs, with limited and affordable charges to tenants. If this were the case, then individuals would benefit from the more affordable charges, and be more able to focus on getting work ready while living in supported accommodation. There could also be positive impacts on arrears of service charges, and consequently on eviction rates.

Local Authorities in Wales would welcome following England's option to allocate funding to LAs to administer. This makes sense, and fits with the local role of LAs, as well as their statutory duties under homelessness legislation. Local Authorities also act as commissioners for supported housing, and prioritise locally allocated

public capital subsidy, including the Social Housing Grant (SHG) for Registered Social Landlords.

Regional Collaborative Committee provider members and Wallich staff have concerns that funding is maintained for this group of individuals, many of whom may be non-statutory groups at present. Their view is that some form of ring fencing or scrutiny is required to assure this resource is in place for the temporary supported housing grant, and Supporting People funding.

The DWP consultation document suggests that, in England, a framework for needs assessment processes and strategic plans will be introduced. In Wales, however, these are already in place, and there has been no regulation of RSL rent or service charges in supported housing at Welsh Government level.

Currently, these rental and service charge costs for temporary supported housing are predominantly scrutinised by Housing Benefits sections. If the short-term accommodation funding is devolved from the Welsh Government to Local Authorities, there may be a lack of capacity to undertake this work as Housing Benefit sections decline in capacity while welfare reform is rolled out centrally. Welsh Government needs to ensure that the skills, knowledge and understanding around rent and service charge costs are supported, and should consider making new burdens allowance for this work.

Support classified as 'sheltered' or 'extra care' comes with its own set of issues. Under these proposals, there is concern in relation to the impact that Sir Mansel Aylward's recommendation might have on services which have moved to be fully compliant – that is, they may not have a support package tied to the service any longer that still meets the definition of sheltered accommodation. The Welfare Benefit System might regard them instead as general needs.

Similarly, some newly built Old Age Pensioner (OAP) designated accommodation might have been developed with similar physical facilities, which necessitate higher rents and service charges, but might not meet the definition of sheltered accommodation because of the lack of commissioned support.

Likewise, longer-term support housing needs to be considered carefully. The consultation suggests there will be regulation of long term supported housing rents and service charges by central government, but there is no detail yet. Clarity

as to whether this regulation will be devolved to the Registered Social Landlord regulator in Wales is required.

Welsh Government should also consider how it might improve communication about the priorities for the Supporting People programme, and the impact of wider developments. We would find it beneficial for the view to be consolidated at government level as to the purpose of making the grant available, and to communicate this clearly and effectively. Currently, the guidance around Supporting People is heavily focused on administrative grant conditions, and bureaucratic details around governance and process, rather than purpose and priority.

We would also support the development of an up-to-date strategic document on the intention of the national programme aims, and ensure Welsh Government is resourced to regularly engage in the Supporting People Information Networks (SPIN) and Regional Collaborative Committees with relevant guidance.

Questions need to be answered as to how best to align the work of the RCCs with other collaborative governance arrangements; this alignment needs to be clarified at Welsh Government level in the first instance. The link between Social Services and Wellbeing Partnership Boards should be strengthened, as well as the links between those bodies and housing and homelessness teams.

The local programme delivery is driven by local homelessness strategy priorities but it seems there is no equivalent regional direction for this work. For example, Welsh Government have requested for homelessness strategies to be carried out by Local Authorities. The regional networks that have existed for Housing Strategy including homelessness have been on different footprints to Western Bay.

Supporting People funding is only one of a number of tools (although it is significant in its level of resource) used to tackle and prevent homelessness. It funds a considerable amount of accommodation and support, and yet it is administered within a highly prescribed and bureaucratic structure compared to other grants and tools.

Regional working over the past five years has had mixed effectiveness, with positive and negative aspects that could inform ways of working moving forward. Harmonising processes, for example, reduces workloads for providers. There has also been the sharing of resources, quality and performance information,

innovative ideas and good practice across Wales. Relationships have improved as a result.

However, regional working in Wales has also amplified some unnecessary bureaucracy – inherent, for example, in managing a local housing strategy instead of a regional one.

Any new governance and management arrangements for Supporting People funding should reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015, as the current system largely does. These five ways are: long term; prevention; integration; collaboration, and involvement. For the most part, the Supporting People programme performs well in these areas – particularly involvement, collaboration and prevention (there is a strong preventative focus in particular). The annual funding settlement, however, can hinder long term planning. Supporting People has also not fully delivered on integration.

A practical example of this is Swansea’s pilot directorate commissioning project for people with learning disabilities. The project aims to work with individuals and provide support across many aspects of their lives, from education to independent living, with focuses on preventing homelessness, accessing work, and aging. This has been devised in response to the Wellbeing of Future Generations (Wales) Act.

2. Monitoring and evaluation

We need clarity about how monitoring and outcome data will be used to inform decision-making about programme expenditure and contract monitoring, as well as the revised outcomes framework the Welsh Government is proposing, and the extent to which it will address the limitations of the current framework.

The development of the Health, Social Care and Wellbeing Outcomes has brought with it an opportunity to devise a single set of national outcomes that are used in a consistent way; this would reduce bureaucracy and administrative processes at a time of extreme pressure for Local Authorities and service providers. Welsh Government might want to consider a single set of outcomes across Welsh Government Directorates, creating consistency and maximising efficiency.

There is an inconsistency between social care outcomes for individuals and the outcomes of the Supporting People programme: the former are not collected

nationally, yet the latter, it has been decided, must be. Perhaps some reflection is needed to make sure this is the best course of action.

Any revised outcomes and framework arrangements need to be communicated and embedded in service specifications effectively – this can be done via guidance and training, using a common language.

There are other opportunities to strengthen monitoring and evaluation. Assessing the relative value for money of comparable services would be a worthwhile endeavour, for example. The development of in-depth, long-term studies on the effectiveness of policy and programme changes could also provide real insight into the effectiveness of services funded by Supporting People funding – one example of this is the Secure Anonymised Information Linkage (SAIL) project carried out by Swansea University, which highlighted the positive impact of the Supporting People programme on health service usage. Similar studies could demonstrate the impact of funding on homelessness and social care.

There is also a strong case for a nationally procured consistent database for returning performance data. A benchmarking group could be established, in recognition of the fact that there are rarely, if ever, identical models of service or service specifications.

3. Distribution of programme funding and financial planning

There are a range of issues that need to be considered in developing and implementing any new funding formula. The development of any formula for the distribution of grants should be free of any potentially damaging incentives related to performance measures applied by Welsh Government. There should be a focus on vulnerability, and a recognition of the levels and complexity of overlapping vulnerability.

It should be recognised that the legacy capture under Transitional Housing Benefit (THB) in 2003 was based on need, as THB captured those needing and having support at the time. Some Local Authorities were effective at capturing this – however, citizens in Local Authorities performing less effectively should not be penalised as a result of their LA performance at that time.

Regional Collaborative Committees have received very limited information about Full Flexibilities proposals to date, and as such, it is very difficult to comment on them. Similarly, the current financial worth of each of the proposed grants to be

merged is unknown: it is impossible to establish the impact on SP funded services. A merger of grants at a reduced level could result in market uncertainty and instability. Currently, there is a lack of information available that would enable us to assess the impact on procurement requirements.

It has been suggested that the new budget line indicating the merging of grants is greatly reduced, compared to what it would be if the grants were merged today. We are, therefore, concerned about where the cost of this short-fall will be met, and the implication for service delivery if the funds cannot be found: there may well be a negative impact on service delivery, which has already been affected by budget pressures and funding uncertainty.

The supported housing review has restricted the development of accommodation-based service models, because of the uncertainties surrounding rental income for social landlords. Concerns have been raised by RSLs and third sector providers regarding annual Supporting People revenue settlements: potential cuts have not been communicated clearly, Welsh Government has provided late notifications confirming funding, with commitment only to annual funding and contracts from Local Authorities. This has led to human resource difficulties, with some providers serving redundancy notices to members of staff annually, until funding has been confirmed. Clearly, this can result in staffing retention issues.

There is potential reluctance to commission purpose-built specialist accommodation due to the uncertainty of revenue, and the concerns that landlords have of being left with buildings unsuitable for general needs letting, or which are costly to convert to such letting. Welfare reform proposals might have increased caution around commissioning fixed support provision, due to the effects on rent and service charges. Delivering fixed accommodation-based services, locating affordable and appropriate sites for development, and achieving planning permission for supported living, are all complex aspects of service delivery.

We need to consider the extent to which local and regional planning processes reflect well-evidenced needs, rather than historical patterns.

Some providers are completely withdrawing from providing Support People-funded services, due to the risk to business models. A move to three-year indicative allocation would allow planning and commissioning to factor into service development, and enabling longer contracts to be awarded.

There are several reasons for the identified wide variation in financial support for different client groups across Local Authorities. For example, legacy commitments might exist. Longer term supported living might still have people living in the same homes as they did in 2003. The analysis of the spend plan used does not entirely reflect the intensity of the services used – as a result, like is not being compared with like. Some groups may have a higher intensity, and tend to cost more. The needs of the local population might be different, and to meet those needs, locally determined priorities might be different. These priorities are determined based on a wide range of factors, and may be dependent on what other resources the area has for each category of need.

Likewise, procurement plans within each area and category could be at different stages of implementation. The implementation stage of Aylward's recommendations will have an impact, with a potential move towards generic, multi-specialist or pan-disability type services. Local property prices, salary costs based on local workforce issues, and rural issues such as travel and translation costs can all impact local services.

A similarly varied set of reasons exists for the noticeable change in the overall proportion of programme funds spent on floating and fixed support. The implementation of Aylward's recommendations has seen support classified in spend plans as fixed and sheltered change to OAP or generic floating support. The Social Services and Wellbeing (Wales) Act means there is more focus on prevention and early intervention floating support may be seen as a more complementary model.

Floating support as a model can be more efficient, flexible and effective for some groups, and commissioning decisions may have been made because of this. Fixed support, like supported accommodation, has its own advantages in certain contexts. Models of support that promote the voice of an individual, and a level of choice and control for service users, are of paramount importance.

Legacy patterns are still evident, but as procurement plans are being implemented, these patterns are likely to change. The complexity of change can vary by the service model and client group. The current regional Supporting People plan was developed through a joint review of housing and homelessness data at a regional level; this data was analysed as a whole, so a set of shared high level strategic priorities could be reached. However, all regional need mapping processes are heavily informed by local arrangements. This includes a range of data sources:

census and other population data; homelessness data (including evictions and other reasons for homelessness); analysis from Gateways as to demand for existing services and gaps in services, and client engagement.

Evidencing need could be further developed and refined: the Western Bay Regional Wellbeing assessment has made progress in this, but also recognised the need for improvements. Once need is evidenced for a particular group of individuals, and decisions are made, then the commissioning of housing related support for some client groups could be part of a larger continuum of provision, and part of a wider strategic process – for example, step-up and step-down provision could be part of an accommodation and support pathway.

The development of the new homelessness strategies was a missed opportunity for Welsh Government to formalise and develop this approach further, in a manner that would work consistently across Wales.

4. Conclusion

This document has gathered the concerns and views of members of staff at The Wallich. We appreciate the complexity of the Supporting People programme, and the large number of moving parts that it consists of. We also recognise the difficult financial context of the time, and the specific issues that come from housing being a devolved issue while changes to the benefit system are driven by the UK Government.

That said, Supporting People is vital for a huge number of vulnerable people across Wales; it can also be used cost-effectively, and to save money for other important public services. Changes to it should be carefully considered, and all implications thought through. We hope this contribution highlights some of these implications, and some of the concerns and opportunities that the proposed changes to Supporting People gives rise to.

1. The impact of wider policy developments on the programme including

a) The overall clarity of the Programme's objectives

Since the reconfiguration of the Supporting People Programme Grant back in 2012, following the Aylward Review, there has been a clear shift towards homeless prevention being its key priority. Whilst it is still perceived by many as supplementary service to social care, particularly given the significant financial constraints within the social care sector, the current guidance clearly states that its purpose is to help vulnerable people develop or maintain the skills and confidence necessary to live as independently as possible. In achieving its objective, it has housing, and preventing homelessness or people living in inappropriate institutional settings, at its core.

However, it is our opinion that Welsh Government need to decide whether or not it is their intention to publish the revised Guidance which has been in draft format prior to the publication of the Auditor General's Report. In general, it our opinion that the current revised draft guidance provides greater overall clarity of the Programme's objectives compared to the actual guidance, which remains in use.

b) The implications of, and emerging response to, the UK Government's Supported Accommodation review

Without question, there are considerable risks associated with the Supported Accommodation review, in relation to the financial viability and long term sustainability of temporary accommodation. This has direct consequences for homeless hostels, refuge, designated exempt other properties for vulnerable groups such as those associated with needs attributed to substance misuse, offenders, domestic abuse, and mental health who are currently accorded exempt status. Similarly, risks are also identifiable within specialist accommodation such as Extra Care and Sheltered Accommodation, which are accorded specified status. We feel it is imperative that Welsh Government recognise the risks presented by what is seen as part of the Welfare Reform Agenda which will undoubtedly impact adversely upon some of our most vulnerable citizens, as noted above. A mitigating and fair strategy which is required, to alleviate the risk of exacerbating poverty

levels across all age groups, particularly for 16–21 year olds and the under 35, where the change in Local Housing Allowance rules will present inevitable financial and affordability challenges. Similarly should LHA be applied to Extra Care schemes, it will undoubtedly restrict access to only the most affluent, with the less well-off restricted to more institutionalised options. It is therefore necessary to recognise that a one size fits all approach to this issue is not appropriate, across the UK and that needs across Wales may also differ from one Local Authority to another.

c). How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments

The Welsh Government needs to adopt a more collaborative and co-produced approach which includes all key stakeholders such as Local Authorities, Health Boards, Criminal Justice Agencies, Housing Associations, Third Sector Provider Organisations and most importantly of all, the service users, past and present. Collaborative working and joined up thinking within Welsh Government Departments such as Housing, Health and Social Care needs to be improved to effectively administer and realise the vision contained within the Social Services and Wellbeing Act 2014, The Housing (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015.

The presence of Welsh Government within the RCC meetings has also reduced significantly over recent months. Their previous attendance provided an opportunity for a number of agencies named above to engage in meaningful discussion and allow opportunity to challenge policy and procedures associated above. This opportunity no longer presents itself.

d) How best to align the work of the Regional Collaborative Committees with the other collaborative governance arrangements

It is important that there is improved synergy between other collaborative governance arrangements. A potential improvement on current arrangements would be to establish Smaller Regional Tackling Poverty collaborative groups on a regional basis, which would include Senior Leaders Heads of Services from all sectors etc making key decisions presented to them by working Groups or Sub Groups from the various tackling poverty programmes. This could reduce duplication in investment and time spent with some vulnerable

families/individuals. Furthermore, more efficient use of funding where duplication is reduced would extend provision to those whose needs currently remain unmet.

e) The lessons to be learned from the mixed effectiveness and impact of the regional working over the past five years

From a Supporting People perspective, it is reasonable and fair to assume the establishment of the Regional Collaborative Committee in North Wales has been successful in terms of promoting a more consistent approach where processes are involved. Arrangements have been implemented for the establishment of regional quarterly monitoring form, regional outcomes gathering and analysing, regional needs mapping database, and an agreed Regional Clawback Statement for non-delivery of service as per contract agreement, shared provider forums etc, to name a few. However, whilst this has demonstrated a will to work collaboratively, regional commissioning of service delivery has proved to be a complex issue, due to linguistic, demographic, socio-economic and cultural differences across the 6 North Wales Authorities as well identified local priorities in keeping with the Corporate visions of each individual Local Authority. It should also be noted that North Wales had prior to the compulsory introduction of its Regional Collaborative Committee had a long established Regional Planning Group, where work had already commenced to implement a more consistent approach to administrative processes. Furthermore, the lack of presence from Health and Probation on a regional level would appear to have restricted further progress, particularly in relation to adopting a more collaborative approach.

f) The extent to which the governance and management arrangements for the Programme reflect the ways of working under the Wellbeing of Future Generations (Wales) Act 2015

We recognise that the principle of sustainable development is key to effective delivery in achieving the aims and objectives of the above-mentioned Act and are of the opinion that the summary below demonstrates the extent to date in reflecting the aims and objectives of the Act.

Long Term – Supporting People is seen as a key preventative service aimed at reducing longer term issues and dependency on more costly forms of statutory intervention. Numerous case studies read over the years have clearly demonstrated that timely appropriate and effective intervention can yield considerable savings to the service commissioners whilst improving the lives of some of the most

vulnerable citizens. Our experiences demonstrate that there is a clear will at both local and regional level to ensure that short-term intervention achieves long-term gain, and Supporting People has a key role in ensuring this vision is realised.

Prevention – Supporting People continues to be at the forefront of homeless prevention and will doubtless continue to play a crucial role whilst funding is made available. The programme focuses on a need to provide early intervention in order to negate the need for other types of service provision e.g. statutory intervention. All partners recognise the value of the support and services provided. The recently reconfigured floating support service for people aged 55+ now provides a clear emphasis on prevention of homelessness and empowering the individual to live independently and feel part of the community without a need for any intervention from social care personnel or a need for unnecessary admission to hospital, or residential care.

Integration– Supporting People has on Anglesey worked in conjunction with programmes such as Communities First, and Families First to commission services to meet needs across a range of service users who include Young Vulnerable People, People with Mental Health Needs, People Leaving Prison and those who engage in substance misuse. Services such as building CV's job placements, counselling and therapeutic services that are not eligible for Supporting People Funding has been provided to complement SP commissioned services. Furthermore the Anglesey Supporting People Planning Group have recently integrated services for people with substance misuse and those involved with the criminal justice system, given the strong correlation.

A corporate pilot for the delivery of local asset co-ordination on the Island includes partners from Housing, Social Services and Health, working together on an identified geographical patch covering the Beaumaris area.

Collaboration – The progress achieved by the North Wales Regional Collaborative Committee has demonstrated a resolve and will to work collaboratively. However, there is a need to increase collaboration across other programmes to reduce duplication and utilise available funding in a more targeted and efficient manner.

Involvement – Service user involvement has been recognised as a key priority for development on both a regional and local level. There are regular consultations with service users, i.e. when undertaking service monitoring and reviews, taking part in tender evaluation processes and feeding back via a continuous on-line

service user questionnaire. Take up of the online service has been positive and evidence presented has been used within the decision making process. This includes the decision to procure an ongoing low level floating support service.

2. Monitoring and evaluation including

a) How monitoring / outcome data is used to inform decision making about programme expenditure and contract monitoring

Welsh Government have placed significant emphasis on the data gathered from the Outcomes Framework. As Strategic Commissioners, we fully support the ethos and value of an outcomes framework. However, we have regularly stated that the current outcomes system is unfit for purpose and welcome the proposed changes to the framework. It is reasonable to assume that Welsh Government currently place greater emphasis than Local Authorities / Planning Groups on the outcomes data when making key decisions which impact upon the Programme's Expenditure Levels.

Work undertaken both locally and regionally has resulted in a robust process to gather and monitor data across all projects in North Wales. This includes, throughput, the number being supported quarterly, numbers leaving etc. Equality data is also monitored. The data is analysed regularly in order to ensure contract compliance and that service is providing value for money. Any voids over 10% is clawed back, unless there are justifiable mitigating circumstances. Service user consultations are also used as monitoring mechanisms within Anglesey.

b) The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework

On the whole we feel that this is a step in the correct direction, in that there is a significant shift towards the implementation of a person centred approach within the revised framework. However, we remain concerned that the capturing of outcomes is not a one 'size fits all' methodology. It is our belief that different service user groups will almost inevitably have different aspirations e.g. past experience has indicated that older people supported within the community will want to be made to feel safe and or be assisted to feel physically and mentally healthy. In comparison most young people entering the Supporting People environment will require basic tenancy management and daily living skills. Applying all outcome domains to our service users is not conducive to achieving

positive results which will benefit them in the longer term. It is better to concentrate on those areas which requires prioritising in the initial stages to ensure engagement and build trust. The shift from the current 1–5 scoring mechanism is welcomed. However we need clearer guidance on how the proposed 1–3 category is to be recorded, and more importantly how Welsh Government will interpret them, to make their informed decisions, particularly around future grant funding. Under current arrangements, service users can potentially achieve a score of 5 within a particular domain, but upon the identification of a new aspiration under the same domain, it could result in changing their score for that domain to 1 or 2 for the next reporting period. We have previously queried returns to Welsh Government where it was noted that only scores of 4 or 5 were classified as a positive outcomes, where it is our opinion that any increase in score, constitutes a positive outcome.

c) How any revised outcomes framework arrangements can be best communicated and embedded

Client aspirations would be best addressed by the service users themselves, therefore, it is imperative that their opinions and voices are heard and considered. Providers will also require improved clarity as to what some of the aspirations mean. For example feeling safe is a very open ended issue and could mean whole range of different things to different individuals. It is therefore essential that suitable training is arranged for providers from the outset, and previous lessons learnt from the initial roll-out of the SP Outcomes framework to ensure that a consistent and transparent process is adopted from the outset to enable a fit for purpose framework to be implemented.

d) Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services

Case studies have previously provided clear and tangible evidence of the effectiveness of the Supporting People Programme. Furthermore, cost benefit analysis commissioned to evaluate the SP Programme, along with the publication of regional documents such as the North Wales ‘Our Stories’ booklet (and a similar Gwent version) have highlighted the significant value for money and savings to statutory services such as Social Services, Health and Criminal Justice. Given the advancement in technology over recent years it may be worthwhile considering the development of a spreadsheet / database which Single Point of Access co-ordinators /analyst can utilise when closing cases. The savings achieved via

Supporting People intervention can be directly compared with recognised unit cost of e.g. hospital bed, homeless intervention, criminal justice involvement etc, which probably would have occurred had it not been for the provision of Housing Related Support via the Supporting People Programme. The financial benefit to health related services is rarely acknowledged. There is a need for greater collaboration at local, regional and national level by Health representatives in acknowledging the undoubted cost savings to acute and community health services, as a direct result of the intervention of providers funded via the Supporting People Programme.

3. The distribution of Programme funding and financial planning including

a) The issues that need to be considered in developing and implementing any new funding formula

A new formula needs to be fair and equitable on a national level. Previous attempts to re-distribute funding placed some Local Authorities at a substantial disadvantage. A 23% decrease in funding was implemented over a four year period. This resulted in presenting substantial financial challenges at a time when other budgets were also being reduced by considerable amounts.

A new formula should be based on need and vulnerability in accordance with the eligibility criteria to access Supporting People Services. Factors for consideration should relate to:

- The index of deprivation categories
- % of population in receipt of Universal Credit / Contributory JSA and Contributory ESA
- Number of people at risk of homelessness per 10,000 of the population
- Number of people assessed as homeless per 10,000 of the population
- GDP levels per Local Authority

b) How budget pressures and funding uncertainty have affected service planning and delivery

Annually agreed Grant awards have not been conducive towards achieving the principle of sustainable development which is intrinsically linked with Wellbeing of Future Generations Act, discussed above. Current funding arrangements does not

allow for effective longer term planning and there is constant uncertainty across service providers as to whether funding will be available or reduced year on year. Unfortunately, this creates a negative culture which results in service providers struggling to retain staff they have invested in and is ultimately transferred to the service user who having built a relationship of trust with a case worker, needs to familiarise and repeat the process with another member of staff. Funding uncertainty has also restricted development of new services, for fear of funding being unavailable for newly awarded contracts, particularly within fixed support services.

c) Reasons for identified wide variation in financial support for different client groups across local authorities

The wide variation in our opinion is as a result of multiple factors as follows

Historical Legacy Funding – When Supporting People was first introduced in 2003, a maximising the pot approach was adopted which benefited some LA's more than others, as it was not based upon a needs led approach. This led to a substantial investment in the resettlement of people with Learning Disabilities from institutionalised settings as part of reform under the Community Care Act. Service users were granted assured tenancies in a number of properties and have remained in receipt of housing related support across a number of Local Authorities, with limited potential for independence. Numbers supported have been low with cost high. Locally, we have disinvested significantly within this area since 2012, and the Regional Collaborative Committee have identified Learning Disabilities as key area for development within the next Regional Strategic Plan.

Close working with Social Services – There has historically been a close working relationship with Social Services, with some Local Authorities have managed the Supporting People Programme within Adult Social Care. Investment in older people services, particularly sheltered housing (wardens) and community alarms has also been significant in terms of numbers accessing the service, but reflects an insignificant financial outlay due to the low unit cost levied for community alarm monitoring.

Differing Local Priorities – Each Local Authority is required to deliver against its Corporate Plan. It is therefore inevitable that there will be similarities as well as differing priorities across 22 Local Authorities which will impact on how Supporting People funded services are commissioned and delivered. This will be further

influenced by the 22 Planning Groups, which provide the necessary local governance and accountability on a local level, comprising of Housing, Social Services, Health and Probation.

d) Reasons for the noticeable change in the overall proportion of programme funds on floating and fixed support

We are of the opinion that we have an acceptable balance of floating and fixed support. However, any further provision of suitable and affordable designated properties would always be welcome. Floating support is less problematic in terms of commissioning, and does not involve the need to apportion housing management costs into the overall delivery cost. Furthermore, floating support can be seen as a more proactive support to assist vulnerable people to maintain their tenancies when faced with barriers such as welfare reform which impacts on affordability and the required skills to budget accordingly. Floating Support also promotes a preventative approach where if the support is effective and successful, it can result in negating the need for the service user to present as homeless or at risk of homelessness within the 56 day period as per the Housing (Wales) Act 2014.

In comparison, Fixed Support can be seen as being more reactive to crisis, where people are actually homeless and require considerable skilling, re-skilling as part of an intensive support package. It can also prove problematic in terms of location and can stigmatise particular vulnerable groups more than others. However, there will remain a need for a proportionate mix of floating support and fixed support, to meet the complex needs of an ever changing society.

e) The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical pattern

Both local (Anglesey) and regional (North Wales) RCC adopt a needs led approach to planning, remodelling or commissioning from new where applicable. This is evidenced by robust intelligence gained from, performance management tools and data, benchmarking with other areas, analysis of demographic sources and public consultation exercises to gauge the opinions of potential service users and key partners and stakeholders.

The above mentioned processes subsequently underpin written business cases which if approved result in the development of detailed service specifications

which along with an Invitation to Tender Documents form the basis of a very robust procurement process which is advertised on the Sell2Wales Portal. The commissioning cycle is completed via twice-yearly monitoring reports and 3 yearly service reviews which act as key evidence when considering the need for future service planning and commissioning.

1. The impact of wider policy developments on the programme.

1.1 Flexible Funding – there has been no firm direction from National Government around No Second Night Out or Housing First, there are concerns that when funding goes into one pot, local authorities will not have clear policies that will govern the distribution of funding.

1.2 There are concerns that the inclusion of Supporting People and Homelessness Prevention with predominantly non-housing-related grant streams will dilute focus on homelessness and homelessness prevention – which is a concern given recent increases in homelessness and rough sleeping.

2. Monitoring and evaluation.

2.1 Flexible Funding – given the potential diversity of the funding streams and service areas covered, how will success be measured?

3. The distribution of Programme funding and financial planning.

3.1 There are concerns that if the existing grant ring fencing is removed from 2019 / 20, local authorities may utilise the funding to subsidise other priority areas e.g. Social care and child protection. This will undermine the positive outcomes already achieved and risk regressing the programme.

3.2 Previous funding formula proposals have had an adverse effect on local authorities in North Wales, with all 6 authorities potentially losing significant amounts of funding. Rurality and language have never been recognised as issues that need to be acknowledged in any formula. However, these have a significant effect on the cost of service provision in North Wales.

3.3 How can the Regional Collaborative Committee develop regional services, if local authorities are making the best use of funding at a local level through flexible funding? i.e. anticipated that all allocated funding will be utilised locally and therefore no funding available for regional projects.

1) The impact of wider policy developments on the programme including:

The overall clarity of the of the Programme's objectives:

The implications of, and emerging response to, the UK Government's Supported Accommodation Review; Detailed recommendations in the UK SAR apply to England only, so it is difficult at this stage to assess the potential impact of the SAR in Wales. In theory, the move from HB to grant funding is a positive one, removing the issue of short-term supported housing being beyond the means of people not in receipt of HB, due to the higher costs associated with this type of accommodation. However, the move will take another funding stream away from providers and into the control of local authorities. Where the funding sits within LAs and how this is ring-fenced, managed and administered will be of upmost importance to ensuring the housing needs of vulnerable people are able to be met. In England, where SP is no longer ring-fenced, it appears that some providers are already expressing concern at how robust the ring-fence on the proposed short-term housing grant will be in the longer term.

How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments; More timely communications about developments and priorities would make local authorities and service providers better able to plan ahead. Better communication between WG departments, ensuring a more consistent message to local authorities and providers, would also be helpful.

How best to align the work of Regional Collaborative Committees with other collaborative governance arrangements; This will be very much dependent on the outcome of Flexible Funding proposals.

The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years; A well-established RCC in North Wales has enabled some positive progress with regards to regional working; however, there remains significant barriers to further success due to the variances in the application of Financial Regulations across LAs.

2) Monitoring and evaluation including:

How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring; Our regional Performance Monitoring Returns serve us well to be able to monitor spend and claw back where required. The Outcomes data, as has been identified, is less useful in its current format; there is much room for subjectiveness in recording the data. The move towards a national outcomes database would be welcomed.

The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework; We welcome the opportunity to comment on the proposed changes as they develop, however, they do seem very draft at present and we would welcome further opportunity to be consulted as the Framework develops.

How any revised outcomes framework arrangements can be best communicated and embedded; A National Database to remove some of the inconsistencies and subjectiveness in recording

Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services; The new draft guidance seems to move away from benchmarking of costs; this will make the VFM assessments of comparable services potentially more difficult. Some clarity and further guidance around the funding and modelling of services would be welcome if we are expected to be scrutinised for our monitoring here.

3) The distribution of Programme funding and financial planning including:

The issues that need to be considered in developing and implementing any new funding formula; Homelessness and rough sleeper figures across LAs

How budget pressures and funding uncertainty have affected service planning and delivery; Budget pressures and funding uncertainty have had an adverse effect on service planning and delivery. Service providers have worked effectively with the Council to find innovative solutions and efficiencies, but constant pressure to 'do more with less' eventually takes its toll. The withdrawal of other funding such as Communities First, and the present uncertainty around the future of other funding including Supporting people has already led to the loss of some services and places a strain upon working relationships between local authorities and providers.

Reasons for the identified wide variation in financial support for different client groups across local authorities; This may in part be explained by the fact that there is no typical SP service provision. Even within client groups, levels of need and hence level /intensity of support may vary, and service costs will vary.

Demographic variations between local authorities will mean that some local authorities have higher concentrations of particular client groups, or clients with higher or lower need levels, than others. Since SP is led by, and responsive to, need this will inevitably lead to variations in financial support for different client groups across local authorities.

Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support; Potentially due to lack of clarity over definition – this is not made easier in the draft guidance.

The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns; Needs mapping data has not provided a robust data source for future service planning; this has tended to report what service delivery is happening rather than gaps in service provision. Homelessness statistics are more useful.

Introduction & Summary

This response complements our response to the WAO report¹

Supporting People (SP) is Welsh Government's primary funding stream for housing related support (HRS) and, through this, makes up the majority of the Welsh Government's funding for preventing homelessness and supporting people, both older and working age, to live independently in their own homes. 60,000 people are supported each year in Wales through services funded through the programme, many of whom would be likely to face homelessness otherwise.

CHC's members directly deliver the full range of fully and partly Supporting People (SP) funded services including, but not limited to:

- Fixed site supported accommodation including homelessness hostels, women's refuges and accommodation for people with learning, physical and mental health issues.
- Floating support for people living in general needs accommodation.
- Sheltered and Extra Care accommodation for older people, reducing the burden on social care.

In addition, CHC members provide housing stock to other providers of SP services. In total, CHC members provide 55% of the 38,500 units of fixed site supported accommodation in Wales.²

SP is well established as a preventative programme, showing savings of £2.38³ up to £2.99⁴ to the public purse for each £1 spent. In a time of austerity and overall budgetary pressure, it is vital to continue funding for preventative funding streams

¹ [https://chcymru.org.uk/uploads/events_attachments/Community_Housing_Cymru_Brief_Response_WAO_SP_Report_\(002\).pdf](https://chcymru.org.uk/uploads/events_attachments/Community_Housing_Cymru_Brief_Response_WAO_SP_Report_(002).pdf)

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/572454/rr927-supported-accommodation-review.pdf (p37)

³ <http://online.fliphtml5.com/jtyt/ssff/#p=1> ((p2)

⁴ https://thewallich.com/wp-content/uploads/2017/09/Support_that_Saves.pdf

such as SP, to relieve pressure on other budget lines. In addition, the SP programme aligns well with the preventing homelessness objectives of Welsh Government and with at least five of the seven goals under the Wellbeing of Future Generations (Wales) Act 2015.

SP provides the vast majority of support funding for homelessness accommodation accessed as a result of the measures laid out in the Housing (Wales) Act 2014. Additionally, through the funding of the support element of women's refuges, SP also supports Welsh Government in fulfilling its responsibilities under the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

Through supporting families and young people moving towards starting families, both through floating support and through specialist fixed site supported accommodation, SP plays a vital role in tackling Adverse Childhood Experiences (ACEs) from occurring. Examples include Nightingale House, a family hostel run by Cadwyn Housing Association in Cardiff.⁵ SP also funds housing related support services working to ameliorate the downstream effect of ACEs on vulnerable adults.

The cost savings to many currently Welsh Government funded public services are clear, most notably savings to NHS, community safety and social services budgets⁶. However, with the proposed devolution of housing costs funding for short term and emergency supported accommodation in 2020⁷, the potential cash savings on other Welsh budget lines is set to increase. SP services work to prevent homelessness, and through this relieve pressure on crisis accommodation such as homelessness hostels, for which the housing costs element of funding is set to be devolved.

Due to the distinct nature of SP in funding housing related support services, CHC is calling for Supporting People to remain as a distinct budget line, separate to the proposed Early Intervention, Prevention and Support Grant proposed by Welsh Government from 2019/20. This will reduce uncertainty caused by the devolution of housing costs for short term supported accommodation from April 2020 and safeguard services.

⁵ <https://www.cadwyn.co.uk/success-as-nightingale-house-resident-moves-into-own-home-after-receiving-support/>

⁶ https://thewallich.com/wp-content/uploads/2017/09/Support_that_Saves.pdf

⁷ <https://www.gov.uk/government/publications/funding-for-supported-housing>

Any future grant realignment should consider the different funding approaches of grants such as the Supporting People, Homelessness Prevention Grant and yet to be devolved grant for housing costs, which deliver housing related support, compared to other tackling poverty schemes such as Families First and Flying Start.

The impact of wider policy developments on the programme

- **The overall clarity of the programme's objectives**

The objectives of the Supporting People (SP) programme are clearly aimed at preventing & tackling homelessness and supporting people to live independently in their own homes. The additional objectives could be grouped under the two aforementioned overarching objectives. It is therefore clear that the Programme's primary aim is to provide housing related support for vulnerable people in Wales, with the outcome of preventing people becoming homeless, supporting people back into housing if they do, and supporting people to live independent, fulfilled lives in their homes. CHC believe that the clarity of the programme's objectives could be improved through the explicit mention of providing housing related support.

- **The implications of, and emerging response to, the UK Government's Supported Accommodation review**

The current UK Government proposals for funding housing costs (rent and eligible service charge) in supported accommodation will have a significant impact on the funding landscape for supported housing in Wales from the proposed implementation date of 2020. The proposed future funding model is tripartite, with separate funding models for short term supported accommodation; long term working age supported accommodation; and sheltered and extra care. The greatest implications of the UK Government proposals on the SP programme are in relation to short term and emergency supported accommodation⁸ and our response to this question will focus on this area.

From April 2020, it is proposed that funding for the housing costs of residents in short term and emergency supported accommodation will be devolved to Wales. The funding quantum will most likely be upwards of £70m per year and replace the withdrawal of Housing Benefit (HB) from around 2500 units of short term and emergency supported accommodation in Wales, an estimation undertaken using

⁸ https://chcymru.org.uk/uploads/general/In_Depth_Supported_Accommodation_11-17.pdf

the proposed definition of short term and emergency supported accommodation⁹ and the unit type breakdown collected under the Supported Accommodation Review¹⁰. As mentioned, short term and emergency supported accommodation includes homelessness hostels, womens' refuges and other crisis or transitional accommodation.

Almost all of the 2500 short term supported accommodation units mentioned above are in receipt of SP funding for the support they deliver as part of the supported accommodation residency. Housing Benefit, later the devolved fund from 2020, and SP make up the majority of these units' funding. The removal, or serious diminution of either of these two funding streams would seriously reduce the efficacy of accommodation and ultimately make it non-viable, leading to closure. Therefore, both SP and the new devolved funding stream are vital to the continued provision of services tackling homelessness and domestic abuse in Wales.

Currently, providers of short term and emergency supported accommodation in Wales face dual uncertainty. Support funding is uncertain from April 2019, due to the proposed loss of the Supporting People ringfence. Compounding this, there is considerable uncertainty over housing costs (rent & service charge) funding from April 2020, due to proposed UK Government reforms.

To reduce uncertainty, CHC are calling on Welsh Government to postpone the re-alignment of tackling poverty grants and to retain the ring fence and separate budget line for Supporting People until April 2021, to allow the new funding model for housing costs in short term supported accommodation to become established. This would also give time for a wider consultation around tackling poverty grants and which grants would best align.

- **How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments**

Over recent years, communication between Welsh Government (WG) and the Regional Collaborative Committees (RCCs) has deteriorated significantly. This has manifested itself most clearly in the lack of WG staff presence at RCC meetings,

⁹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/655990/Funding_supported_housing_-_policy_statement_and_consultation.pdf (p23)

¹⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/572454/rr927-supported-accommodation-review.pdf (p42)

due to staffing pressures within Welsh Government. Therefore, a vital link has been lost between WG and RCCs and the RCCs are to some extent relying on their own ability to collect information on priorities and the impact of wider developments. Priorities are communicated to RCCs in writing, but this is a weak substitute for attendance at meetings.

- **How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements**

Regional Collaborative Committees (RCCs) are a vital section of the governance of the Supporting People (SP) programme, working to drive regionalised commissioning and improve service provision and efficiency. However, the non-statutory nature of the RCCs has held them back from achieving their full potential, in comparison to the statutory nature of the Regional Partnership Boards (RPBs) and Public Service Boards (PSBs). Placing RCCs on a level footing with other regional arrangements is vital to their success.

Interaction between RCCs and RPBs is vital to bringing together health, social care and housing related support services. Placing RCC member(s) on RPBs and PSBs would improve understanding between the various regional bodies. In addition, creating statutory membership for health boards on RCCs would improve links between health and housing related support, a vital link to prevent bed blocking in the NHS among other issues. However, it is important to note that PSBs are not truly regional, unlike RCCs and RPBs. This also needs to be considered.

- **The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years**

RCCs tend to operate well where their constituent local authorities already have good working arrangements. Areas such as Gwent RCC are a good example of this, where there is a high level of buy in from the local authorities in the area. This stems from an understanding of the purpose of an RCC in driving regional commissioning and is therefore vulnerable in areas where local authorities are not traditionally versed in regional working.

Where regional working arrangements are less effective, RCCs would be assisted by being placed on a statutory footing, with increased oversight over commissioning of services.

- **The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Wellbeing of Future Generations (Wales) Act 2015**

Long Term – Current SP funding settlements to local authorities are annual, this only allows local authorities to issue short term contracts to providers, leading to an inability to plan and deliver projects looking at the long term. Although SP is currently designed to provide short term interventions, it is a funding stream utilised to provide medium term support and would therefore benefit from longer term funding settlements. Additionally, SP providers would benefit from longer term funding settlements, allowing increased efficiencies. Staff members would also be provided greater security of employment.

Integration – Lack of a statutory footing for RCCs and a power balance in favour of local authorities has led to a lack of integration of services such as health, social care and housing related support.

Prevention – SP has a long and established record in preventing homelessness and reliance on other Welsh Government and UK Government funded services such as NHS, social care and criminal justice. Studies have found a saving of between £2.38¹¹ and £2.99¹² per £1 spent.

Collaboration – Individual services collaborate well with partner services. In addition, services utilise multiple funding streams well to deliver holistic services to people. For example, services utilising Homelessness Prevention Grant to support people off the street and SP to help keep them off the streets.

Involvement – SP has well established credentials in service user involvement in service design. The majority of individual service embrace co-production including service users on interview panels for staff, project committees and involvement in the governance of the organisation. At a regional level, there are examples of excellent engagement with service users, including the Gwent Service User Website¹³. However, there is regional and local disparity in the quality of involvement and engagement and best practice should be embraced across Wales.

¹¹ <http://online.fliphtml5.com/jtyt/ssff/#p=1> ((p2)

¹² https://thewallich.com/wp-content/uploads/2017/09/Support_that_Saves.pdf

¹³ <https://www.gwentsupportingpeople.co.uk/en>

Monitoring and evaluation

- **How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring**

Outcomes are vital to ensuring that the SP programme is achieving its intended aims and objectives. However, there is significant variation in the collection and use of monitoring/outcome data across different local authorities and between regions. It is felt by some service providers that outcomes monitoring is being led by legal/procurement departments within local authorities, in order to monitor contracts from a cost perspective, rather than by SP teams in order to use the data to improve services and commissioning decisions. Service providers feel that it is unclear how outcomes data is being used by local authorities and that there is a wide discrepancy in how heavily outcomes returns are being scrutinised by different local authorities.

- **The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework**

CHC members are broadly happy with the proposed outcomes framework. However, as mentioned above, it is the implementation of the framework that is all-important.

- **How any revised outcomes framework arrangements can be best communicated and embedded**

All future outcomes framework need strong, and as far as possible exhaustive, guidance in order to standardise practice across Wales as far as possible.

- **Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services**

It is impossible to fairly compare services in terms of pure value for money. An example of this is where two services looking almost identical may be based in buildings of differing ages, and therefore hugely varying maintenance costs. Simply comparing unit cost would therefore be a very unsuitable way of comparing performance of the two services. Strong outcomes monitoring should provide adequate data with which to assess different services, although direct comparison of services will never be suitable.

The distribution of Programme funding and financial planning

- **The issues that need to be considered in developing and implementing any new funding formula**

CHC believe that the current distribution formula should be maintained close to its current arrangement until 2021, at which point the devolved fund for housing costs in short term supported accommodation will have been implemented and support/housing funding can be considered holistically.

- **How budget pressures and funding uncertainty have affected service planning and delivery**

Although the proposal is only a few months old, the funding uncertainty created by the UK Government proposals for housing costs in short term supported accommodation from April 2019 has caused unease in the sector around development and refurbishment of some supported accommodation.

Annual funding settlements to providers can lead to significant human resource issues around short term contracts, staff retention and redundancy payments. Indicative three year allocations would alleviate this issue by allowing providers to better plan for the future.

- **Reasons for the identified wide variation in financial support for different client groups across local authorities**

The underlying reason for wide variation in support for different client groups across different local authorities is the differing needs of the local populations. For example, areas such as Cardiff tend to attract individuals who are rough sleeping, and therefore a significant spend is made on fixed site short term supported accommodation compared to other local authority areas. However, SP is directed as the local authority sees fit and is therefore liable to be influenced by political pressure to support certain client groups. This is another area in which strengthening regionalisation would reap benefits.

- **Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support**

Fixed site and floating support are both vital services provided for through the SP programme. Different people require differing support depending on their needs.

However, floating support has been favoured over fixed site accommodation in recent years for a number of years. This has been due to a number of reasons.

Firstly, floating support tends to be cheaper to deliver per unit of support than fixed site accommodation and can therefore be deployed as cost saving alternative to fixed site, even where fixed site support may be more appropriate.

Secondly, the Aylward review has been widely implemented in terms of the removal of fixed site support in sheltered housing, replaced with floating support. The impact of this has been mixed but it has certainly increased the ratio floating support:fixed site.

Thirdly, floating support can be seen as less risky than fixed site to commissioners. Should funding diminish, a floating support contract can be slimmed down or terminated without significant consequences in terms of assets. Where a fixed site contract is awarded, particularly where a specialised building such as a hostel is used, the termination of said contract has disastrous consequences for the holder of that asset.

The mix of floating support and fixed site accommodation should be based on people's needs, not solely on financial pressures.

- **The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns**

Overall, there is a feeling that spend does reflect evidenced need. However, historical patterns are still evident across Wales. Further advancements in matching spend to need could be made through stronger guidance from Welsh Government in terms of developing and implementing needs assessments and through strengthening the RCCs to scrutinise the needs assessments.

Conclusion

The Supporting People programme is vital to achieving numerous Welsh Government priorities including tackling homelessness and preventing domestic abuse, in addition to building a fairer Wales for the future. It is not a perfect funding stream, but as we have seen in England, the removal of the ring fence could have disastrous consequences for the support provided to 60,000 vulnerable people across Wales.

CHC understands the drive to align funding streams to produce better outcomes for the people benefitting from services, but we urge caution considering the material change to funding for short term supported accommodation caused by the proposed devolution of housing costs for short term supported housing from April 2019. Therefore, we believe it would be prudent to delay the inclusion of the Supporting People Programme Grant with any other grants until 2021. At this point, regard should be given to which grants Supporting People aligns with best, as it is a housing related support grant, and may sit better with some tackling poverty grants than others.

1. The impact of wider policy developments on the programme:

1.1 The overall clarity of the Programme's objectives:

1.1.1. These are not as clear as they could be, although recent WG information and guidance does stress the major contribution the Programme makes to the homelessness prevention agenda and legislation. SP is one of the most cross-cutting programmes ever introduced by central government and carried on by the Welsh Government. It is primarily a housing/homelessness programme, included in the Housing (Wales) Act 2014, which seeks to enable vulnerable people to access and maintain accommodation based on their housing-related support needs.

1.1.2. But the programme is expected to make a contribution to wider policy developments through: other pieces of legislation e.g. welfare reform, SS&W (Wales) Act 2014, VAWDASV (Wales) Act 2015, WoFG (Wales) Act 2015, Equality Act 2010 etc.; strategies e.g. substance misuse, re-offending, mental health, dual diagnosis etc.; agendas e.g. ACEs, tackling poverty, early intervention and prevention etc.. As such it has lost its identity/real purpose and this needs to be re-defined and promoted.

1.2. The implications of, and emerging responses to, the UK Government's Supported Accommodation Review:

1.2.1. The changes announced by UK Government to keep funding within the welfare system for retirement housing for the elderly and long-term housing has been welcomed by the supported housing sector across the UK. However, funding for short-term, traditional supported housing will be devolved to WG as a lump sum to be included in the settlement from 2020/21, a year later than originally planned.

1.2.2. Options include transferring the funding and implementation to local government which have the governance structure, systems, processes, capability and audit already in place to administer the 'grant'. It would make sense to amalgamate SPPG with this funding for accommodation-based schemes, provided

adequate funding was made available each year and, if required, 'new burdens' funding for the administration costs.

1.2.3. The funding could be put back into Council Housing Benefit departments which will now continue to provide this service for sheltered and longer-term accommodation. However, to achieve better value for money it would be better placed in the Supporting People arena and managed by the Supporting People Teams to assess real total premises/scheme costs. This would also enable a more strategic overview of services as is being envisaged in England (re-inventing Supporting People) e.g. audit total scheme costs, cross-subsidy issues etc.

1.3. How the Welsh Government might improve communication about priorities for the Programme and the impact of wider developments;

1.3.1. Improved communication can be achieved by: having clear, unambiguous priorities for the Programme; guidance and Terms & Conditions of Grant which reflect these priorities and what are not priorities/eligible; easy to read and navigate WG, LA and partner websites; WG inter-directorate meetings/briefings; better links with Health at a senior level; WG attendance at relevant meetings, conferences, forums etc.; capacity of SP Teams to be able to also attend meetings etc.; publicity campaign; WG SP Bulletins are good, if over-long, showing the complexity of the programme and a greater use of social media.

1.3.2. The Welsh Government needs to be more open and transparent concerning major changes to the Programme and consult widely before implementing what could be significant adverse changes. This is evinced by the recent 'Supergrant' or Funding Flexibilities debate which seems to have been conducted behind closed doors between senior officials of the WG and WLGA without the cognisance of the four local Programme managers/fund managers. This, combined with the apparent disappearance/volte-face of SPPG as a budget line from the 2019/20 Welsh Government budget has led to widespread fears and concerns across the sector, especially in relation to schemes that rely on capital expenditure as well.

1.4. How best to align the work of the Regional Collaborative Committee (RCC) with other collaborative arrangements;

1.4.1. A number of issues are mitigating against this happening especially 'funding flexibilities' as this will be prioritised across/within each LA rather than regional issues. Internal mechanisms for governance/oversight of this exercise will need to

be sorted out e.g. would the 'super grant' be approved/audited by the local Public Service Boards, regional PSBs, RCC or Regional Partnership Boards? What role would local SP planning groups and Cabinet Members have in this new proposal? What if there is conflict between RCC/Regional priorities and local priorities?

1.4.2. In Gwent there are two Funding Flexibilities 'pathfinder' local authorities out of the five authorities in the region which will mean that most energies will be spent during 2018/19 discussing, debating and arguing between each Programme at a local level rather than regional issues. This is compounded by the fact that a number of schemes are 'cross-authority' with lead authorities holding the contract, it is difficult to see how this will pan out if priorities change locally or funding is moved to another programme/s from SP. This could make some regional schemes unviable.

1.4.3. Over the years the Gwent RCC has aligned itself with a number of regional collaborative arrangements including the Substance Misuse Area Planning Board, Office of the Police and Crime Commissioner/Safer Gwent, Regional Partnership Forum, ABUHB In One Place initiative, Gwent Social Services Transitional Team, regional housing market assessments, Regional Homelessness Plan, VAWDASV Team and strategic planning, Gwent Regional Providers Forum.

1.4.4. The removal of SPPG/SP as a distinct budget line in 2019/20 is a real worry for the sector as a whole, not least that SPPG funding was agreed to be protected for the next two financial years in the recent WG budget 'deal'. SP works with a number of 'unpopular' client groups and there is a fear that services for children will take priority. This whole initiative has been clouded in secrecy, deals done behind closed doors between senior officers and officials which goes against the current maxims of open and transparent government and consultation. Such an important and massive change should not have been implemented in this way and have been conducted in a more open, consultative and collaborative way.

1.5. The lessons to be learnt from the mixed effectiveness and impact of regional working over the past five years.

1.5.1. Working with colleagues on a regional basis has been pioneered in Gwent since 2002 when the first SP officers employed under 'new burdens' funding were almost forced to work collegiately to develop the programme, often in the early days as 'lone workers'. This was given an extra push when the mantra from Welsh Assembly Government was to 'maximise the (THBs) pot'.

1.5.2. This led to a massive increase in Housing Benefit claims due in no small part to creative/innovative schemes developed by lead officers across regions/Wales. Gwent teams went on to harmonise paperwork and processes for teams and providers, reviews and monitoring arrangements and employ a regional development officer to enhance the programme's cross-authority work.

1.5.3. A number of good outcomes ensued: establishing a multi-agency regional planning group, identifying gaps in provision and jointly commissioning/funding projects, getting better VFM from providers. Separate officer groups were also set up around planning and data, contracts and monitoring etc. but all was put on hold with Aylward. This had the effect of curtailing developments, replacing a tried and tested governance structure with a more bureaucratic process that has delivered less. We were victims of our own success!

1.5.4. Another consequence was that other areas were forced along this new way of working and 'blamed' Gwent for this upheaval. 'Regionalising' quite different LAs e.g. Cardiff and the Vale of Glamorgan was never going to be easy with its different demographics, political power etc. Aylward was right to recommend that local strategic planning arrangements should be implemented/strengthened BEFORE moving to a regional structure and now SP would have been more embedded within the LSBs (now PSBs) if this had happened i.e., a more strategic approach rather than the 'forced marriage' of the RCC.

1.6. The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015 (WoFG Act);

1.6.1. Collaboration, co-production and sustainability, core themes of the WoFG Act, are stymied by annual funding, piece-meal planning and lack of joined-up strategic working across partners. Funding Flexibilities impact has yet to be analysed but likely to impact negatively on regional collaboration at the expense of more local collaboration in delivering local Well-being Plan priorities.

1.6.2. This is symptomatic of the approach to the Programme taken by those who devise change i.e. let's shoehorn SP into other agendas, strategies, priorities without thinking about what the Programme is fundamentally about i.e. housing, housing-related support and the prevention of homelessness.

1.6.3. The supported housing sector was born out of the Housing (Homeless Persons) Act 1977 which resulted in funding for non-statutory single homeless people and childless couples via hostels, refuges etc., this should not be forgotten. Yes the Programme will contribute to the wider WoFG priorities and objectives along with specific projects developed by local authorities but this should not deflect the sector from its everyday important work which may not align itself with all the WoFG Act's objectives.

2. Monitoring and evaluation including:

2.1. How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring;

2.1.1. NCC use a partnership approach with very regular meetings with contracted partners informed by invoices, schedules, SP Pricing Policy, SP8 project finance forms, GNMEs (needs mapping forms), Abritas referral and process information/reports, outcomes data etc. Re-modelling and re-pricing before decommissioning and re-tendering. Outcomes are checked against individual support plans in reviews, alongside service-user and ex-service-user interviews.

2.1.2. In addition periodic fuller reviews are conducted with recommendations and action plans followed up in the regular partnership meetings. All decisions on funding are approved by the SP Planning Group with regular updates on expenditure, underspend and progressing schemes 'off the shelf'. All de-commissioning decisions are approved by the SP Planning Group as well as any remodelling of schemes. The SPPG Spend Plan is approved by the SP Planning Group and Cabinet Member prior to RCC approval.

2.2. The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework;

2.2.1. There are concerns that reducing the number of steps from 5 to 3 will result in a meaningless process as nearly all scores will be in the muddled middle giving no degree of real progress (or decline). Outcomes should also be read/analysed in conjunction with better use of case studies, exit interviews/forms, review interviews with service users, ex-service users and stakeholders, the Improving Lives document – a cost-benefit analysis, Cap Gemini report etc.

2.2.2. The current system is not perfect but is at least attempting a difficult task in representing a person's journey through support intervention/s over time. Yes it is

time-consuming for all involved in the data-inputting, collation and analysis but that could be improved with better on-line IT/software packages e.g. a portable 'App'.

2.3. How any revised outcomes framework arrangements can be best communicated and embedded;

2.3.1. It has to be credible, easy to read/understand, and have appropriate resources behind it, e.g. SAIL. Use of conferences, documents, local sessions, good guidance/manuals, use of social media. Get SP teams up-to-speed first to cascade the same/consistent message to providers across Wales. SP teams regularly offer training sessions to providers on the framework, especially as staff change. This has staff capacity issues for all so new burdens funding should be considered.

2.3.2. Develop good IT systems, databases that are user-friendly and available on-line (cloud). Develop a reliable APP for use on laptops, tablets and SMART phones so that information can be inputted at the support session and signed off by both the service user and support worker immediately and down-loaded onto the system.

2.4. Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services;

2.4.1. SP teams have developed many versions of cost calculators, SP Pricing Policies, so officials and external agencies need to talk to SP Teams to see how VFM has been achieved through the application of the above along with the re-modelling of schemes, mergers, re-pricing etc.

2.4.2. Caution is needed here as you have to measure/compare very similar/like-for-like services and not just use simple comparisons like one client group or floating support as there are many shades of support, level of support, specialisms, economies of scale, rurality/travel etc.

3. The distribution of Programme funding and financial planning;

3.1. The issues that need to be considered in developing and implementing any new funding formula;

3.1.1. Agree variables/criteria and weighting to be used but must have a homelessness factor, poverty factor, health factor as well as pure demographic

data and other data sources. Has to link to purposes of the grant, grant conditions, guidance and local needs mapping.

3.1.2. This issue will be made more complex with any implementation of flexible funding, the outcome of the Supported Housing Review and general cuts to programmes and local authority funding. Any change to current levels of SP funding will have a knock-on effect on the flexible funding regime and could lead to a reduction in fixed-site supported accommodation projects, development blight as housing association partners are scared off funding new schemes when revenue funding is not secure (25 year mortgages/rent streams). Aversely, more funding could be swallowed up/be diverted to the other programmes or pseudo-statutory services to shore up cuts to local authority services.

3.1.3. Whatever new scheme is implemented it must be done in a phased way to minimise disruption to existing services and service users. There will be casualties, schemes will close, smaller specialist providers may go out of business and the good reputation of the Programme built up over many years will suffer.

3.2. How budget pressures and funding uncertainty have affected service planning and delivery;

3.2.1. Effects include: LA cuts to staff/teams, not replacing staff, pressure on homelessness, social care, DToC figures, ageing and unhealthier/more disabled society, welfare reform lack of increase in income, insecure jobs, zero-hour contracts, high staff turnover as services are squeezed, Brexit, quality and pay staff well but less services conundrum?

3.2.2. The annual grant mitigates against strategic planning, limping from one year to the next with the fear of accruing underspends = potential claw-back from WG. Pilots leave staff unsure of continued employment and leave early, can't replace staff in time = claw-back.

3.2.3. Funding Flexibilities, combined with the disappearance of SP/SPPG as a separate budget line in 2019/2020, despite WG assurances, will exacerbate problems and lead to a climate of uncertainty, development blight, housing associations pulling up the development drawbridge, not offering re-modelled schemes for alternative use and SP funding being syphoned off for non-housing-related support activity/schemes.

3.2.4. A three-year secure budget is needed for the sector to be able to plan strategically within that funding envelope and it is ironic that, just as England has recognised its folly in not keeping the ring-fence on SP funding which has led to a decimation of services, Wales is contemplating removing the ring-fence on SP for the sake of perceived/notional administrative savings.

3.2.5. Lumping SP in with children's programmes is hard to understand, what is the rationale for this change? Where was the consultation? Why were programme leads kept in the dark and still not privy to the content of the bids/expressions of interest? Funding is more likely to go to children's services than 'unpopular' client groups that the sector has worked hard to develop over many decades. Local authorities would not have developed these schemes out of choice, no it has been the supported housing sector that has achieved this position.

3.2.6. The sector is not averse to change that has been evidenced, consulted on and refined. There is a natural synergy with some of the proposed grants lumped together in the proposed 'supergrant'. For example homelessness grant and Rent Smart grant and to a lesser extent Communities First legacy funding particularly now that the SP Programme will continue to work on financial inclusion matters/the welfare reform agenda.

3.2.7. It would be better if these housing/welfare grants were aligned with SP rather than children-focused grants as it has to be remembered that the Programme is concerned with supporting people over 16 years old, but the great majority of work is focused on people over 24 years old, the elderly and people with care needs.

3.2.8. In addition, it is unclear whether the recent announcement from the First Minister of an additional £10 million homelessness grant for young people in 2019/20 would be included in the Early Intervention and Prevention/super grant pot. If this funding is not continuous revenue funding (year-on-year funding) it is likely that follow-on funding would be sought from Supporting People Programme grant, as has been the case with schemes developed under the homelessness New Burdens funding which have been picked up by SP following the phased reduction to zero funding for this grant.

3.2.8. A general impact assessment has not been published on these changes neither an Equalities Impact Assessment. These changes could have a real negative

effect on some client groups covered by the Equality Act's protected characteristics and lead to potential challenge.

3.3. Reasons for the identified wide variation in financial support for different client groups across local authorities;

3.3.1. Some reasons: Historical legacy; Unrealistic/different Housing Benefit claims submitted under the THB scheme; subsidizing of social care/services and varying degrees of success in re-allocating resources. Where SP is located in LA structures can produce a different emphasis on services developed. Steer/influence from planning groups, members, council priorities, strong/influential local voluntary sector staff, SP lead officer personality/drive to change. The failure of some LAs to max THB pot/recognise the opportunity, failure to develop schemes under Section 180 funding, political interference/objections. (Wrongful) The (wrongful) use/non-use of 'new burdens' funding to enable the building of strong SP teams. The failure to obtain a higher profile for the programme locally. The evident inexperience of LA staff in this area at the start of the programme in 2000/2001. The stop-start implementation of the distribution formula exercise.

3.3.2. Fixed support schemes are still there but may have been over-funded (THB 'top-up') or re-modelled to floating support (non-resident visiting support) e.g. sheltered housing, supported living, *extra* Care housing. It is easier to commission and de-commission floating support services as it takes a very long time to develop a new supported housing scheme, sourcing capital funding problems, SHG priorities for the elderly, families etc. Pilot SP schemes (off the shelf schemes) that use underspends are nearly all floating support. Re-modelling schemes creates 'resettlement' support rather than lose funding.

3.3.3. Some fixed schemes are past their 'sell-by' date and are not fit for purpose e.g. some old refuges/shared schemes and have been de-commissioned, sold off or returned to general needs housing. Properties owned outright by providers (non-SHG funded schemes) mean the owners can do as they wish and sell. Levels of funding for fixed schemes may have gone down following and assessment of housing-related support need for the individuals and the reduction in funding picked up by social services and/or health.

3.3.4. The use of different value-for money assessments carried out by SP Teams across Wales i.e. cost-calculators or SP Pricing policies will produce a variation in funding between client groups and across different services. Those councils that

have lost out due to cuts AND the distribution formula may pay less to certain client groups than others or cut funding altogether.

3.3.5. Some SP teams/councils have bitten the bullet on over-subsidizing certain client groups with SPPG funding i.e learning disabilities whilst others have not due to political pressures as it is acknowledged that any shortfall would have to come from social services funding adding to council budget pressures.

3.4. The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns.

3.4.1. Nearly all NCC schemes have been re-modelled since 2003 based on emerging need e.g. complex needs, greater independence, rough sleepers, refugees, welfare reform etc. Gwent SP teams have a proven, robust planning process involving a wide range of stakeholders and service users. Intelligence gathering can always be improved but we have to remember that we are in the business of housing-related support not health, therapeutic services, mini-secure units, befriending services etc.!

3.4.2. The planning process includes: analysis of Gwent Needs Mapping Exercise forms, referral forms, Abritas housing and homelessness information, Welsh Index of Multiple Deprivation LSOA data, Daffodil data SAIL data, Public Health Observatory data, Population Needs Assessment data (Gwent Social Services), ONS data and reports, substance misuse data, NOMS data, PSB ward data, review data and information from stakeholders, staff and service users (including ex-service users), regular partnership meetings/contract compliance meetings, monitoring data including invoice and schedule data, emerging regional data and information on needs from regional SP colleagues, SPPG Project Proposal forms, SP Planning Group meetings, Cabinet Member briefings and Local Commissioning Plans and approval feeding into the Regional Strategic Plan.

3.4.3. The above robust planning process clearly shows the detail that goes into determining the major changes in services across the region from the historical legacy position in 2003. All NCC schemes have been re-modelled or de-commissioned to reflect identified need, over-supply or the lack of need for particular client groups/schemes.

3.4.4. Funding is targeted to those in most need on an individually-assessed basis through our Gateway referral and assessment process that has seen a steady

increase year-on-year in the number of people supported and a greater throughput/churn of service users.

A final word. The WAO report based a number of its recommendations on information gleaned from 2015/16. Services have changed considerably since then as the RCC has become more embedded, the sector as a whole responding to changing external factors including welfare reform, changing WG priorities and new legislation.

It would therefore be pertinent to undertake further, follow-up research/report in the near future to see the hard work undertaken locally by both SP teams and support providers to address these issues.

1. The impact of wider policy developments on the programme including:

The overall clarity of the Programme's objectives; New SPPG Grant guidance objectives are clear; (re-) emphasis on homelessness prevention is positive.

The implications of, and emerging response to, the UK Government's Supported Accommodation review; The decision not to apply the LHA cap to social/supported housing is positive for the sector; however, there is a lack of clarity around the future of supported accommodation defined as short term.

The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years; N Wales has achieved some good success in regional working, but the impact is seen more in sub regional joint commissioning

The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015; The uncertainties around SP funding make it difficult to plan for sustainable services. There are issues around some needs mapping systems, and particularly outcomes data, which run the risk of informing unsustainable service planning,

2. Monitoring and evaluation including:

How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring; Outcome data has been unreliable - it is considered in contract monitoring/project reviews (which inform commissioning), but has had to be treated with caution.

The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework; The new outcomes framework is only going to work if this is backed up with a revised, robust database.

How any revised outcomes framework arrangements can be best communicated and embedded; Training for both Managers and frontline staff will be vital. And a user friendly guide.

Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services; All SP Teams could consider use of KPIs, and may also consider payment by results. Ultimately, commissioning has to be more outcomes focussed. Re-affirming the core business of SP support is an important part of this

3. The distribution of Programme funding and financial planning including:

The issues that need to be considered in developing and implementing any new funding formula; The report mentions that Denbighshire received a total of £1.94 million more than it would have done had Welsh Government continued to implement the original formula, but as we have actually already been cut by C£1.5 million over the last 5 years, this would mean cuts of almost 50% to the budget since 2012. This would have a detrimental impact on frontline support. Demand already continues to outstrip supply.

It is also important to note that our support is funded in line with a benchmark rate, which is line with the living wage.

All of this needs to be considered in the context of recent announcements regarding the possible 'super grant'. With this level of uncertainty (along with the unknowns around supported housing funding, not to mention the current and anticipated increased pressures owing to various welfare reforms, not least UC), is this really the time to be considering a new funding formula?

However integrated funding offers a great opportunity to streamline services and improve outcomes but this needs to be done in a coordinated manner to ensure that services are not reactionary but planned and coordinated to ensure the service is impacting and achieving outcomes. Need to ensure that differing funding streams fully understand the needs of services and holistically look at bigger picture.

How budget pressures and funding uncertainty have affected service planning and delivery; These have had an impact on staff retention and recruitment, as well as on the market overall – e.g. a lack of interest when tendering contracts. There's limited incentive for Providers to take the risk in developing supported housing in particular.

Reasons for the identified wide variation in financial support for different client groups across local authorities; There are a number of reasons, including different kinds/levels of needs, differences in other services or opportunities (jobs, housing

etc.) available in different settings, geographical dispersal etc. This also needs to be considered within the context of the history of SP – some areas were more proactive than others in relation to THB claims for certain client groups. This has left a legacy of LA dependency on SP funding for some services.

The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns. Denbighshire Supporting People have recently taken the decision to cease their use of the North Wales 'Needs Mapping' system. For the time being, this continues to be used by the rest of the NW region.

- We're able to gather a lot of really helpful information via our Single Pathway.
- There are other sources of local and national information we can draw upon, including Outcomes and Performance Monitoring Data, the North Wales Population Assessment, and the Unmet Need Survey.
- It is a key priority for us that citizens have their voices heard and are able to shape services
- Our alignment with Statutory Homelessness is also allowing for far better joined up working and planning.

The Needs Mapping system was not giving us data we could rely on – this could be because the form was often completed by the Providers themselves, The SP outcomes system exacerbated this potential static picture given that a 'lead need' not in line with spend plan area is flagged as a 'discrepancy'. Having one unchanging 'lead need' is rarely the reality for anyone.

Gwent Regional Collaborative Committee (including responses from the Gwent Regional Provider Forum)

1. The Impact of wider policy development on the programme including:

- The overall clarity of the Programme's objectives:**

There is a general feeling that the Programme's objectives had been clear i.e. a Programme that delivered housing related support; but during the past couple of years this has become less clear. SP is one of the most cross-cutting Programmes ever introduced by central government and carried on by the Welsh Government. It is primarily a housing/homelessness programme, included in the Housing (Wales) Act 2014, which seeks to enable vulnerable people to access and maintain accommodation based on their housing-related support needs.

The Programme is expected to make a contribution to wider policy developments through: other pieces of legislation e.g. Welfare Reform, SS&W (Wales) Act 2014, VAWDASV (Wales) Act 2015, WoFG (Wales) Act 2015, Equality Act 2010 etc.; strategies e.g. substance misuse, re-offending, mental health, dual diagnosis etc.; agendas e.g. ACEs, tackling poverty, early intervention and prevention etc.. As such it has lost its identity/real purpose which now needs to be re-defined and promoted.

Ideally going forward the objectives should be made clearer about the prevention of homelessness and increasing independence for vulnerable people; whilst also highlighting the benefits of the Programme including helping people to have a home (shelter and warmth) which is a basic human right, which all other quality of life factors stem from.

Various Ministers have had oversight of the Programme during the past few years, each bringing slightly different ideas of what the priorities for the Programme should be. Updated guidance provides an opportunity to be clear about the priorities for the Programme.

- **The implications of, and emerging response to the UK Government's Supported Accommodation Review:**

The UK government's Supported Accommodation Review has recently been developed into a new policy that is subject to further consultation, but short-term, traditional supported housing funding for 'top-up' funding will be devolved to WG. Options include transferring the funding and implementation to local government which have the governance structure, systems, processes, capability and audit already in place to administer the 'grant'.

LHA rates no longer applying to supported housing and social housing is welcomed. (this should also apply to the private rented sector – especially in Wales where LAs can discharge duty into the PRS and UK wide as the PRS is the growth tenure alongside the limited availability of affordable housing) that people are increasingly relying on. Since the recent current central government consultation on the SAR financial models – defined down into sheltered/extra care, long term supported housing and short term supported housing – it is essential that:

The 3 definitions are clearly understood

That there is a mechanism in Wales to ensure that sheltered/extra care rents are regulated.

That Supported Housing in Wales is accurately 'supply mapped' to include growth and schemes in the pipeline.

That the Wales pot is maximised and hypothecated to SH, (not used elsewhere).

That the short term funding financial model/administration is based upon commissioning arrangements undertaken by LAs in alignment with SPPG revenue funding, (with scope for SP teams to manage).

It would make sense to amalgamate SPPG with this funding for accommodation-based schemes, provided adequate funding was made available each year and, if required, 'new burdens' funding. Or put the funding back in Housing Benefit departments which will now continue to provide this service for sheltered and longer-term accommodation. To achieve better value for money however it would be better placed in Supporting People arena and managed by the Supporting People Teams to assess real premises/scheme costs. This would also enable a

more strategic overview of services as is being envisaged in England (re-inventing SP!) e.g. audit total scheme costs, cross- subsidy issues etc.

WG needed to learn from what happened in England, when the removal of SPPG ring fence led to lots of costs being transferred to Housing Benefit to allow projects to continue, then making this 'pot' more expensive and as such a target for focus and cuts.

Various concerns about the insecurity for RSL's being able to agree new developments due to lack of certainty over the future of funding for new schemes.

Although it seems that Long term services now seem to be removed from the impacts of this Review, and funding will remain within the Welfare Benefits / Housing Benefit system. There is still massive uncertainty for short term projects, and how these will be funded.

- **How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments:**

Can be achieved by:

Having clear, unambiguous guidance and Terms & Conditions of Grant; reflected in WG, LA and partner websites.

WG inter-directorate meetings/briefings.

WG attendance at relevant meetings, conferences, forums etc. capacity of SP Teams to be able to also attend meetings etc. publicity campaign. Bulletins are good, if over-long, showing the complexity of the programme.

Greater use of social media.

Simplify the message about the prevention of homelessness, benefits/cost reductions to other public sectors.

Improve collaborative working across WG directorates and policy - e.g. reference to SP in other legislation guidance and policy.

Raise SP Programme with PSBs across Wales.

By being more co-ordinated in requests for the programme to consider prioritising, and giving time for this to be a planned response e.g. working

alongside the ACE's hub to implement consistent and evidence based tools / outcomes measures.

Improved communication and collaboration is needed across WG departments by ensuring that the Supporting People Programme is understood by policy makers and influencers and the impact that delivery of the programme has on individual lives – SP funding helps to ensure the right support if provided when and where people need it and does have a positive impact on public services such as health and welfare etc.

- **How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements:**

The Gwent RCC has established strong links, ensuring members are attending other relevant meetings, boards and forums e.g. VAWDASV Board, RPB, etc, and there are links for regular two way communication.

Gwent RCC has also pro-active in co-opting non-voting members e.g. Tai Pawb / OPCC / Police/ Youth Offending Service etc. Getting Health representation from 'operational' health services has been the biggest challenge, with Public Health Wales having been a regular, and engaged, member from the beginning.

Insisting that there is RCC representation on PSBs would be helpful and non-Social care representation on RPBs.

A number of current issues may mitigate against progress and concern has been raised about how 'flexible funding' will be prioritised across/within each LA rather than regional issues.

Internal mechanisms for governance/oversight of this exercise will need to be sorted out e.g. would the 'super grant' be approved/audited by the local PSB, regional PSB, RCC or RPF? What role would local planning groups and Cabinet Members have in this new proposal?

What if there is conflict between RCC/Regional priorities and local priorities?

WG need to ensure they implement the recommendations from the WAO and other previous reports.

- **The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years:**

This is covered in the governance reviews of annual reports and the WG/WAO audits. WG responsibility to monitor recommendations.

Annual budget allocations have not supported pro-active planning and along with the on-going risk of cuts since 2013; most new projects have been limited to 'pilots' in order to provide a buffer against cuts, and protect existing services should the budget reduce.

Request for WG to clearly re-state the aims and mission of the Programme; and to publish the updated SPPG Guidance.

Also it's important to make the most of the resources available, particularly while the WG SP team is so short staffed e.g. using the RDC network for two way communication between the RCC's and WG.

Working with colleagues on a regional basis has been pioneered in Gwent since 2002 when the first SP officers employed under new burdens funding were almost forced to work collectively to develop the programme, often in the early days as 'lone workers'. Gwent teams went on to harmonise paperwork and processes for teams and providers, reviews and monitoring arrangements and employ a regional development officer to enhance the programme's cross-authority work. A number of good outcomes ensued: establishing a multi-agency regional planning group, identifying gaps in provision and jointly commissioning/funding projects, getting better VFM from providers. Separate officer groups were also set up around planning and data, contracts and monitoring etc. but all was put on hold with Aylward. This had the effect of curtailing developments, replacing a tried and tested governance structure with a more bureaucratic process that has delivered less.

Another consequence was that other areas were forced along this new way of working and 'blamed' Gwent for this upheaval. 'Regionalising' quite different LAs e.g. Cardiff and the Vale of Glamorgan was never going to be easy with its different demographics, political power etc. Aylward was right to recommend that local strategic planning arrangements should be implemented/strengthened BEFORE moving to a regional structure and now SP would have been more embedded

within the LSBs (now PSBs) if this had happened i.e., a more strategic approach rather than the 'forced marriage' of the RCC.

- **The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Well-Being of Future Generations (Wales) Act 2015:**

Supporting People provides 'preventative' support, to prevent individuals reaching crisis points e.g. homelessness / worsening mental health / offending behaviours and contact with the criminal justice system / being respectful neighbours and members of local communities. All of which build resilience and protective factors for both that individual's future, but also the future of any children they may have.

Collaboration, co-production and sustainability are stymied by annual funding, piece-meal planning and lack of joined-up strategic working across partners. Funding Flexibilities impact has yet to be analysed but likely to impact negatively on regional collaboration at the expense of more local collaboration in delivering local Wellbeing Plan priorities. This is symptomatic of the approach to the Programme by those who devise change i.e. let's shoehorn SP into other agendas, strategies, priorities without thinking about what the Programme is fundamentally about i.e. housing, housing-related support and the prevention of homelessness. The supported housing sector was born out of the Housing (Homeless Persons) Act 1977 which resulted in funding for non-statutory homeless people via hostels, refuges etc. ..this should not be forgotten. Yes the Programme will contribute to the wider Well-being of Future Generations priorities and objectives along with specific projects developed by local authorities but this should not deflect the sector from its everyday important work.

Longer term budget awards to assist in sustainability agenda could help improve commissioning arrangements especially where capital applies. Gwent SP teams are skilled at managing the Programme through a Well-being of Future Generation lens. Greater links with the PSB could assist.

2. Monitoring and evaluation including:

- **How monitoring / outcome data is use to inform decision making about programme expenditure and contract monitoring;**

Across Gwent data use is well embedded to inform decision making about the Programme with regular meetings held with providers informed by invoices, schedules, SP Pricing Policy, SP8 project finance forms, GNMEs (Gwent Needs Mapping Exercise forms), outcomes data etc. Re-modelling and re-pricing are considered before decommissioning. In addition periodic fuller reviews are conducted with recommendations and action plans followed up in the regular partnership meetings. Information is reported to local planning groups and the RCC as required and relevant.

General feeling that WG SPPG Outcomes have been difficult to use to analyse decision making due to limited faith in their meaningfulness and as such their usefulness for this. They need to be better linked with e.g. Homelessness definitions under legislation, rather than being 'standalone' as currently.

Ensuring that sustainability of services is key. Retendering every couple of years or even retendering when you could extend provision is not helpful.

- **The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework:**

There is a lot of concern and resistance to the scoring system being changed from 1-5 to 1-3, as this would effectively render the system meaningless as there would be even more limited scope to show progress, and concern that most people would end up on point 2 for most of their journey, this will not allow the individuals being supported to see that they had made progress either.

There was a suggestion about consideration being given to involving ONS in development of a new system, as they could advise on the basis of evidence based good practise, also the use of Well Being Score cards.

Consideration to be given as to whether there should be different systems for monitoring long term and short term schemes.

Should also be used in conjunction with better use of case studies, exit interviews/forms, review interviews with s/users, ex s/users and stakeholders.

Improving Lives document – a cost–benefit analysis and Cap Gemini report.

Greater consistency across Wales in terms of type of data collected, what is direct and indirect costs and expected impacts/outcomes required Monitoring and evaluation of the programme

- **How the revised outcomes framework arrangements can be best communicated and embedded;**

Clear new outcomes framework arrangements to be developed.

Training and transition resources and implications to be factored in and will need to be appropriately resourced. This would enable all providers and LA areas to interpret and use in a consistent manor.

Social media, leaflets, websites, conferences, seminars etc

Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services;

An element of sustainability monitoring i.e. the benefits following the official end of support could be really useful.

Assessing the different outcomes for long term & short term projects, and possible certain client groups.

Cost calculators, SP Pricing Policies, talk to SP Teams to see how VFM has been achieved: re–modelling of schemes, mergers, re–pricing etc.

Gwent SP teams are skilled at assessing VfM. This skillset/knowledge/ experience is exemplary and could be used as good practice.

Assessment of regional need is key to ensuring where funding should be directed and type of service required that responds to the need of the very vulnerable

3. The distribution of Programme funding and financial planning including:

- **The issues that need to be considered in developing and implementing any new funding formula;**

An appropriate distribution based upon need still requires addressing. Variables/criteria and weighting to be used but must have a homelessness factor, poverty factor, health factor as well as pure demographic data and other data sources. Housing markets, supply per capita etc. should be considered. Has to link to purposes of the grant, grant conditions, guidance.

Concerns around full Funding Flexibilities, and then from 2019+ (if the SP budget line disappears), the danger that we could see a split between 'deserving' and 'undeserving' groups, with funding being prioritised for those groups who have a lot of public sympathy e.g. children and families, when compared with e.g. substance misuse / offenders etc.

Concern that the Housing related support and homelessness prevention specialist/ expertise could be lost from the sector (including commissioning awareness) if funding is to be focussed more on social services / care type services.

A plea to learn from the experience in England when the ring fence was removed from SP, and in some LA areas SP services disappeared.

A light touch approach to meeting demand for the vulnerable will only cost more in the longer term. WG need to consider the longer term impact of removing ring-fenced Supporting People funding entirely for 2019/20 and also to some degree in 2018/19 risks the lack of focus on people who are at risk and facing live changing challenges such as homelessness and abuse. WG repeatedly refers to value for money within the Supporting People programme's documentation, making it clear that it wants Supporting People funding to be used for initiatives that prevent the need for more costly interventions by Health and Welfare services.

- **How budget pressures and funding uncertainty have affected service planning and delivery:**

Budget pressures and funding uncertainty affects service delivery, much mitigated by the professionalism and maturity of the sector (LAs and providers) working together to maintain VfM, strategic planning, commissioning and procurement to try and stabilise good service provision.

Additionally:

- Year on year risk of 10–20% cuts in SP
- Welfare reforms lack of increase in income
- Supported Accommodation Review
- In an environment where there has been little guarantee of future funding, RSL's have been reluctant to commit to new developments to allow new static schemes to be developed.
- LA cuts to staff/teams, not replacing staff,
- Pressure on homelessness, social care,
- Ageing and unhealthier/more disabled society,
- Insecure jobs, zero-hour contracts, high staff turnover as services are squeezed,
- Pilots leave staff unsure of continued employment and leave early, can't replace staff in time = claw-back?
- The risks of accruing underspends = potential claw-back from WG do not help with long term planning

The lack of uncertainty of future funding does not allow for consistency of service delivery, specialist providers will and are disappearing, skills and knowledge gaps will develop and the impact on the public purse will increase as more pressure will fall onto other public services

ALL of these contribute to difficulties for RCC's and LA's in terms of robust forward planning, Uncertainty, cuts planning and annualised budgets can result in some knee jerk commissioning impacting upon operational delivery. Often resulting in pilot projects of a floating support nature being implemented in areas to fill needs gaps; so that if funding could be withdrawn the following financial year, and cuts were to be implemented, without risking the closure of too many existing schemes, affecting both service users and staff.

- **Reasons for the identified wide variation in financial support for different client groups across Local authorities;**

There is a general concern that this comment is based on a spurious notion that 'value for money' is as easy as comparing unit costs across projects, which risks not comparing like with like, or, taking into account local drivers e.g. higher transport / travel costs and time for rural areas, and pays no attention to outcomes for projects. Additionally multi/complex high needs v very low needs, peripatetic services v accommodation based costs, engagement rates across client groups, clients in situ v non, additional investment streams contributing (HB, Health, Social Care, ICF, etc) v non.

While definitions of schemes might make them seem similar, this needs to be carefully assessed to ensure that ONLY directly comparable schemes are being compared.

A lot of this has been dependant on local and regional needs assessments; in Gwent this has included consideration of Service users and stakeholders consultation days.

The WG has consistently highlighted the need for value for money in the support and services paid for by the Supporting People programme. We therefore need to understand cause and effective and then tackle the cause not the effect! We know from recent social value reports that early and appropriate intervention will see some level of saving and in some cases these savings will be substantial – especially when compared to the amount that has been spent on supporting a client

- **Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support;**

See above re comments in point 3 of this question.

In Gwent the RCC identified that Learning Disability spend was very variable across the 5 LA areas, and prioritised this for further investigation / action due to concerns that SP was funding care provision in some LA areas more than others. This led to a reduction in some projects based on individual needs assessments, and a re-distribution of the funding to other priorities (sometimes pilots – as previously mentioned).

The Aylward Review also required a re-focus of Older Person's support to focus on individually assessed need for support, and making support tenure neutral, i.e. taking it away from static / accommodation based schemes, and making it

available to older people in their own homes (wherever this might be in the local community).

Fixed support schemes are still there but may have been over-funded (THB 'top-up') or re-modelled to floating support (non-resident visiting support) e.g. sheltered housing. It is easier to commission...and de-commission... F/S as it takes a long time to develop a new supported housing scheme, sourcing capital funding problems, SHG priorities for the elderly, families etc., pilots that use underspends are nearly all F/S. Re-modelling schemes creates 'resettlement' support rather than lose funding.

Some fixed schemes are past their 'sell-by' date and are not fit for purpose e.g. some old refuges/shared schemes and have been de-commissioned, sold off or returned to general needs housing, some owned outright by providers and they can do as they wish...levels of funding for fixed schemes may have gone down BUT they may still be there just funded by Social Services or health more proportionately following a HRS assessment of individuals based on need.

SP contracts based upon hours or flexible floating support and only referencing fixed sites.

- **The extent to which local and regional planning processes and spending reflect well evidenced needs rather than historical patterns;**

Gwent has a proven robust planning process involving a wide range of stakeholders and service users and there is an excellent history and legacy of SP local and regional planning across Gwent.

Intelligence gathering can always be improved and the current inclusive and strategic planning process seeks to do this on an on-going basis, which evidences that there are still some pockets where spend needs to shift further to evidenced need from historical patterns

We provide a range of services funded by the Supporting People Programme, including Supported Accommodation for young people and women, Domestic Abuse Refuges, floating support for vulnerable people to maintain their tenancies and tenancy crisis support for people at risk of losing their tenancy. Every day we see the difference that Supporting People funding makes to the most vulnerable people in society, enabling them to use their strengths to live independently and purposefully in their communities. We are extremely concerned by the Welsh Government's proposal to remove the ring-fence from the Supporting People Programme, since evidence from England clearly shows the impact on Supporting People services and a subsequent rise in homelessness. Given the uncertainty caused by the UK Government's Supported Accommodation Review, it is vital that a ring-fence remains in place for Supporting People funding, and that the funding sits alongside homelessness prevention and housing related work to ensure its primary focus is retained.

1. The Impact of wider policy developments on the programme

a) The overall clarity of the Programme's objectives

Llamau feels that until recent years there was clarity over the purpose of the Supporting People Programme, in that its objective was to provide housing-related support to help vulnerable people to live as independently as possible. However, in recent years, a number of RCCs have received communications from Welsh Government asking them to focus on areas of work, including domestic abuse prevention, support for care leavers and other vulnerable young people and homelessness prevention.

We welcome the Welsh Government's review of the strategic objectives of the programme to ensure greater clarity amongst providers of Supporting People services, however we strongly believe that it is vital that homelessness prevention and housing-related support remain at the heart of the objective of supporting people. Supporting People services excel at preventing homelessness and ensuring that vulnerable people are able to live independently, and the loss of this expertise

would have a significant impact on other public services, particularly health services and criminal justice.

b) The implications of, and emerging response to, the UK Government's Supported Accommodation Review

As a provider of short-term supported accommodation, we remain very concerned about the UK Government's Supported Accommodation Review. Although the UK Government has now confirmed that long-term Supported Accommodation will not be subject to Local Housing Allowance, there remains significant uncertainty about how costs for Short-term Supported Accommodation will be covered. The UK Government's White Paper outlines that for short-term supported accommodation in Wales and Scotland, "an equivalent amount will be provided for those administrations to decide how best to allocate the funding." The paper goes on to say that the administrations will be provided with an amount in 2020/21 equivalent to that which would otherwise have been available through the welfare system. We are very concerned that no commitment has been made to increase this funding as demand for services increases, and remain extremely concerned that funding in future years will be capped at the 2020/21 level despite likely increases in cost, given the projected increases in homelessness and the difficulty in finding affordable move-on accommodation. Given the pressures this is likely to create on short-term accommodation, it is vital that the Welsh Government continues to ring-fence funding for housing-related support and homelessness prevention, in order to avoid further cuts to services designed specifically to prevent homelessness.

Furthermore, with the funding due to be devolved from April 2020, we are concerned about the amount of work to be done to develop a new and fair funding system in Wales.

c) How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments

Communication about the priorities for the Programme and the impact of wider developments needs to be more coordinated so that all local authorities and providers clearly understand what the priorities for the programme are. With the development of other legislation in Wales, it is vital that everyone understands the implications of other legislation on the Supporting People Programme and whether that changes priorities, particularly with consideration of how the early intervention

and prevention work delivered under Supporting People ties in with new legislation. We would also welcome the Welsh Government giving providers more time to respond to the new priorities and ensuring that it is coordinated alongside the ACEs hub to implement consistent evidence-based tools and outcomes measures.

d) How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements

In order to ensure alignment, it is vital that members of Regional Collaborative Committees attend other relevant meetings, including the VAWDASV Boards and Public Service Boards, ensuring that there are links for regular two-way communication. We have also seen significant success in securing non-voting members of the Regional Collaborative Committees, particularly from PCCs and Public Health Wales, although it has been significantly harder to secure involvement from operational health services.

The creation of Public Service Boards for each local authority presents some challenges in ensuring representation at each PSB within the region, and would welcome the consideration of creating Public Service Boards at a regional level.

e) The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years

Our experience through representation on a number of RCCs is that there are significant differences in the commitment to regional working between regions. Some regions have embraced regional working and have introduced additional measures outside of the Regional Collaborative Committees to ensure that key pieces of work can be progressed across the region, and to ensure that the needs of key groups of vulnerable people are met consistently across the region.

In addition, annual budget allocations make it difficult for regions to pro-actively plan to meet need, and have often resulted in new projects being introduced as pilots with limited opportunity to extend the project beyond its first year. This limits innovation and limits the amount that Regional Collaborative Committees can do to respond to emerging needs.

Furthermore, the proposed amalgamation of several funding streams from April 2019 is likely to stifle the ability to pro-actively plan and to respond to emerging need further, since additional pressure will be placed on Supporting People

services, with the possibility of significant cuts to services. We are extremely concerned that priority will be placed on the other funding streams which form part of the merged grant, with significant risk of the complete loss of Supporting People service and the resulting devastating impact that we have seen in England.

f) The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Wellbeing of Future Generations (Wales) Act 2015

The Supporting People Programme is crucial to the ambitions of the Wellbeing of Future Generations Act. At the heart of the Programme is the prevention of homelessness and support to reduce the risk of future homelessness. The Programme also prevents the use of other public services in future including criminal justice services, mental health and other health services. The programme allows us to work with people and ensures that Wales is working towards the Wellbeing Goals set out in the act by building resilience and a more prosperous future for those the Programme supports, but also improving the wellbeing of the children of those the Programme supports.

There does, however, seem to be a limited link between governance and management arrangements, with no guaranteed collaborative working between Public Service Boards and Regional Collaborative Committees. Further work could also be done to identify ways of measuring the impact that the Supporting People Programme has on the delivery of the Wellbeing of Future Generations (Wales) Act.

2. Monitoring and Evaluation

a) How monitoring / outcome data is used to inform decision making about programme expenditure and contract monitoring

The Welsh Government outcomes which are used to monitor Supporting People performance have been difficult to use to inform programme expenditure and contract monitoring. This is largely due to a lack of consistency in the monitoring of outcomes employed by different local authorities and by different providers. In addition, whilst the monitoring process attempts to measure progress, there is no base line to give meaningful data on the effectiveness of support interventions. This has resulted in limited faith in their meaningfulness and a hesitancy to use the data to inform decisions. Furthermore, there is little link between the measurement of other areas of work and Supporting People, particularly the Violence Against

Women, Domestic Abuse and Sexual Violence (Wales) Act, Wellbeing of Future Generations (Wales) Act and the Housing (Wales) Act. At the moment, the outcomes monitoring for the Supporting People Programme does not allow for any measurement of its contribution to these areas of work.

b) The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework

We are very concerned about the Welsh Government proposals to introduce a three-point scoring system for Supporting People outcomes. We strongly believe that the current five-point scoring system has serious limitations in allowing organisations to demonstrate the progress people have made, and believe that the three-point system will limit this further. In addition, the proposed system could have a negative impact on the progress that people make, since in reality most are likely to be scored on the middle point throughout their support, and will not understand themselves the progress they have made while being supported.

We strongly believe that the proposals should include the introduction of different outcomes monitoring for short and long term schemes. There is huge variation in the length of support offered between different schemes, and it should be acknowledged that the same progress cannot be made on a shorter-term scheme. An outcomes monitoring system could be developed to demonstrate the value of schemes of all lengths fairly.

At Llamau we have been doing some work with the Office for National Statistics on outcomes monitoring and believe that consultation with them would lead to a more valuable method for measuring the outcomes for the Programme.

c) How any revised outcomes framework arrangements can be best communicated and embedded

The introduction of any new outcomes framework arrangements needs to be clearly and consistently communicated to both local authorities and to providers. Consistent training should be provided to all local authorities and providers to ensure a consistent understanding of the new framework. Ongoing monitoring of the local authorities' and providers' use of the framework would ensure future consistency.

d) Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services

Monitoring and evaluation of the Programme would be significantly strengthened by a robust approach to monitoring the sustainability of the outcomes. This could be delivered through the linking of different Welsh Government data sets to demonstrate the impact of the Supporting People programme in reducing future costs to services such as health services and criminal justice services.

The introduction of monitoring of repeat referrals would further strengthen the evaluation of the Programme, and ensure that providers are delivering support which enables people to live independently and which limits the chances of future referrals to other Supporting People services.

In addition, as already outlined above, we believe that the outcomes monitoring could be improved through the introduction of tailored outcomes monitoring for different interventions, with different data collected depending on the length of support provided, or potentially depending on the client group supported. This would allow clear objectives to be set for each type of project with clear measurement of whether those objectives have been met.

3. The distribution of programme funding and financial planning

a) The issues that need to be considered in developing any new funding formula

We have significant concerns about the introduction of full Funding Flexibilities and the risk that Supporting People will not be ring-fenced from 2019. We have major concerns that this could lead to a significant cut to Supporting People funding which would lead to a significant increase in homelessness, with the most vulnerable likely to be at the highest risk. Without the ring-fence for Supporting People, there is a significant danger that funding could be prioritised for those groups of people for whom there is greater public sympathy, such as children and families, while those groups for whom there is limited public sympathy, such as offenders and young people could lose funding.

The proposed amalgamation of Supporting People with other funding streams also presents a substantial danger that expertise in homelessness prevention and housing-related support could be lost from both service providers and from local authority commissioners. The danger is clear to see when we look at the evidence from England when the Supporting People ring-fence was removed, resulting in the decimation of Supporting People services and a significant increase in homelessness.

b) How budget pressures and funding uncertainty have affected service planning and delivery

For a number of years, there have been significant funding uncertainties, often with the risk of 10–20% cuts to Supporting People Budgets. Coupled with annual budget allocations, welfare reforms and the Supported Accommodation review, this has made it extremely difficult for Regional Collaborative Committees and Local Authorities to plan adequately for the future. It has often resulted in the development of in-year pilot projects for floating support, allowing for the possibility that funding could be easily withdrawn in the following year if necessary. In an environment where there has been little guarantee of funding, Registered Social Landlords have been reluctant to commit to the development of new static schemes to support vulnerable people to live independently.

c) Reasons for the identified wide variation in financial support for different client groups across local authorities

We have some concerns about the way in which the variations in financial support for different client groups have been derived. Recent cost analysis has not taken into account the size of schemes, and as a consequence have inferred that more expensive schemes' costs are too high. This has not taken account of the fact that smaller projects for young people deliver more effective outcomes, since they are more able to support people with complex needs. Current analysis has been a very crude tool which would not stand up to any scrutiny. We would be concerned if these variations continue to be calculated based simply on unit costs, which risks not comparing like with like. In order to determine value for money, it would be essential to ensure that truly comparable projects are compared, and that factors such as the objectives of the project, the client group being supported and possible additional costs like travel costs for projects in rural areas are considered in the calculations. For example, the difference between 24 hour and non-24 hour projects must be taken into consideration, with 24 hour projects typically working with people with the most complex needs. Whilst both types of project have their place, they should not be compared.

It is likely that some variation in financial support for different client groups has resulted from variance in regional needs assessments which will have identified varying needs at a local level.

d) Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support

As already outlined above, continued funding pressures coupled with annual budget allocations have often led to the development of in-year pilot projects, which are often floating support projects, rather than fixed support projects to enable the project to be ended easily after the pilot period.

We are also aware that the Aylward review required a re-focus of support for older people based on individually assessed needs and ensuring that support is tenure-neutral. This resulted in the development of more support delivered to older people in their homes, rather than in fixed support settings.

In addition, the Gwent Regional Collaborative Committee identified that spend on support for people with learning disabilities varied greatly across the five local authorities, resulting in a re-distribution of funding to some floating support pilot schemes.

Furthermore, there has also been a directive from Welsh Government to move spend from fixed-term projects to floating support with a requirement for Regional Collaborative Committees to report against this in their annual review. This has not taken account of the evidence of need of the client groups.

e) The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns

Historical patterns have diminished over the years. There are some good examples of local and regional planning processes identifying evidence-based needs and ensuring that funding is diverted as necessary.

However, we strongly believe that it is also important to understand that individuals can have a range of complex needs, and can't necessarily be easily identified by their lead need alone. For example, in the Gwent region there is no specific project purely for care leavers, but care leavers are supported through several projects for young people with support needs. Furthermore, it is often the case that it can be difficult to identify the person's lead need, with many people having a range of complex needs including substance misuse, mental health issues and domestic abuse. There is a real danger in looking at primary need first and foremost as increasingly all providers are working with complex needs and there is no system currently to reflect that.

Cynulliad Cenedlaethol Cymru | National Assembly for Wales
Y Pwyllgor Cyfrifon Cyhoeddus | Public Accounts Committee
Rhaglen Cefnogi Pobl Llywodraeth Cymru | The Welsh Government's Supporting
People Programme
PAC(5) SP 11
Ymateb gan Y Gweinidog Tai ac Adfywio | Evidence from Minister for Housing and
Regeneration

Thank you for your letter and enclosures following the Public Accounts Committee's evidence session on the Supporting People Programme.

I note the concerns expressed by Community Housing Cymru (CHC) and Cymorth Cymru in their evidence and supporting documentation which will be taken into consideration as we work with stakeholders to inform decisions about future grant structures.

The impact of wider policy developments on the programme

Whilst the Supporting People programme currently offers a diverse service pattern which benefits the individuals receiving this, the links to both the population needs assessments and well-being assessments, under the Social Services and Well-being (Wales) Act 2014 and Well-being of Future Generations (Wales) Act 2015 respectively, remains to be clearly demonstrated.

It is acknowledged however, that the PSB Well-being Plans will focus in part on the priorities identified as a result of engagement and consultation with communities, and in particular focus on actions that enable public service partners to work together to make a difference. For this reason Supporting People may not feature explicitly within PSB Well-being Plans or Objectives. However, collaborative commissioning and integrated working are key priorities for the West Wales Regional Partnership Board and the Dyfed Area Planning Board.

The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015.

The Supporting People Regional Collaborative Committee includes attendance of a wide range of stakeholders including service providers and feedback and input from service users is a priority. Input from Local Public Health Teams is also important. The broad membership is reflective of the ways of working required under the WFGA.

How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements;

This is certainly achievable as there are overlaps in membership, at least organisationally, between the Supporting People Regional Collaborative Committee, the Regional Partnership Board (RPB), Public Service Boards (PSB), Substance Misuse Area Planning Board (APB) and other collaborative committees. As the Supporting People Regional Collaborative Committees are overseeing a

specific programme of work with defined delivery expectations it is likely that it could feature as an element of other partnership business e.g. RPB to support the delivery of the Area Plan priorities, APB to support action to address housing needs of substance misuse clients.

Monitoring and evaluation

There would appear to be opportunities to improve this and expand the performance indicators to include health measures. Within the Mid and West Wales Region for the Supporting People Regional Collaborative Committee, which also includes Powys, there would appear to be a lot of continuity from historic county level practices. The regional approach offers a forum to streamline this in terms of consistency, however, there could be more robust evaluation using readily collected data, so called natural evidence. This might include some basic economic calculations allowing some level of comparison between different counties and also the different people served.

The distribution of programme funding and financial planning

The issues to be considered when developing funding formulae are wide ranging and must take account of actual need, often based on existing usage, as well as hidden or unmet need. The impact of delivering/providing services in rural areas also needs to be acknowledged.

In responding to this, it is important to state this is not about the financial processes, which are governed by separate audit processes. In some ways, this section builds on the previous section about evaluation and trying to ascertain value for money, but also being clear about service user outcomes and both short term and longer term benefits.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a one housing system approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in sustainable framework;
- improves standards and develops the consumer voice within the private rented sector
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
- uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;
- promotes consumer rights & tenant involvement;
- and supports the continued professional development of housing practitioners.

1. Introduction

1.1 The Supporting People Programme Grant (SPPG) has been a pivotal keystone in ensuring some of society's most potentially vulnerable groups in Wales can gain access to support services which sustain tenancies, develop skills and maintain independence. The following responses provide an overview on aspects of the programme's delivery and challenges to its longer-term prospects.

2. The impact of wider policy developments on the programme

2.1 Whilst we believe the impact SPPG is well-understood within the housing sector, by partners involved in its delivery and those in receipt of services, it is clear that there is further work required to increase understanding in other sectors and the broader public on what the programme tangibly achieves. We would welcome further efforts by the Welsh Government to communicate the achievement of SPPG services to date, the value of its workforce and clarity on the longer-term supported we would hope to see it receive.

2.2 The broader picture impacting the implementation of SPPG services relates directly to the UK Government's supported accommodation review. Although many considerations in the review do not apply directly to Wales, the exploration of a devolved pot of funding for short-term accommodation is clearly central to the SPPG programme. We would want to see a clear mechanism to ensure suitable space for the funding to grow in-line with demand. A limited or capped pot will only dwindle in effectiveness as services increasingly come under pressure.

2.3 From a governance perspective the delivery structure for SPPG in Wales has been developing well through Regional Collaborative Committees (RCCs). The RCCs are underpinned by strong partnership work encompassing representatives from a number of sectors, including housing, health, public protection and local councillors.

2.4 Whilst it is clear that some areas are able to work together more effectively than others the RCCs should continue to be developed and highlighted as positive steps forward in regional working. We would want to see clear links with the work of Public Service Boards as well a strengthened links with Health Board in Wales, recognising the merits of its prevention work to the health sector.

3. Monitoring and evaluation

3.1 We believe that further work is required to ensure the lived-experience of those accessing services is captured effectively by the outcomes framework. This should include developing consistent mechanisms for involving people using SPPG services following their time involved with the service.

3.2 In addition there needs to be a clear understanding of the diversity profile of those receiving services and a clear method of utilising diversity data to identify any gaps in service provision which could cause inequalities to arise in accessing services.

4. The distribution of Programme funding and financial planning

4.1 As one of the Welsh Government's largest revenue budget's, it is understandable that the SPPG receives a considerable level of scrutiny around how funding is allocated and spent. Whilst budgetary pressures has meant that the level of funding has reduced overall, in recent years however there has been protection for the budget recognising the vital work provided through services funded by the grant. We strongly welcome the Welsh Government's support for this area and believe a continued focus and protection for this budget is vital if we are to sustain services that reduce homelessness, tackle poverty and increase employment opportunities.

4.2 We are concerned however that whilst protection has brought with it an annual renewal of confidence in the sector, this cycle does not lend itself well to the long-term planning of services. Year on year the housing sector continues to campaign for the protection of the SPPG as the Welsh Government undertakes the drafting and confirmation of its budgetary commitments. Whilst it is clear that the voice of the sector has been well recognised in both this, and previous years, greater certainty is required to ensure the SPPG is able to be as effective as possible in meeting both long and immediate short-term demand.

4.3 The most recent Welsh Government budget has reflected that SPPG is sustained at current levels but in 2019/20 the ring-fence, as it appears, will be removed and the budget combined with a number of other prevention-type budgets.

4.4 We have real concerns that this move will create greater uncertainty and create similar consequences to developments in England following the removal of the ring-fence from the equivalent budget. In England the ring-fence was removed in 2009 and following a Freedom of Information request by Inside Housing, substantial cuts we're highlighted following this with some local authorities cutting the budget line for Supporting People by up to 60% (<https://www.insidehousing.co.uk/news/news/scale-of-supporting-people-cuts-uncovered-25403> (Accessed 13/12/2017)).

4.5 Whilst we understand the Welsh Government's rationale in seeking sensible approaches to ensuring funding is as effective as possible we urge caution in pursuing these options. Service providers will be understandably anxious considering the situation that developed in England where Supporting People funding has disappeared in the aftermath.

4.6 We strongly urge the Welsh Government to maintain the ring-fence for the SPPG programme and provide certainty for service providers at an early stage as to not

As the umbrella organisation for violence against women, domestic abuse and sexual violence in Wales our response is based on consultation with our membership of specialist services and reflects their experiences across all regions. Additionally, we consult with survivors through Welsh Women's Aid's SEEdS project (Survivors Empowering and Educating Services), whose first-hand knowledge of using temporary accommodation informs this response.

Question 1: The impact of wider policy developments on the programme

Domestic violence costs Wales £303.5m annually: £202.6m in service costs and £100.9m to lost economic output. These figures do not include any element of human and emotional cost, which the research estimates costs Wales an additional £522.9m.¹ Each domestic abuse homicide is estimated to cost public services in the region of £1.1 million.^{2 3}

An independent Supporting People evaluation in 2009 found that refuge and floating support services for survivors of domestic abuse represent a saving to the state of £19,635 for each survivor who receives a dedicated domestic abuse support service via a refuge or floating support. If efficiencies of this order are achievable on a small proportion of total spend, they could be even greater if applied to mainstream budgets for policing, children, health and justice.⁴

A more recent study of refuge provision made a conservative estimate of the value generated by one year of delivering refuge services providing a combination of refuges, outreach and advocacy services: the social value was in the region of £33m to the state. The overall social return on investment identified that a refuge service model is economically efficient at creating positive outcomes, and that for

¹ Walby, S., 'The Cost of Domestic Violence: Update 2009', Lancaster University, 2009, http://www.lancaster.ac.uk/fass/doc_library/sociology/Cost_of_domestic_violence_update.doc, (accessed 6 Dec 2017).

² Brand, S. and Price, R. 'The Economic and Social Costs of Crime', *Home Office Research Study 217*, 2000.

Brennan, D. 'The Femicide Census: 2016 findings – Annual Report on Cases of Femicide in 2016', *Women's Aid England*, 2017.

³ New data from the 'Femicide Census 2016' indicates that there were 13 murders of women by men in Wales in 2016, with South Wales reporting the second highest number in England, Wales and N. Ireland (8 women killed), and the fourth highest per capita (at 0.62 per 100,000). With each domestic abuse homicide estimated to cost public services around £1.1m, this amounts to an estimated £14.3m in Wales in 2016.

Brennan, D. 'The Femicide Census: 2016 findings – Annual Report on Cases of Femicide in 2016', *Women's Aid England*, 2017.

⁴ Audit Commission, 'Supporting People Review: Report for the Communities and Local Government Department', Audit Commission, 2009.

every £1 spent, an average of £3.54 social value was created through a combination of safety, health and criminal justice outcomes.⁵

Supporting People has the potential to continue creating a real difference to vulnerable people across Wales, including survivors of violence against women, domestic abuse and sexual violence (VAWDASV). Any reduction to funding levels received by specialist VAWDASV services can have a massive impact and there are great fears around the potential impact of the proposed Welsh Government budget plan to remove the ring-fence of both the VAWDASV Services grant and the Supporting People Programme grant if they are absorbed into the proposed Early Intervention, Prevention and Support Grant.

Welsh Women's Aid members are concerned that removal of the Supporting People ring-fence, without transitional arrangements that maximise the protection of those services most likely to be lost (like VAWDASV specialist services), will very likely result in the dismantling of our national network of third sector specialist services that provide life-saving and life-changing support to victims of domestic abuse, sexual violence, 'honour-based' violence, FGM, sexual exploitation and harassment.

The impact of these Welsh Government proposals will be compounded by UK Government plans to change the way supported housing is funded, effectively handing over the equivalent of rental costs for refuges to governments or local areas to distribute. There is no specific protection in this funding model for refuges. Yet this will be accompanied by a UK Domestic Abuse Bill in the New Year which will increase demand for support and place further pressure on specialist services.

Welsh Women's Aid recommends that Supporting People be removed from the Full Flexibility Pathfinder pilot projects, therefore re-instating the ring-fence and protecting Supporting People funding.

1.1 The overall clarity of the Programme's objectives:

Welsh Women's Aid welcomes the addition of homelessness and poverty prevention in the Supporting People objectives, which the recent audit⁶ noted had previously been absent. While 7% of all Supporting People funding is allocated to

⁵ New Economics Foundation (2013) 'Social valuation of Refuge services for survivors of domestic violence', NEF Consulting

⁶ Auditor General for Wales, 'The Welsh Government's Supporting People Programme', *Wales Audit Office*, 2016.

women experiencing domestic abuse⁷, it is surprising that domestic abuse is not explicitly referenced in the Supporting People objectives. Survivors of domestic abuse depend on this funding to provide life-saving and life changing provision through specialist VAWDASV services. It is therefore our concern that without explicit reference to domestic abuse/VAWDASV in the Supporting People Grant aims, this funding could potentially be allocated away from VAWDASV survivors and specialist services who support them.

Our members' felt some reassurance in relation to the objectives on housing and keeping people housed; they expressed that they felt that these objectives within the Supporting People Programme are clear. However, in circumstances that affect people's ability to retain tenancies because of the circumstances they find themselves in (that could change their housing situation), such as domestic abuse, the objectives are less clear.

Further to this, there are also concerns amongst our membership about how some people who are in need but do not neatly fit into the identified criteria do not always qualify for the support they so desperately need. One service stated:

"the objectives of the programme need to be clearer in terms of increasing independence for vulnerable people, providing shelter and basic human rights."

Welsh Women's Aid recommends the Supporting People Programme objectives:

- Specifically recognise VAWDASV to reflect the integral role that the programme has in providing support for survivors of VAWDASV.
- Are broad enough to reflect the diversity of vulnerable people's circumstances to enable support to be provided that is needs-led and person centred.

1.2 Implications of, and emerging response to, the UK Government's Supported Accommodation review:

Welsh Women's Aid members have highlighted that the change in funding from the current housing benefit model presents a real risk to refugees in Wales, as housing benefit makes up a large proportion of refugee income. All refugee provision across Wales may be at risk, but the issue is particularly acute for smaller organisations.

⁷ Ibid, p.7.

Welsh Women's Aid responded to the UK Government consultation⁸ in the spring and were involved in the short term accommodation working group that put forward proposals to the UK Government on funding mechanisms. We are also working with the Welsh Government in developing a devolved model for funding supported housing. We are also in the process of consulting with our members and engaging with survivors in responding to the Department for Communities and Local Government and Department for Work and Pensions published a White Paper⁹ on Funding Supported Housing

Welsh Women's Aid has welcomed the changes introduced to extend the period for the Welsh Government to develop a Wales model for this funding stream, to April 2020, and the recognition of the need for a different model for short-term accommodation. However, there are still grave concerns, particularly around the proposed level of funding in 2020–21 devolved to the Welsh Government, which is set to be equivalent to what would otherwise have been available through the welfare system. As a consequence, the funding levels will be set at current projections for future need and so, may not be flexible to actual demand. The UK Government has stated that a new funding model will ensure that supported housing continues to be funded at the same level it would have been in 2019/20, but this does not allow for increases in rent charged by landlords that are passed onto service providers, or for inflationary increases in service charges, for example in energy costs. It is likely that any increase in costs or reduction in the pot will lead to a reduction in support elements at a time when we are seeing increased support needs of women and children accessing refuge.

There is also a risk that as Welsh Government devolves all Supporting People and VAWDASV Grant funds to local authorities and loses the ring-fences on both grants, the allocation of the funding for supported housing from the previous housing benefit pot in Wales will also go into a local non-ring-fenced pot. If this is the case, refuges in Wales would be at risk of losing all their funding, not just the support element. In addition, refuges are run as part of a UK-wide national network of services and continued disinvestment of the specialist VAWDASV services on either side of the boarder endangers survivors and their children, regardless of the region in which they live.

⁸ Copy of our response can be found here: <http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/WWA-Response-Funding-for-Supported-Housing.pdf>

⁹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/656027/Funding_supported_housing_-_policy_statement_and_consultation.pdf

One member specialist service has summarised their response to the UK Government's Supported Accommodation Review:

"We believe that the distribution mechanism for the proposed devolved supported accommodation funding must be clearly linked to Supporting People commissioning. Therefore, it is essential that Supporting People funding remains distinct and is not merged with non-housing grants. The three definitions of supported accommodation need to be clearly understood; there is a mechanism in Wales to ensure that sheltered rents are regulated; that supported housing in Wales is accurately 'supply mapped' to include growth and schemes in the pipeline; that short term funding financial model/administration is based upon commissioning arrangements undertaken in alignment with SPPG revenue funding."

This framework would need enable cross-boundary working. Local/regional connection criteria is not appropriate for VAWDASV accommodation services as it may be for other Supporting People services. The national network of refuge and move on provision in Wales is a critical resource for the many survivors that need to travel beyond their local area to escape their abusive partner to ensure the safety of themselves and their children. Any funding model needs to acknowledge the potential impact on the network provision across Wales. While there is a possibility for the model to be a regional and local mechanisms, it must guarantee that it supports services to operate collectively within a national network, both in Wales and across the UK.

Welsh Women's Aid recommends the new model being developed by Welsh Government must:

- Deliver the Welsh Government commitment to work collaboratively to build provision of VAWDASV specialist services by providing sustainable funding for VAWDASV specialist services, as set out in the VAWDASV National Strategy 2016–21. Revenue and capital funding systems must work together to provide a long term and sustainable funding solution for specialist services and their services users.
- Require adherence to the VAWDASV commissioning toolkit for Wales¹⁰ and the accompanying forthcoming statutory commissioning guidance for

¹⁰ https://www.lloydsbankfoundation.org.uk/VAWDASV%20Toolkit_Wales_web.pdf

VAWDASV specialist services, being produced as part of the Welsh Government commitments within the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.

- Consider the impact of Universal Credit on women and children accessing move-on accommodation, and ensure sustainable funding for refuges must include delivery of resettlement support, which helps survivors move on to rebuild their lives and establish themselves in local communities.
- Ensure it supports the minimum provision of services at national level to ensure Wales adhere to the Istanbul Convention requirements¹¹, and that for domestic abuse services they adhere to the Wales National Quality Service Standards (endorsed by the National Advisor and delivered by Welsh Women's Aid, with support from Welsh Government).
- Guarantee that it supports services to operate collaboratively to deliver a national refuge network for survivors, as part of a Welsh and UK network of provision.
- Supports refuge provision as defined by *Routes to Support* (previously UK Refuges Online), "a refuge offers accommodation and support which is tied to that accommodation. The address will not be publicly available. It will have a set number of places. Residents will receive a planned programme of therapeutic and practical support from staff and access peer support from other residents. This will include: access to information and advocacy; emotional support; access to specialist support workers (e.g. drugs/alcohol misuse, mental health, sexual abuse); access to recovery work; access to support for children (where needed); practical help; key work & support planning (work around support needs including e.g. parenting, finances and wellbeing); safety planning; and counselling." (Routes to Support, 2017)

¹¹ See <https://rm.coe.int/168046031c> and <https://icchange.co.uk/about/resources/>

1.3 How the Welsh Government might improve communication about priorities of the Programme and the impact of wider developments:

Welsh Women's Aid members have called for relevant national updates, with regional information to be distributed whenever applicable. As the national VAWDASV umbrella organisation in Wales, Welsh Women's Aid can support disseminating information to the appropriate organisations within our network. This approach could also be applied to other membership organisations of Supporting People funded organisations such as Cymorth Cymru and Community Housing Cymru. In addition, Supporting People teams within local authorities could also provide updates. By adopting a number of approaches, it is likely that information will reach relevant recipients and not be lost when specific contacts change job roles.

One service voiced concerns about their organisation only receiving updates when they were being asked to do more, such as to communicate an increase in the levels of mandatory monitoring. There was a desire for updates from Welsh Government to "us as providers" and more of a conversation with Supporting People teams that supported service staff in their implementation of the programme.

Welsh Women's Aid recommends

- Consistent, relevant and timely national updates to service providers from Welsh Government and Supporting People teams, supported by umbrella organisations such as Welsh Women's Aid.

1.4 How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements:

Welsh Women's Aid recommends aligning Regional Collaborative Committees (RCCs) work with VAWDASV strategic boards, as part of a joined up approach to tackling VAWDASV across Wales. Further to this, one recommendation from our membership was that the RCCs should be using existing fora and building on collaborations rather than setting up new boards. Our members highlighted there was a need to:

"understand how Supporting People integrates with other agendas and positively impacts on other services."

One service raised concerns that they are not able to effectively engage with the Supporting People provider forums. It is critical that VAWDASV services have representation on these forums. There is a need to ensure that all services funded by the Supporting People Programme are engaged with service provider forums and have access information from the RCCs to allow for transparency of the RCCs' planning and decision making.

Welsh Women's Aid recommends that the Supporting People Programme:

- Ensure links between RCCs and VAWDASV strategic boards, including representation from either on both partnerships.
- Ensure VAWDASV specialist services are supported to effectively engage with provider forums across all regions.

1.5 The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years:

Welsh Women's Aid members have called for promising practice to be:

“shared and opportunities for increasing focus on partnership working with other key strategic groups be a key factor so that there is clarity on how key programmes impact on services and how agendas can be integrated.”

Our members have reported that there is a lack of consistency across regions in the criteria and relationship with Supporting People team. For instance, some VAWDASV specialist services have reported that, while they are funded to provide refuge and/or floating support to adult survivors, they receive little or no funding for supporting the children of adult survivors who also use these services in their own right. However this is not a consistent approach across RCC regions, with other specialist services reporting that the funding from Supporting People *does* cover the needs of both the adult survivors and their children in different local authorities.

Members have also raised differing approaches to commissioning, informed by varied levels of understanding VAWDASV and specialist service provision. There is wide consensus on the need for increase understanding within Supporting People teams of the importance and distinct nature of VAWDASV specialist services, of the nature and complexity of provision and of the expertise held by professionals working within VAWDASV specialist services. There are concerns regarding the

trend towards favouring contracting with generic services which are not equipped to deliver specialist support for VAWDASV survivors, yet they are required to provide services for survivors of abuse. The understanding of the need for VAWDASV specialist services differs across regions and leads to a postcode lottery of provision across the national network. One specialist VAWDASV service voiced concerns:

“We are feeling that Supporting People are pushing us as a domestic abuse organisation to be generic. We are not convinced that the Supporting People Commissioners are able to deal with domestic abuse in Supporting People which is a shame and this will cause problems for dealing with domestic abuse and access to housing for victims.”

Welsh Women’s Aid recommends

- The Supporting People programme criteria clarify that the fund can be used to support children and young people as well as their mothers who are impacted by domestic abuse and need housing related support, to ensure consistent support for children and young people who have been abused and to mitigate the trauma associated with such adverse experiences.
- Ensuring Supporting People teams better understand the importance and distinct nature of VAWDASV specialist services, of the nature and complexity of provision and of the expertise held by professionals working within VAWDASV specialist services ie that services deliver support within National Quality Service Standards framework and professional competencies align with National Occupational Standards for domestic and sexual abuse.

1.6 The extent to which the governance and management arrangements for the Supporting People Programme reflect the way of working expected in the Wellbeing of Future Generations (Wales) Act 2015:

A member of Welsh Women’s Aid SEEdS (Survivors Empowering and Educating Services) stated:

“I feel that measuring the Supporting People programme against the Wellbeing of Future Generations (Wales) Act 2015 principles is a very important task. However, other legislation is also part of the under-pinning too, such as the Housing (Wales) Act 2014 and the Social Care and Wellbeing Act (Wales) 2014.”

At present, it is difficult to see how the Wellbeing of Future Generations (Wales) Act 2015 *5 was of working* (Long Term, Prevention, Integration, Collaboration and Involvement) is reflected in the governance and management of the Supporting People programme, when viewed from a provider's perspective.

The way refuge-based support services are resourced via the programme in many areas of Wales (i.e. short term, funding time limited contacts with clients, not resourcing the support needs of children) does not reflect survivors' needs for *long term*, holistic support to meet their needs. Our most recent 'state of the sector' report also found that 500 survivors of abuse were unable to access refuge-based support last year because the support services did not have the resources and capacity to meet their needs. The programme's management should urgently review why 500 survivor of abuse are turned away from some of its core provision, when more strategic and joined-up investment could ensure services have capacity to meet the needs of survivors experiencing multiple disadvantage.

Prevention of violence against women, domestic abuse and sexual violence (as the root cause of much of women's housing-related support needs) is also not invested in by the Programme, given this would necessitate resourcing services to address gender and other intersectional inequalities between women and men. Some *collaboration* occurs with specialist services through RCCs and nationally, but greater strategic join-up is needed between VAWDASV strategic boards and RCCs, between the SPNAB and VAWDASV National Advisory Board and between the development of training, national outcomes and indicator measures, and national commissioning guidance development. Any work on promoting *involvement* by those responsible for governance and management of the programme must also ensure survivors of domestic abuse, sexual violence, honour-based violence, exploitation and harassment, be central to involvement strategies. This requires investment to ensure survivors are supported and empowered through this process.

With regards *integration*, the Wellbeing of Future Generations (Wales) Act 2015 seven wellbeing goals are all relevant to the prevention of VAWDASV and supporting survivors. The Wellbeing of Future Generations (Wales) Act is also underpinned by a commitment to delivering the international Sustainable Development Goals, one of which (SDG5) commits Wales to: "*Achieve gender equality and empower all women and girls.*" The 9 targets to be achieved, within

this, include the following, which we would expect the Supporting People programme to support delivery of:

- Ending all forms of discrimination against all women and girls
- Eliminating all forms of violence against all women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation
- Eliminating all harmful practices, such as child, early and forced marriage and female genital mutilation, and
- Adopting and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women and girls at all levels

Further, the revised 12 Well-being Goals published in the most recent National Well-being Statement that supports delivery of the Welsh Government *Prosperity for All* Strategy includes commitments to: (2) Tackle regional inequality and promote fair work; (5) Promote good health and well-being for everyone; (6) Build healthier communities and better environments; (7) Support young people to make the most of their potential, and (10) Build resilient communities, culture, and language. The *Prosperity for All* Strategy also encourages cross-cutting action to improve early years, housing, social care, mental health, skills and employability.

VAWDASV specialist services' primary function is to meet survivors' support needs whilst also delivery prevention work in local communities. This includes targeted support by and for BME women and communities, which is vital to address the needs of survivors of abuse and to deliver preventative work in BME communities. As such, they work towards delivering SDG5, and they address the root causes of problems associated with the most significant adversities in childhood, of homelessness, of one of the main reasons behind social care provision, of mental ill-health, and of women's and young people's skills and employability support needs; namely, domestic abuse, child sexual abuse, rape and sexual violence, sexual exploitation, risk of forced marriage or honour based violence, sexual harassment, modern day slavery and prostitution.

VAWDASV is a cause and consequence of inequality between women and men and has significant cross-cutting impacts on the health and wellbeing of women and children. The well-being goals in Wales cannot therefore be achieved without

taking urgent steps towards preventing and mitigating the impacts of the epidemic levels of violence against women, domestic abuse and sexual violence in every community in Wales. Welsh Women's Aid supported the Future Generations commissioner in her review of Public Service Board well-being plans and were extremely concerned that VAWDASV hardly featured in local population assessments. We would be concerned if Supporting People teams were to rely on these local population assessments which do not adequately reflect an assessment of the needs of VAWDASV survivors. Some members have made the point that the lack of sustainable funding in the VAWDASV sector works against the fulfilment of the Wellbeing of Future Generations Act's objectives:

"Sustainability is needed to ensure we see the impacts achieved. The current budget planning process does not allow for long term planning to enable assessments and impacts to be done and social value understood."

As the largest contributor to VAWDASV specialist services¹², the Supporting People programme has a significant role to play in making this a reality.

Welsh Women's Aid recommends that SP governance and management arrangements must:

- Audit how implementation of the programme and its delivery of the required 5 ways of working addresses the requirements to prevent violence against women, domestic abuse and sexual violence as required by VAWDASV Welsh legislation.
- Take action to improve investment into long term support for survivors including those experiencing multiple disadvantage, into prevention of VAWDASV, into a more collaborative approach with VAWDASV providers, and invest in support that enables involvement of survivors of abuse in the programme delivery and commissioning arrangements.
- Ensure the Supporting People programme strategically and operationally delivers Sustainable Development Goal 5, which underpins the Wellbeing of Future Generations (Wales) Act 2015
- Ensure the Supporting People programme recognises that to address the 5 cross-cutting priorities in the Government Strategy, it must prioritise

¹² Welsh Women's Aid, 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales', 2017.

VAWDASV specialist services as being core to its delivery programme. This must be accompanied by working strategically with other commissioners to ensure joint strategic investment to deliver sustainable funding for VAWDASV specialist services.

Question 2: Monitoring and evaluation

2.1 How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring:

Some members have told us that they feel that monitoring and outcomes data is only considered when undertaking service reviews and information is reported to the RCC across localities. Others have raised concerns that duplication of information requested is time consuming and often feels unnecessary, for example, one member said:

“We fill in more forms and spend more time doing it than our commissioner spends understanding the effectiveness...”

Services also state that the same information needs to be inputted into several different systems, reducing staff capacity that could be put to better use helping survivors accessing services:

“... why is some of this not fed through from [one system] so we do not have to keep data entering the same information.”

Survivors have also highlighted concerns around the specific data requested within the Supporting People programme:

“My response is more to do with 'what' data is being collected in the first place and how much of it draws on lived experience and those working at the grass roots level.”

The proposal to collect national insurance (NI) numbers as new unique identifiers was raised as a serious safety concern when we consulted with members and survivors over the Welsh Government’s Supporting People guidance and framework consultation in August 2017. Our concerns are as follows:

- Danger of being identified by perpetrators or friends/families who have access to the database;

- Survivors may be unlikely to have NI numbers with them when they enter services, if not memorised, as they leave their homes at speed;
- Some survivors including BME women and young people are less likely to have NI numbers;
- While everyone with access to the database will have been DBS checked, it is well evidenced that most violence against women, domestic abuse and sexual violence perpetrators are never convicted and a huge number are never reported to the police, so DBS checks can only ever show a very small proportion of perpetrators.

Most front-line staff from Welsh Women's Aid member services adamantly object to the use of NI numbers for survivors who are accessing Supporting People funded services. For example:

"I am concerned that this information will be used for purposes other than services tracking. There is the potential that authorities may look to cap service costs in the future and to financially disadvantage our clients (as we have already seen in the rape clause proposal) through linking it with the benefits system. Our clients are already disadvantaged and discriminated against via the Criminal Justice system, the Benefits system to name but a few and this seems like an unnecessary addition that provides greater risk and opportunity to exploit than benefit."

Welsh Women's Aid recommends:

- To inform needs assessments and recommissioning of services, monitoring and outcomes data should effectively capture VAWDASV specialist service data to ensure decision making is evidence-based and recognises the impact of specialist provision. This must be done in a way that is both focused on survivor needs and within the capacity of the VAWDASV specialist services.
- The national Supporting People database should be aligned with any parallel systems for collecting VAWDASV outcomes and indicators across all third sector specialist services, and with VAWDASV commissioning frameworks, which would be contributed to by multiple providers outside of Supporting People commissioning. To avoid duplication, further conversation is needed to ensure both systems compliment and add value to the other.

2.2 The proposed revised outcomes framework and the extent to which it will address the limitations of the current framework:

Welsh Women's Aid members noted that the revised outcomes framework is very ambitious in trying to fit the needs of all Supporting People service users throughout the 7 outcomes that are "most relevant" to the 60,000 individuals supported. We would urge that the approach is not "one size fits-all" as valuable data may be lost from VAWDASV services, as the seven proposed outcomes do not reflect the needs/specialisms within the VAWDASV sector, BME VAWDASV services in particular. Survivors 'feeling safe', for example, might be more to do with having had the perpetrator removed by the CJS and may not mean that their support needs have been met. As this data is likely to inform needs assessments and recommissioning of services it is vital that it is captured to ensure decision making is evidence based and recognises the impact and quality of specialist provision.

Welsh Women's Aid recommends:

- The Supporting People outcomes need to link in with the VAWDASV National Strategy 2016–21¹³ and the VAWDASV National Outcomes and Indicators currently in development.
- There needs to be more guidance around "people feel safe" as there is confusion as to when this should be measured. What is being measured should also be evidence of positive change created in a way that is person-centred, on a case by case basis.
- Monitoring data for refuge-based support services and other VAWDASV services funded by Supporting People must reflect the needs of survivors using those services and the nature of the services being delivered.

2.3 How any revised outcomes framework arrangements can be best communicated and embedded:

As the national umbrella organisation of the VAWDASV specialist sector in Wales, Welsh Women's Aid can support information dissemination to these organisations. Members have requested email updates and regular correspondence regarding revisions and changes to the framework from Welsh Government, as it is so essential that the VAWDASV specialist sector knows about any revisions to the

¹³ Welsh Government, 'National Strategy on Violence Against Women, Domestic Abuse and Sexual Violence 2016-21', *Welsh Government*, 2016, <http://gov.wales/docs/dsjlg/publications/commsafety/161104-national-strategy-en.pdf>, [accessed 18/07/17].

outcomes framework arrangements. Welsh Women's Aid could help coordinate this communication through our role.

2.4 Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services:

There is a call from VAWDASV specialist services for greater consistency across Wales in terms of the type of data that is collect, what are direct and indirect costs and expected impacts/outcomes required in the monitoring and evaluating of the Supporting People programme. In addition, a survivor has said that:

"This for me would link in with the tendering and re-tendering processes. If organisations have to show budget breakdowns and their reasons, this will highlight the balance between value for money and a quality of provision that is high enough to be effective. Failures due to poor service and lack of funds is all too familiar a story."

Question 3: The distribution of Programme funding and financial planning

3.1 The issues that need to be considered in developing and implementing a new funding formula:

Welsh Women's Aid would like to see a new funding formula that includes ring-fencing for VAWDASV services and protects the national network of refuges that are so essential to protecting survivors of violence and abuse. While some member have called for more information, others have suggested a model that ensures "VAWDASV specialist services are enshrined in any funding considerations."

Another VAWDASV specialist service stated that:

"The lack of uncertainty of future funding does not allow for consistency of service delivery, specialist providers will and are disappearing, skills and knowledge gaps will develop and the impact on the public purse will increase as more pressure will fall onto other public services."

This was supported by feedback from survivors that said:

"Service providers need to be able to plan ahead, so re-instating 3-year allocations is the starting point for this."

A smaller specialist organisation has also said that it would be helpful if some funding was available to smaller VAWDASV organisations who support people with multiple disadvantages, either directly or by working in partnership with others.

3.2 How budget pressures and funding uncertainties have affected service planning and delivery:

Welsh Women's Aid has carried out research with our members into the current budget pressures and funding uncertainties for VAWDASV specialist services. Our *State of the Sector* report¹⁴ published in December, noted the impact of year on year losses either as a result of direct cuts to grants or years of standstill funding. It noted that while the overall funding for Supporting People was maintained in 2017/18, there was a 4% decrease in total funding for VAWDASV services from the Supporting People grant.¹⁵ This has direct impact on the provision on service for survivors of VAWDASV; 500 survivors (456 – 90% were women) were unable to be supported in refuge because of a lack of service resources or capacity.¹⁶

Welsh Women's Aid members have highlighted that short term planning is not suitable and could impact on the quality of provision for VAWDASV survivors. One service has voiced concerns shared by many:

"We have no idea if we will get Supporting People funding next year. Our workers have not had a pay rise in 3 years so are still payed at basic rates. We cannot increase rents to deal with the increases in electricity, costs of council facilities yet we are asked to do more under contract. Supporting People does not pay for any of our monitoring costs."

A survivor, who accessed temporary accommodation when leaving an abusive relationship, has stated:

"It leaves VAWDASV organisations (and particularly dedicated staff members) feeling their hands are tied when implementing actions because they do not know if they will be able to complete them."

Another specialist VAWDASV service has said: *"Budget pressures and funding uncertainty affects service delivery, much mitigated by professionalism and maturity of the sector working together to maintain value for money, strategic*

¹⁴ <http://www.welshwomensaid.org.uk/wp-content/uploads/2017/12/WWA-State-of-the-Sector-2017-ENG.pdf>

¹⁵ Welsh Women's Aid, 'Report to National Task and Finish Group to inform the development of a Model for Sustainable Funding for VAWDASV Specialist Services in Wales', 2017.

¹⁶ Welsh Women's Aid, 'Summary of 2016/17 Data from Specialist Services in Wales', 2017.

planning, commissioning and procurement to try and stabilise good service provision. But uncertainty and cuts planning, annualised budgets does result in some knee jerk commissioning impacting upon operational delivery.”

The evidence from VAWDASV specialist services in Wales is that there is a lot of uncertainty of the funding landscape moving forward, with proposed changes to Supporting People and other VAWDASV grants from Welsh Government, and continuing competition for ever more limited funding. This is all occurring in a context of increasing need for specialist support for survivors of VAWDASV. A corresponding increase in the presentation of complex needs and multiple disadvantage means some specialist services are struggling under the strain of a lack of capacity. For specialist BME, children and young people and disability services, this adds an extra level of pressure to their services to ensure need is properly evidenced and accepted for these groups. Survivors are accessing specialist services with increasingly high-levels of support needs as a result of their experience of abuse, which intersects with living with severe and multiple disadvantage. Many services do not always have sufficient resources or capacity to deliver the level of sustained intensive support needed in these cases.

The Welsh Government has outlined a national commitment to delivering sustainable funding for VAWDASV specialist services within the National VAWDASV Strategy 2016–21, in which Supporting People Programme Grant has a critical role to play. Welsh Women’s Aid has mapped the resources funding the VAWDASV specialist services in Wales for Welsh Government, to inform this work. We now need this commitment to be delivered, across government – in a way that includes the Supporting People Programme – to ensure this becomes a reality.

3.3 Reasons for the identified wide variation in financial support for different client groups across local authorities:

Our members have stated that there are various reasons for this, “from multi/complex high needs vs low level needs, peripatetic services vs accommodation based costs, engagement rates across client groups, clients in situ vs non-additional investment streams.”

A domestic abuse survivor stated:

“This is about quality of provision. If it is not sufficient, i.e. if staff are not sufficiently qualified and experienced and their salary reflects this, if one-to-one

support time is limited, and so on, those moving through the system into independence fail and end up back in the supported accommodation system all over again. So I would want to look at the difference in amounts of financial support against the level of support provided. Cuts and savings often lead to greater expense in the longer term.”

Differing client groups funded within the Supported People Grant require differing interventions and levels of support. VAWDASV support requires specialist provision that provide strengths-based, needs-led, trauma informed approach for supporting survivors and their children to build resilience and foster independence and freedom from abuse. As stated earlier and reiterated by the survivor feedback above, this investment in the short term in early prevention and effective support will lead to greater savings and value for money in the long term. VAWDASV specialist services ultimate aim of reducing the number of survivors and children living with abuse and the long term costs associated with abuse to survivors, services and society.

Investment in to provision must be appropriately matched to the needs of the client group and achieving long term positive outcomes.

3.4 Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support:

One member stated that contractual changes are having an effect on supply mapping, noting for example the move from sheltered to tenure-based services to peripatetic floating support, in addition Supporting People contracts are based on hours or flexible floating support and only referencing fixed sites.

This trend is often based on the false perception that floating support is more cost effective and is a preventative approach to housing needs, however this is not based on the needs of survivors of VAWDASV. Survivors who chose to go into refuges do so because it is the safest place for them and their children and offers a package of needs-led support including advocacy, advice, group work and child support that enables them to achieve long term outcomes, and which proves cost effective in the long run. Further to this, preventative support can encompass ‘fixed’ refuge provision as it prevents further abuse, and the support provided can prevent a number of negative outcomes.

3.5 The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns:

Feedback from some Welsh Women's Aid members stated that local and regional planning process and spending simply did not reflect well-evidenced needs. This again is reported as a postcode lottery, with some areas raising concern about *how* needs assessments are carried out to inform commissioning. This is of particular concern to specialist services that have not traditionally been locally funded, for instance BME specialist services. There is a need for a consistency in approach the assessment of need that takes into account the national picture as well as local need. There are concerns that some Supporting People commissioning processes do not seek to identify hidden or unsupported needs and therefore expand the reach of Supporting People but focus on people or providers 'that have used Supporting People' services/funding previously. It is suggested that Supporting People should be ambitious in its aim to reach further than it previously has, in order to connect with potential clients whose needs are not currently being met.

Commissioning guidance will be vital to ensure that the planning processes are effective and based on well evidenced need. Welsh Government is currently drafting statutory commissioning guidance for VAWDASV provision, this should inform the planning processes in local and regional areas and hold them to account on effectively assessing need and commissioning well evidenced provision. To do this Supporting People Teams will need to consult with the VAWDASV specialist sector and survivors. Local authorities are also developing VAWDASV strategies and commissioning plans and it will be critical that Supporting People Programme planning processes and spending are integrated within these.

Welsh Women's Aid and VAWDASV specialist services across Wales have contributed to the production of the VAWDASV commissioning toolkit, supported by Welsh Government and written and published by Lloyds Bank Foundation.

We recommend

- The VAWDASV commissioning toolkit is promoted to Supporting People leads and regional development coordinators to inform good quality commissioning (including needs assessment) and procurement of VAWDASV specialist services. The guidance can be found here:
http://www.welshwomensaid.org.uk/wp-content/uploads/2016/03/VAWDASV-Toolkit_Wales_web.pdf

Tai Pawb is a membership organisation, with over 70 members from housing, equality and related sectors. Majority of our activities focus on the housing management role of social landlords. Several of our members are support providers and support providing arms of housing organisations. We have trained and supported those organisations in relation to their equality obligations and best practice in the past and we also have a place on the Gwent Regional Collaborative Committee. Our understanding of the supporting people funding and consequently the response to this inquiry should be viewed in this context.

1. Welsh Government proposals to remove the budget ring fence for Supporting People in April 2019.

Whilst Tai Pawb welcomes approaches which would allow for alignment of strategic priorities and reduction in bureaucracy, we also understand concerns about what this move might mean for the long-term protection of funding for housing-related support in Wales.

We would echo concerns expressed in other evidence submitted to the committee, including the response from Cymorth Cymru. In order to avoid duplication, we will not be expanding on well evidenced arguments submitted by other organisations and referenced in their submissions. The key points are supported by hard evidence of real negative impact of a similar decision in England, including:

- reductions in grant of up to 80% in some areas
- a vast reduction in targeted and specialist support (e.g. support for Rough sleepers, reduced from 28% to 7%; People with mental health problems, reduced from 22% to 4%, Prisoner leavers, reduced from 16% to 1%.)
- several groups going from previously targeted services to having none including sex workers, refugees, irregular migrants and disabled people.
- Local Authorities using flexibility to prioritise statutory services often to the detriment of supporting people services

The last point in particular can be a difficult one to argue, especially in light of the short term nature of funding and therefore monitoring and evaluation of the impact of non-statutory services. The details of the impact of SP services have been well documented by Cymorth and Gwent RCC in their responses. The key point for Tai Pawb is that an investment in preventative and early intervention focused SP services can reduce the demand for statutory homelessness and other services which are often used to treat symptoms rather than causes of homelessness and are often used at a point where the damage to an individual and/or their family has already been done or the risk of such damage is much greater.

It is our understanding that the main focus of the SP programme is on prevention and early intervention. This role is especially significant in the context of the changes to the homelessness legislation, with increased focus on prevention, changes in the role and culture of the homelessness and housing options teams. The new homelessness prevention duties have so far proven successful in preventing people from becoming homeless but they have also added pressure on homelessness teams, for example in terms of the numbers of people approaching local authorities and the increased intensity of service provided to those people.

Supporting people often prevents people from becoming homeless before they reach the statutory homelessness stages and can therefore be understood as having a very significant impact on not only the lives and outcomes for vulnerable service users but also as an important lever in relieving the pressure on local authorities' increasingly stretched homelessness services. In fact there is an argument for any new SP and Homelessness Frameworks to take into account, measure and monitor SP support as part of the homelessness statistics monitoring.

Therefore, we believe that any concerns related to the potential for supporting people funding to be reduced as a result of the development of a potential super-grant should be given serious consideration as the impact of any reduction in funding can have serious consequences for service users and lead to an increase in homelessness.

The above concern is all the more pertinent as most of the groups supported through the programme are not only vulnerable but also share a protected characteristic and have been targeted by the programme due to evidenced need, including lack of or gaps in service provision elsewhere. This includes women suffering domestic violence and abuse, young people, refugees, Gypsies and

Travellers, people with mental health issues, with learning disabilities and age-related vulnerabilities.

Any decision leading to a potential reduction, realignment of funding or provision of more generic services in favour of specialist support should therefore not be made before considering the equality and human rights impact of such decisions on those groups of people and whether any potential reductions can be considered as a proportionate means of achieving a legitimate aim. The needs of the above groups are often such that a specialist service is the only legitimate way to deliver support.

A successful legal challenge brought in by the clients of Southall Black Sisters against Ealing Council ¹ is one example of a case where assessment of equality impact was poor and a decision was made to remove a specialist BME service in favour of a more generic service to women experiencing domestic abuse. This decision and lack of appropriate assessment (as well as poor quality of equality evidence used) was legally challenged and overturned.

We understand that the Full Flexibility Pathfinder pilot will run from April 2018 to March 2019 with the proposal to implement the super grant from March 2019 to April 2020. It is questionable to what extent the pilots would actually serve their purpose and how meaningful monitoring and evaluation of the pilots (including equality aspects) could take place in order to inform the development of the super grant system being rolled out immediately after the pilots.

There is therefore little scope for the pilots to inform super grant framework in any meaningful way. There would also be no time to undertake an equality impact assessment based on real evidence (especially that the equality data collected during the pilots would be very extensive and complex considering the scope of the new grant) and for this assessment to influence or inform any meaningful decisions. The tight timescales therefore carry a real risk of contributing to the contravention of the Equality Act 2010.

There are of course potential benefits to developing a super grant system including less bureaucracy, flexibility between different streams and a much more integrated

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<http://www.bailii.org/ew/cases/EWHC/Admin/2008/2062.html>

working. Any new potential framework however, would need to be based on an extremely comprehensive needs mapping and population wide evidence across a multitude of different needs and vulnerabilities.

The real danger of having a combined assessment of needs to establish the basis for grant distribution model is the temptation to avoid inadvertent complexities linked to specific needs (which can often only be well understood by specialist SP staff). Generic needs assessments run the danger of missing the detail needed to explore the needs of specific populations and of course a big needs assessment can often miss things and people out (especially where certain populations are consciously or subconsciously perceived as less deserving and have to compete for funding with groups which are much more likely to gain public support).

A decision of how a grant stream is to be distributed when the grant is focused on such a multitude of groups is therefore fraught with difficulties. The potential for a reduction in SP teams can mean that expertise needed to develop evidence based policy simply won't be there, and this includes the necessary involvement of service users in planning, commissioning etc.

2 Programme Objectives

Here we would like to support Cymorth's members' views in relation to specialist services for people with learning disabilities and older people and the need for these to be perceived as part of the core purpose of the programme in terms of preventing homelessness. Interim findings from Welsh Government's own learning disability transformation programme highlight the need for awareness, recognition and support for people with learning disabilities who are at risk of experiencing homelessness. For example, the link between autism and homelessness has been documented by Shelter Cymru².

2

<https://sheltercymru.org.uk/wp-content/uploads/2015/02/Piecing-together-a-solution-Homelessness-amongst-people-with-autism-in-Wales.pdf>

The WLGA has provided verbal evidence to the Committee as part of their Inquiry at their meeting on 27th November, which was supported by some initial written evidence. This response builds upon the previous evidence submitted.

Introduction

Local authorities highly value the Supporting People Programme and it provides a range of valuable and necessary housing-related services to support people to live independently and maintain their tenancies. While funding levels for the Programme have reduced over recent years primarily as a consequence of austerity, we recognise that Welsh Government has tried to protect the funding levels as far as possible, particularly given the positive impact of the Programme working with a range of vulnerable people.

With such a significant investment, it is right that the Programme has been reviewed both by Professor Aylward in 2010 and the Wales Audit Office more recently. Other pieces of work have also been undertaken during these times, with the aim of strengthening the governance arrangements and to evidence positive outcomes of the Programme. However, the arrangements remain complex, are not well understood (or commonly understood) despite these reviews and amendments to the operation of the Programme. The findings of the WAO reinforce these views and while SP services are crucial in assisting a range of vulnerable people, further work is required in clarifying the objectives and management of the Programme and this will assist in raising awareness and spreading confidence and outside of the sector as to the important role housing-related support provides in helping people maintain their independence.

Since the publication of the Wales Audit Office report Welsh Government has announced its intention to form a Prevention and Early Intervention Grant comprising of different funding streams, including the SP Grant. It is unclear at this time what the implications of these changes will be on the operation of the Programme, however it is hoped that opportunities to embed housing-related support within a broader context of supporting vulnerable people in a holistic way will be maximised, with stable housing being a key requirement and basic human

right for all. In moving forward, it is necessary to consider delivery of SP services within a broader context and its contribution to the wider goals and aspirations for Wales as set out in the Well-being of Future Generations Act, ensuring that housing-related support is provided to those who need it, and valued for its contribution to the achievement of these goals.

The impact of wider policy developments on the programme

We welcome the development of revised guidance and new strategic objectives for the Programme, and hope that these will bring greater and refreshed clarity to the aims and purpose of the Programme. The Auditor General's Report rightly identifies the key legislation and policy reforms relevant to the Programme, at the time of writing, all of which are evolving as implementation of each is taken forward, and the inter-relationships between them becomes more evident, for example, how the Programme can be better aligned with the Well-being of Future Generations Act. The overall context within which the Programme operates is both complex and evolving, and needs to be kept under regular review in order to ensure that the Programme continues to be effective and efficient and appropriately fits with the new developments, including proposals for local government reform.

Within the Supporting People Programme there are a broad range of services and types of services commissioned for a wide variety of vulnerable clients. Expectations of the Programme are considerable, understandably so given the relative size of the budget. However, these expectations have increased over time with the Programme being seen as necessarily contributing to the resolution of a successively wider range of issues as Welsh Government policy has developed. As recognised in the Auditor General's Report this can result in tensions between the outcomes of local and regional needs assessment and service planning, and expectations required by Welsh Government.

- The overall clarity of the Programme's objectives

It is well understood that the SPP provides housing-related support to help vulnerable people to live as independently as possible, however, we would agree that further clarity on the aims and purpose of the Programme would be beneficial. We welcome the development of new strategic objectives that were consulted upon earlier this year and believe that these reflect the current but would also highlight the difficulty in needing to respond to a changing and evolving legislative and

policy context and in highlighting the added value' SP services can do provide. However, these objectives should remain the same for a period of time (and be well communicated) so that there is long-term clarity on the purpose of the Programme and services to be delivered and the expected outcomes to be achieved to meet these objectives.

The six stated aims of the Programme may be less understood, inconsistently applied or are actually out of date in the current vision for the programme and the development of its strategic objectives and these should be revised in line with the new objectives.

- The implications of, and emerging response to, the UK Government's Supported Accommodation review

The recent announcement from the UK Government relating to future funding for supported accommodation is significant and will need to be taken into account in any future plans for the SPP (see further information below). The WLGA will continue working with Welsh Government and other stakeholders in discussing options for taking this change forward in Wales.

- How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments

In our view that Welsh Government communicates well with the SP sector but would suggest that further work is required in communicating outside of the sector, with other areas that would benefit from a better understanding of how SPP services contributes to their work and achievement of outcomes. As an example, the Supporting People Bulletin published by Welsh Government provides an update on developments and matters of interest to the delivery of the Programme but it would also be helpful if the updates also referenced the potential impacts or benefits to the SPP to better highlight linkages and opportunities for join-up. More specific briefings on key matters of interest to the SPP would also be beneficial.

- How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements

Before considering how RCCs may best align with other regional arrangements, the question as asked by the WAO review is whether RCC arrangements remain fit for purpose in the context of other collaborative governance arrangements. It is clear that despite reviews and the introduction of a MoU, confusion still exists around

the role of RCCs that need to be clarified – is their role to scrutinise local authorities, are they a decision-making body or is their role to drive regional collaboration or all three? It must also be recognised that local authorities remain accountable for the spend of the SP grant they receive. As is highlighted in the WAO report (para 2.11), the main concerns and challenges identified in the 2014 Independent Review about the effectiveness of RCCs remain and have not yet been fully addressed.

Given the cross-cutting nature of the SPP, there is a need for the work of RCCs to link into and influence a number of other groups that exist, for example, Public Service Boards, Social Services Regional Partnership Boards, Community Safety Partnerships to name just a few, however, some of these are local groups, while others are regional, adding to the complexity of making appropriate links. The local/regional/national landscape is currently extremely complex and crowded and the SPP operates and is governed on all 3 levels at present, which is complex in itself. While these arrangements reflect the Aylward recommendations, much has changed since 2010 and it would be timely to review these arrangements to assess whether they remain fit for purpose or are the most effective way to manage the SPP and make effective links to other related work.

Local government reform proposals, with the aim of encouraging/mandating regional working, would also introduce different governance arrangements to how RCCs have been established through Joint Governance Committees. The new grant arrangements may also necessitate to some change to the role of RCCs. All of these changes will need to be considered moving forward, and the basic role and purpose of RCCs will continue to need to be clarified in how they fit and link to other groups to raise awareness of how housing-related support and SP services can support their work.

- The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years

While there has been some criticism as to the limited development of cross-boundary or collaborative working between local areas that has been evidenced over recent years, in some ways, the specific and prescribed requirements to be met by RCCs, in terms of governance and reporting may have hindered rather than encouraged regional working. As an example, the region of Gwent has developed less regional working since RCCs were required in comparison to the collaborative

working that emerged when the arrangements were voluntary as more time is now spent meeting bureaucratic requirements of RCCs.

Anecdotal evidence reflects that working collaboratively works better when it has evolved naturally in response to an identified need/evidence that benefits will be gained rather than being required to work collaboratively when no potential benefits (either saving money or delivering better outcomes) have been shown to be achieved. More work is required to evidence 'what works' from increased regional and collaborative working that can be used as a spur to encourage further change.

- The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015

This is an area where further development is required. While many of the ways in which the SPP is delivered align with the Act, for example, identifying sustainable longer-term solutions, taking a preventative approach, the involvement of service users, identifying specifically how the SPP also contributes to the well-being goals would also be beneficial.

Monitoring and evaluation

While local authorities and partners fully understand the need to provide evidence of the impact of the Programme (particularly to highlight the benefits of the programme and to ensure the continuation of budgetary levels during a period of reducing overall resources), it should be recognised that evidencing positive outcomes of a Programme that works with such a diverse group of individuals, with a diverse range of support needs, is inherently complex. Outcomes achieved are multi-faceted and therefore it is often difficult to evidence the impact purely in numbers, especially around individual and personalised outcomes. As concluded within the report, the use of case studies provides examples of very positive qualitative indicators to illustrate the effectiveness of the Programme for some individuals and groups. We welcome the revision of the current Outcomes Framework.

All stakeholders are committed however to evidencing the real and positive impacts that SP services achieves with individuals and communities and both qualitative and quantitative methodologies should be used to better reflect the

impact of the Programme and the outcomes that are achieved. There are numerous outcomes frameworks that could possibly be better aligned, also assisting with reducing bureaucracy and administrative processes and over time, the new Grant arrangements may enable such an approach.

The distribution of Programme funding and financial planning

It is widely accepted that the current distribution of funding is based on historical patterns and there is acceptance that this situation needs to change so that funding distribution better reflects needs across Wales. However, redistribution of funding becomes more difficult within a reducing funding envelope and a key consideration in discussions about redistribution has been the need to not destabilise the market or reduce/remove important services delivered to vulnerable people without appropriate time to plan for changes. As such, until it was paused, redistribution was taking place over a number of years so that authorities had time to plan effectively for both reductions in funding but also importantly planning for growth in funding and the commissioning of new services.

The introduction of a new funding formula for the SPP would add complexity and challenge to a continuation of redistribution of funding and would likely bring significant change in funding levels that would need to be strategically and effectively managed over a period of time. However, it is accepted that a new formula that better reflects the objectives of the Programme is needed.

- The issues that need to be considered in developing and implementing any new funding formula

The WLGA has been involved in discussions about the potential for a new funding formula for the SP Grant since the Aylward Review. It has been clear at all stages that the development of a new formula is complex and it will be very difficult to satisfy all expectations. We agree with the WAO recommendation that any new funding formula should be based on the new strategic objectives for the Programme. However, it must also be recognised that a new funding formula, along with redistribution of funding based on need rather than historical patterns, is likely to bring significant turbulence to funding levels and this needs to be effectively managed to ensure such changes can be appropriately planned for and implemented.

We will work with Welsh Government, SPNAB and other stakeholders in the development of any revised funding formula but would also suggest that it would be beneficial to involve the Distribution Sub Group, a group of experienced WG and local government finance officers, along with independent experts, who advise on formula and redistribution changes across local government. A phased approach to the introduction of a new funding formula will be needed to ensure turbulence in funding levels does not destabilise the market or remove services from vulnerable people without effective planning.

- How budget pressures and funding uncertainty have affected service planning and delivery

As with any funded programme, confidence in future funding levels will assist with longer term and more strategic financial planning, both by authorities and providers, particularly if funding levels are reducing. We agree with the assertion in the WAO report that annual funding allocations, with uncertainty around the possibility of funding reductions, has had the effect of hampering local planning and service development in some areas and we fully support the implementation of Recommendation 1.

Other comments:

The UK Government's recent announcement relating to funding for supported accommodation is also significant to the future funding and financial planning arrangements for the Programme, with funding for short-term supported housing (yet to be fully defined) likely to be removed from the welfare system and devolved to Wales. This will include both core rent and additional housing management costs meaning all the funding of these settings will be within Welsh control. In England it is intended to make this funding available to local authorities as a ring-fenced grant from 2020. Detailed arrangements for Wales have yet to be decided. The recent realignment of officials' responsibilities within the Welsh Government's Housing Policy Division, which now brings together responsibility for the Supporting People Programme and the outcome and implementation of the UK Government's Supported Accommodation Review is welcomed.

The recent announcement by Welsh Government around Funding Flexibility is significant for the future funding and financial planning aspects of the Programme. Seven local authorities that piloted a grant alignment project are identified as Full Flexibility Pathfinders with flexibility across Supporting People, Families First,

Flying Start, Communities First Legacy Fund and the new Employability Grant (and a range of other grants are also under consideration for inclusion). Feedback from those authorities participating in the alignment project indicated a clear appetite for increased flexibility, reduced bureaucracy and grant structures that support and promote better joint planning and commissioning.

The Full Flexibility pathfinder will give 100% flexibility across grants in order to achieve increased programme alignment, make more effective use of funding and meet local needs. This greater financial freedom and flexibility is expected to enable pilot areas to work differently, giving more scope to design services to support the Welsh Government's drive for more preventative, long-term approaches.

In the remaining fifteen local authorities, it is proposed to give "extended flexibility" of 15% across Supporting People, Flying Start, Families First, Communities First Legacy Fund and the new Employability Grant with the aim of allowing those authorities to plan more strategically, align programmes and deliver more responsive services to meet the needs of their citizens. It is intended that both Full Flexibility and Extended Flexibility are introduced from April 2018.

The WLGA is aware of concerns that have been raised by some that the inclusion of SPP funding within these new grant arrangements will dilute the focus on housing-related support or may divert funding for other services. However, from the experience of the existing Pathfinders, these concerns cannot be evidenced and may instead be based on unfounded fear of change or mistrust of local government. The WLGA believes that the new Grant arrangements should offer opportunities for better linkages between the various Programmes, enabling a more holistic approach to addressing the multi-faceted needs of individuals and families through better and more integrated commissioning of services. The WLGA is keen to work with WG and all stakeholders to ensure that the importance of housing-related support is well understood and equally valued by those outside the sector and in ensuring that the benefits of a more integrated approach through the new grant arrangements is of benefit to service users of SP services.

The impact of wider policy developments on the programme including:

- The overall clarity of the Programme's objectives;

The Aylward Review did leave the programme with clear direction but a lot of the good intention on this seems to have been lost on implementation.

- The implications of, and emerging response to, the UK Government's Supported Accommodation review;

This review will have a massive impact on the supported housing sector in different ways. Firstly the Sheltered and Extra Care rent seems quite contradictory of the recommendation in the Aylward Review to break the tenure link. In Merthyr this link has been broken and older people living in any type of accommodation/tenure are able to access supporting people services. Everyone across Wales felt that this was a very positive recommendation and yet this does not seem to have been accepted at a UK parliamentary level.

The short term accommodation is the major concern as despite the fact that the Welsh Government put a senior civil servant on the job of looking into the whole structure for Wales this individual has now take over as the head of the supporting people dept. Although the Welsh Government said this was done because of the closeness of the posts the supporting people is too small and this will become a massive piece of work.

While status quo remains in the long term accommodation the most important thing about this arrangement is that all of the social housing sector were removed from the local housing allowance.

- How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments;

There needs to be an improvement in the communication between Welsh Government, the authorities and the organisations working with the client groups. As an example, the new Supporting People Guidance (which initially saw significant

delays) was released with a consultation period, to which we provided a response to and are awaiting any feedback or revised publication. The Guidance is the most important way to communicate with all parties and at the moment we are working to Guidance from 2013 introduced to meet the Aylward review and the unification of the two pots and transfer to the authorities. This Guidance was also released prior to important legislation and the impact on the programme including the Housing Act Wales, the Social Services and Well Being Act etc.

It is the dedication in this authority, of the supporting people team and the planning group that keep the programme moving forward successfully.

- How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements;

Very difficult to comment on this as each RCC has been doing things differently and are of a very different and diverse nature. Cwm Taf is fortunate in that it is only made up of two authorities with similar challenges despite the difference in size of the authorities. However this good work could all be lost if the intention is to add Bridgend into the RCC area.

It is fair to say that all RCC's started from a different point; the Gwent authorities have worked together successfully over many years not only on supporting people but other social welfare and housing projects and developments. The north Wales authorities have also developed close links over the life time of the supporting people programme commenced in 2003. Clearly these two RCC's were initially more advanced than the other RCC's which were created in 2013.

An exercise could be carried out to map the existing regional boards/fora to ensure the RCC complements existing work and builds on this to maximise the impact of the Supporting People Programme.

- The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years;

We need to highlight the difficulties/complexities of regional working despite a small number of authorities. There are some draw backs in this type of working in terms of size of authorities, working with different partners, more than one master i.e., so who owns the scheme, funding proportions, monitoring and evaluation. The areas have different approaches to unit cost calculations, how support is funded (i.e.

unit/hourly rate) which do cause some issues. However where regional working will benefit the service users, the authorities are keen to explore and work through any potential barriers.

2. Monitoring and evaluation including:

- How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring;

There has been no expansion in the programme over the last several years and generally investment in services is only available due to two circumstances:

1. Better use of the current fund, in Merthyr we are moving to a pricing policy which will eliminate all of the anomalies which were created by the piece meal way that additional grant funding was passed to the authority from the Welsh Government over several years.

2. By de-commissioning services where there isn't a need for them and reinvesting the money, although the outcomes would be important in this there would be many other reasons for taking this decision and the main one would be what data we are collecting on the main needs that are being presented to us by applicants for a service.

- The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework;

The revised framework will lead, hopefully, to less bureaucracy but the system is and always has been flawed and clearly just does not fit some client groups i.e. older people and those with a learning disability.

- How any revised outcomes framework arrangements can be best communicated and embedded;

The best way to do this is to scrap the current system and spend some time devising a new system which people and organisation can be part of. We felt that the idea in the Supporting People Guidance this year that the Welsh Government should top slice money to devise a computer system was poor and more flexible approaches should be considered in the future.

- Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services.

The value for money issue has been dealt with in this authority by the introduction of a Pricing Policy and as such it does not need to be part of the monitoring and evaluation. The new Guidance that was issued had no mention at all about monitoring and guidance and removed the system laid down in the 2013 Guidance which is used in this authority and has been found to be effective, Regular monitoring and evaluation in an authority means the authority know who is working well and who needs to be brought up to a required standard .Regular monitoring and evaluation could be included in the Grant Conditions.

Regular monitoring and evaluation is a huge resource issue and many supporting people teams are short of staff due to the Welsh Governments insistence on the fact that none of the grant should be spent on staff, this was an issue raised in the Welsh Audit office report. While recognising the Welsh Government's concern there must be some flexibility in this area.

3. The distribution of Programme funding and financial planning including:

- The issues that need to be considered in developing and implementing any new funding formula;

Two major issues are; 1. How do the authorities that lose money cope and how do they decide which services to get, and; 2. Can the authorities who are to receive the money efficiently spend it? This would suggest that there many need to be a long (perhaps 2 years) lead in time.

- How budget pressures and funding uncertainty have affected service planning and delivery;

The budget pressure mostly has come from the fact that over last five years we have been facing cuts which as is the case now have not materialised. However this has made everyone from local authority teams to support providers being very nervous which has limited innovation and improvements. The major concern at the moment is the idea that the supporting people fund is being taken away from its roots in housing and merged with other pots with no clear lead from the Welsh Government and why and how it will work. Where will the money from the Supported Accommodation review go? Cwm Taf is one of the flexible funding pilot areas, where there will be full cross funding before the full implementation in

2019/20 but we feel that an evaluation would be useful before moving forward to allow for lessons learnt and maximise multiple programme impact?

- Reasons for the identified wide variation in financial support for different client groups across local authorities;

Much of this is historical and has resulted from the previous, more generous SPRG tariff levels.

- Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support;

Mainly concerns around the supported Accommodation Review.

- The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns.

This situation varies from local authority to local authority. In this authority this was identified as an issue ten years ago and a system of data collection from people applying for supporting people services was created. This was done to address the question of providing services based on need and not on anecdotal evidence or those who put themselves forward.

Introduction

1.1 This written consultation response follows the advance paper and oral evidence we presented to the Committee on 20 November 2017.

1.2 As well as responding to the questions posed by the Public Accounts Committee, we have also addressed issues relating to the Welsh Government's draft budget and funding flexibility Pathfinders, which effectively remove the ring-fence around Supporting People funding in Wales. We believe that this could have disastrous consequences for the most vulnerable and marginalised people in Wales. It risks vital services for people at risk of or experiencing homelessness and housing problems at a time when it is widely documented that homelessness is increasing. We do not believe there is any evidence to support this decision; in fact, it flies in the face of evidence from across the border which shows that services faced huge cuts when the ring-fence was removed in England.

2. Welsh Government draft budget and funding flexibility pilots

Background and analysis of Supporting People budget for 2018–2020

2.1 On 1 October 2017 the Welsh Government and Plaid Cymru announced a two-year budget deal that included the following commitment:

*No cuts to the Supporting People grant – an additional £10m will be invested to maintain funding at 2017–18 levels.*¹

2.2 We were aware that the Supporting People (SP) Programme had been facing a £10m cut prior to the completion of budget negotiations. However, the budget deal meant that it would be protected at 2017/18 levels (£124.4 million) during 2018/19 and 2019/20.

2.3 However, on 24 October 2017 the Welsh Government published its draft budget detailed proposals. In this document the SP budget line for 2018/19 stands at £124.4million, but in 2019/20 it is £0. Instead, the funding for SP had been merged with funding for other programmes, including Flying Start (FS), Families First (FF), Communities First Legacy (CFL) and an employment grant. This newly

merged budget line is called 'Early Intervention – Prevention and Support' but is £13m less than the combined total of these budget lines in 2018/19.

2.4 Ministers have stated that no final decisions have been made about whether to merge these programmes into a single grant in 2019/20. However, preparatory work towards the creation of a merged grant for 2019/20 is currently underway. The consideration of a merged grant and no clarity about how this would operate means that 0% of funding for SP services is guaranteed during 2019/20. There is no doubt in our minds that this breaches the budget deal.

2.5 On 24 October 2017 the Welsh Government also published a letter to local authority chief executives, which announced the creation of seven Full Flexibility Pathfinder local authorities. The letter stated that these 'Pathfinders' will be given 100% spending flexibility across SP, FS, FF, CFL and the employment grant during 2018/19. The remaining 15 local authorities will be given 15% spending flexibility across the above grants.

2.6 Based on the allocations in the 2015/16 SP spending plans, this would give local authorities spending flexibility for approximately 48% of the funding allocated to local authorities for the delivery of Supporting People services in 2018/19. This is in stark contrast to the assurances given in the budget deal which promised that £124.4 million of SP funding would be protected.

2.7 Since we gave oral evidence to the Public Accounts Committee we have discovered that the Welsh Government is now planning to give the seven Pathfinder local authorities 100% spending flexibility over ten grants, rather than the five stated above. The additional grants include the Homelessness Prevention Grant, which is also of concern to us.

2.8 We believe that the details above clearly breach the budget deal. Our members, including people using services and working for support providers, registered social landlords (RSLs) and local authority SP teams, have told us that they feel betrayed and lied to by politicians who gave them assurances about SP spending for the next two years. We have written to Ministers and urged the Welsh Government to rectify this by:

- Removing Supporting People from the Pathfinder projects in 2018/19

- Re-introducing a specific budget line for Supporting People in the 2019/20 budget with a guarantee that 100% of this funding will be spent on SP services.

Concerns about the long-term impact if the SP ring-fence is removed

2.9 Although the above paragraphs focus on the legitimacy of the two-year budget deal, our major concerns are about the medium to long term impact of removing the ring-fence around Supporting People funding. If this goes ahead, we fear that the following could happen:

- It will become impossible to hold Ministers to account for the amount of funding allocated to homelessness and housing-related support services for vulnerable people.
- A reduction in spending on Supporting People services, particularly for more marginalised and less ‘politically popular’ groups such as homeless people, people with mental health problems and people with substance misuse problems.
- A dilution in the focus on homelessness prevention and housing if SP is merged with non-housing programmes.
- A gradual loss of expertise in housing-related support both at a commissioning and practitioner level.
- A gradual reduction in specialist service focus and funding.

Evidence of the impact of removing the SP ring-fence in England.

2.10 There is clear evidence that removing the ring-fence in England has had disastrous consequences on homelessness prevention and service provision. A report from the National Audit Office in 2014, *The impact of funding reductions on local authorities 2*, draws attention to average spending reductions in England of 45.3% between 2010/11 and 2014/15

“most spending reductions in housing services have come from planned reductions in the Supporting People programme. [...] During this period, spending on this area will fall by a median of 45.3%, across single tier and county councils.”

2.11 In December 2010, Inside Housing reported that:

*“Nottinghamshire Council is consulting on axing 67 per cent from its Supporting People budget, from £22.5 million in 2010/11 to £7.5 million next year. Rochdale and Cornwall councils are planning cuts of 30 and 40 per cent respectively”.*³

2.12 In February 2013, Inside Housing reported that Derby Council had confirmed that they had agreed the biggest cut ever made by a local authority to a Supporting People budget:

*“The council intend to reduce this year's planned budget of £9.3 million this financial year to £6.6 million, and then reduce the Supporting People budget to £3.8 million in 2013/14 and to £1.8 million in 2014/15. This equates to an 81% cut over three years.”*⁴

2.13 The Homeless Link report, *Support for Single Homeless People in England (2014)*⁵ makes this point clearly:

*“In 2009, the ring-fence was removed from the Supporting People budget, and in 2011–12 it was rolled into the Formula Grant given to local authorities. It is now a wholly decentralised programme, ‘housing-related support’, and there have been substantial reductions in some local authorities as the funding is prioritised for other services. In some areas, funding for homelessness services has been cut by as much as 80%.”*⁵

2.14 The Homeless Link *Survey of Needs and Provision 2013*⁶ references a reduction in targeted services for:

- Rough sleepers, reduced from 28% to 7%
- People with mental health problems, reduced from 22% to 4%
- Prisoner leavers, reduced from 16% to 1%.

2.15 Just as concerning is their noting that *“several groups that had previously had targeted services now have none, including sex workers, refugees, irregular migrants and disabled people”.*

2.16 The report summarises this trend: *“This is the continuation of a trend that was seen in last year’s SNAP. It seems likely that this reduction in targeted services is connected to reduce funding leading to reduced staffing levels, with less staff*

available for specialist groups. Overall, there is a sense that projects are scaling back provision to provide a more basic and generic service to clients.”

2.17 These are echoed in the Homeless Link report *Who is Supporting People Now?* which identified key risks in 2013, which were ultimately borne out across England:

- As local authorities restructure, housing-related support teams are losing experienced staff, which puts at risk crucial relationships with service providers and understanding of the needs of clients
- Incremental funding reductions will push providers beyond the point of financial viability
- Service quality declines and authorities have no oversight of provider performance because effective monitoring is not carried out.
- The hourly rate for support work is pushed down so far that good staff leave and experience and judgement is lost, leading to poor quality and safeguarding issues.
- Local authorities do not involve providers early in decision-making, so that providers have to find financial savings quickly and with little notice.
- The value of homelessness services is not recognised by government, particularly HM Treasury, so that in future budget support to homeless people is cut even further.

2.18 The report goes on to identify particular problems in access to floating support, a patchy spread of services across rural areas and a significant reduction in skilled staff.

2.19 The key points of learning to take from England’s experience is that the initial removal of ring-fencing leads to significant and sustained reduction in funding for support, and a gradual loss of focused specialist support. This is then followed by a move from a larger grant, to the overall revenue grant, which then led to the cliff-edge reduction in support. The further point of vital importance to the National Assembly for Wales is the lack of accountability and monitoring by HM Treasury in England (and in our case, accountability through the National Assembly’s scrutiny of the Welsh Government’s budget).

2.20 The *Northern Ireland Supporting People Review*⁸ raises the additional risk with the developments of Supporting People funding in England, noting that

*“The picture of SP in England today seems to be that fewer and fewer local authorities are maintaining a separate SP budget or team (many SP teams have been amalgamated with social care or mainstream council service teams). The key driver for this appears to stem from overarching cuts to LA budgets which are prompting local authorities to prioritise statutory services, often to the detriment of SP services.”*⁶

2.21 It is a decision that is bitterly regretted by local authority commissioners in homelessness teams across England. We have heard from several people who worked in English local authorities at the time and can scarcely believe that the Welsh Government is considering the same:

“The removal of the SP ringfence in England was the biggest contributor to the rise since 2010 in single homeless across most parts of the county (in my opinion). [...] where I was working at the time it allowed the County Council to decimate services.

“The only reason to remove a ringfence is to allow a cut [...] Bizarre they think they can make a decision which went so badly in England and which everyone can point to.”

The view from the sector: Support providers, RSLs and local authority SP leads

2.22 While we recognise the WLGA’s position that they would like there to be no ring-fence or conditions attached to any aspect of their funding, the views of some people working within local authority Supporting People teams are very different. SP leads in Wales have approached Cymorth Cymru to raise concerns about the Welsh Government’s plans to remove the ring-fence and merge SP with non-housing programmes. They have described the decision to remove the ring-fence as *“disastrous”, “short-sighted”, “incredibly risky”* and have expressed very real fears that the proposed merger of grants will leave vulnerable people without support.

2.23 In his evidence to the Public Accounts Committee on the 27th November, Nigel Stannard (Supporting People Programme Manager, Newport City Council) echoed this view, referencing the consequences in England: *“You just have a look across the border at England to see what happened to the Supporting People programme over there when the ring fence was taken off—it was just lumped into*

the LAA. Supporting People has been decimated, refuges are closing, et cetera. So, I think ring-fencing and hypothecating the grant is essential.”

2.24 The membership of Cymorth Cymru (third sector support providers, registered social landlords and local authority SP teams) is united in the view that the ring-fence around SP should be retained and that merging SP with other non-housing grants carries huge risks for vulnerable people. Cymorth and our members are not opposed to change – a limited amount of flexibility such as the 5% trialled over recent years was accepted as it did not expose the programme to the same level of risk as the current proposals. We have also offered an alternative solution, which we have discussed with our members. This is the alignment of SP with the Homelessness Prevention Grant and the funding for supported accommodation that will be devolved to the Welsh Government in 2019/20. It is based on the principles of grant alignment, but retains SP firmly in housing and homelessness.

2.25 Our membership is open to new ideas and ways of delivering services, but when confronted by the grim reality of the evidence in England they cannot support the removal of the ring-fence or merger with non-housing grants. Any decision to remove the SP ring-fence and merge with non-housing programmes will have been made with a lack of evidence, foresight and consideration of impact. The Pathfinder projects will have been in operation for a handful of months before Ministers make a decision about merging the grants in 2019/20. This is nowhere near enough time to assess the medium to long term impact of removing the ring-fence.

2.26 This is a very real test for Welsh devolution and questions whether the government is committed to evidence-based policy making. It is rare that politicians have the ability to see the negative impact of a policy decision just over the border and we are extremely concerned that the Welsh Government may not heed the warning from experts in Wales and people who have seen the ring-fence removed in England. It is unacceptable that the counter argument to these evidence-based concerns is simply that it will not happen “because this is Wales”, or because particular Ministers or local authorities are committed to reducing homelessness.

3. The impact of wider policy developments on the programme

The overall clarity of the Programme's objectives

3.1 We believe that the Programme's objectives, as laid out in the draft guidance that was consulted on during 2017, are clear and appropriate. In particular we welcome the first two objectives being focused on homelessness prevention and support to help people live independently. Although the Programme delivers a variety of services to a diverse range of client groups and provides benefits to a range of public services, Supporting People is rooted in housing and homelessness prevention and this should be clear from the outset.

3.2 Although our members feel that the Programme's objectives are clear and appropriate, some commented on the ever-changing and sometimes competing political priorities from different Ministers that can cause confusion for providers and commissioners:

"The overall clarity of the programme is fine as set out in the guidance document. However, confusion is often caused by competing political objectives. I.e at times the programme is positioned as part of the homelessness strategy, at times as part of the anti poverty programmes, also as the answer to public health issues and ACE's etc etc. This 'S.P' as the answer to everything approach from policy makers does not assist the programmes clarity and leads to confusion on the part of commissioners about what service they are purchasing."

The implications of, and emerging response to, the UK Government's Supported Accommodation review

3.3 The UK Government's Supported Accommodation Review has huge implications for the Supporting People Programme and vice versa. The majority of short term, transitional supported accommodation is funded by two elements: rent and eligible service charges (currently paid to individuals via housing benefit) and the support element (paid to support providers via Supporting People). The majority of short term, transitional supported accommodation schemes for vulnerable young people, care leavers and people experiencing homelessness, domestic abuse and mental health problems are dependent on both of these funding streams.

3.4 After two years of huge uncertainty, the UK Government has decided to take the funding for rent and eligible service charges in short term supported accommodation out of the welfare system and devolve it to the Welsh Government

in 2019/20. The Welsh Government is currently working with the sector to develop advice for Ministers about the best model to distribute this funding.

3.5 However, in parallel to the sector getting some clarity and certainty from the UK Government about funding for rent and eligible service charges, the Welsh Government has introduced huge uncertainty by considering merging SP with non-housing funding streams. In our view, it is absolutely critical to the future of supported accommodation that Supporting People funding remains distinct and protected while the Welsh Government develops a new funding mechanism for the rent element of supported accommodation.

How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments

3.6 One of the criticisms of the Welsh Government is that it has expected Supporting People to contribute to a vast array of Ministerial priorities, policies and pieces of legislation. The Programme is well placed to do this, as its values and holistic approach to homelessness prevention are closely aligned with many policy areas, including improving mental health and wellbeing, preventing domestic abuse, and reducing Adverse Childhood Experiences. However, as outlined above, this has sometimes confused providers who feel like they are being asked to deliver too many priorities during a time of constrained resources. There have been calls for the focus to be (re)sharpened, and for this to be rooted in the Programme's origins of homelessness and housing related support – while recognising that many of the other issues highlighted above are key to preventing homelessness and supporting housing stability.

3.7 This would be in line with the Housing Directorate's stance over the past few years, which has emphasised the importance of Supporting People being aligned with the Housing (Wales) Act and homelessness prevention. However, this has recently been blurred by the possibility of merging SP with non-housing programmes, which has created yet more confusion about the government's priorities. The antidote to this confusion is retaining the ring-fence and keeping SP as a distinct funding stream focused on homelessness and housing – not merging it with programmes that have no direct relation to housing.

How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements

3.8 Many of our members would like to see greater coordination and information sharing between the regional bodies. Some respondents suggested some joint meetings between RCCs and RPBs in order to have collective discussions about the solutions facing the region. However, there was also a note of caution about losing the focus on homelessness and housing-related support if RCCs were subsumed into other regional bodies.

“For S.P. to be better understood, then greater alignment with these other boards for the RCC's would be of help. They should not however be subsumed into them where the voice of S.P. professionals would be lost in the wider concerns these bodies are set up to address.”

3.9 Retaining housing and homelessness expertise in the regional planning and commissioning of Supporting People services is absolutely essential, especially when homelessness is becoming an increasing challenge throughout the UK. Although RCCs vary in effectiveness, it is recognised that the housing expertise within their membership is a key strength.

3.10 Links with Public Service Boards: We would value stronger links between Regional Collaborative Committees and Public Service Boards (PSBs) and would also welcome an increased focus on housing by PSBs. However, PSBs have very broad ranging responsibilities and we therefore believe that the planning and commissioning of SP services must remain firmly rooted in bodies/structures dedicated to housing and homelessness. Another challenge is that the Public Service Boards are currently set up along local authority boundaries – this seems entirely out of step with the Welsh Government’s regional agenda. If PSBs were regional, there could be a stronger link between RCCs and PSBs; RCCs could even report to PSBs in the future.

The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years

3.11 We recognise that some Regional Collaborative Committees (RCCs) operate more effectively than others. Some of the regions that function well across local authority boundaries have a history of working together that pre-date the RCCs, which then provided a good platform for effective regional working in the context

of housing-related support. This has led to regions working together on needs assessments, service user involvement and commissioning. Other local authorities have had strained relationships historically, which makes collaboration in any policy area more difficult.

3.12 However, we believe that the existing structure is of value and should be strengthened. With the UK Government proposals to devolve housing benefit funding for supported accommodation this may be the appropriate time to consider strengthening the powers and responsibility of RCCs to plan and commission the support and rent elements of Supporting People services on a regional basis. Strengthening the powers and responsibilities of RCCs may also help them to become more effective in their efforts to facilitate regional planning and commissioning.

3.13 One issue raised by members is that RCCs do not have any statutory funding or legal powers, which means that they can do little to progress the regional agenda if individual local authorities do not wish to collaborate. *“The weakness of some RCC's is that they carry no legal weight – operating as at best advisory scrutiny committees. This has allowed a few L.A's to simply ignore the views of other members. This is a structural problem and goes back to the decisions made at the time of establishing the RCC's and needs to be revisited if they are to perform more effectively.”*

3.14 Some of our members have suggested that funding drives behaviour and that regional funding and commissioning would drive better regional working. *“service models are often influenced by funding; regional approaches to funding can drive greater region models and delivery.”*

3.15 Another issue is that some of the agencies that people see as being key to effective partnership working are not at the table: *“talking and working together is better but there is more to do and some of the key agencies/providers are not at the table.”*

The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Wellbeing of Future Generations Act 2015.

3.16 Long-term: SP services provide both short term support for people experiencing a housing crisis or in need of a small amount of support, as well as

longer term support that helps people to (re)gain the skills to live independently well into the future. However, as highlighted elsewhere in this document, funding pressures and uncertainty can compromise the length and quality of support. Without longer term funding and clear assurances about the continuation of the ring-fence, it will become increasingly difficult to balance long-term and short-term needs.

3.17 Integration: The holistic nature of the SP Programme and the diverse experiences of support needs of people using SP means that services integrate well with other with a wide variety of areas, working with partners in social care, criminal justice, health, housing and more, to meet the needs of individuals and contribute towards Wales' wellbeing goals.

3.18 Involvement: Providers of SP services involve people who use services in a variety of ways, in the development and evaluation of services and in the appointment of staff. Some SP regions have also embarked on specific service user projects, such as the Gwent service user website. People who use services are also asked about their views and experiences in a series of annual events across Wales which result in a report to the Supporting People National Advisory Board.

3.19 Collaboration: There are some very positive examples of collaboration between the SP sector and other partners such as health and social services. These examples have brought together funding, properties and the provision of care and support to benefit people with mental health problems, people with learning disabilities and young people who have had adverse childhood experiences.

3.20 Prevention: The main aim of the Programme is to prevent homelessness and support people to live independently in their homes and communities. However, SP services also prevent domestic abuse, mental health crises, hospitalisation, (re)offending and the need for social care services.

4. Monitoring and evaluation

4.1 Financial pressures have inevitably increased calls for evidence of impact across a variety of Welsh Government programmes. Although Supporting People has been criticised for a lack of evidence, it probably has more than other funding streams and continues to lay the foundations for improved data collection.

4.2 The outcomes framework may be far from perfect, and we agree that it needs to be improved in order to give more credibility to its data. However, outcome data submissions have steadily increased across the majority of categories over time, in line with the Supporting People grant terms and conditions. The outcome data from 2015/16 shows positive outcomes for the majority of relevant service users in the areas of 'Feeling Safe and Managing Money', 'Managing Accommodation', 'Physically Healthy, Mentally Health and Leading an Active and Healthy Lifestyle', 'Contributing to the Safety and Well-being of Themselves and Others, Managing Relationships and Feeling Part of the Community' and 'Engaging in Educational Learning and Engaging in Employment/Voluntary Work'. Additional data has recently been collected for the homelessness status of people using Supporting People services, which shows substantial reductions in the proportions of people who were homeless or at threat of homelessness following support.

4.3 The SAIL data linkage project has provided some very robust and interesting data about the impact of Supporting People interventions on the use of health services in Wales. This project links anonymised data from Supporting People services with data about the use of health services. The feasibility study in 2015⁹ established that it was possible to link data in two pilot local authorities and indicated that interaction with Supporting People services resulted in a reduction in the use of GP services, A&E and emergency hospital admissions. A larger scale four year research project was subsequently funded and is currently gathering and analysing data on a much greater scale from every local authority in Wales. It makes little sense that the Welsh Government is considering removing the ring-fence just two years into this evaluation of the Programme's impact. In addition, merging SP with other programmes may make it harder to track impact and continue the research.

4.4 The long-standing review of impact often referred to is the 2006 Matrix Research report for the Welsh Assembly Government¹⁰, which identified £1.68 of savings from other public services for every £1 spent on Supporting People

services. This included savings to health, independent living, social care, homelessness and criminal justice.

4.5 In addition, a 2011 report by Carmarthenshire Supporting People team¹¹ identified that every £1 spent on SP services delivered £2.30 of savings to housing, health, social care and community safety. A more recent report by The Wallich, *Support that Saves*¹², estimated that every £1 spent delivers £2.99 in savings to the public purse.

4.6 The Gwent Regional Collaborative Committee produced *Supporting People: Improving Lives, Preventing Costs*¹³ which used a series of case studies and a cost-benefit analysis tool from New Economy Manchester¹⁴ to hypothecate savings made as a result of individual-level interventions. Whilst admittedly based on the prevention of interactions *not made* with services, these demonstrate the very real positive impact on prevention by the Supporting People Programme.

4.7 Two additional reports by Cymorth Cymru this year have also added additional evidence to the impact of Supporting People. In January 2017, we held a series of engagement events with people who have used Supporting People services. Our report of these events¹⁵ demonstrates the massive personal impact this programme has on individuals, with many attendees saying they would be dead, in an institution, on the streets or seriously ill without Supporting People services.

4.8 Our Health Matters report¹⁶, makes even clearer the links between homelessness services and health outcomes. To weaken a key foundation of homelessness prevention services by removing certainty within the SP programme whilst the health service is under such pressure is a short-sighted decision that will have significant ramifications on the wider public and their access to A&E, and other health services.

4.9 Evidence from other parts of the UK also highlights the savings delivered by Supporting People services. The reports commissioned by the UK Government Department for Communities and Local Government estimated that there were net financial benefits of £1.79 (2006) and £2.12 (2009) for every £1 spent on SP services. In Northern Ireland, analysis in *The Financial Benefits of the Supporting People Programme in Northern Ireland*¹⁷ (Sitra / Centre for Economic Empowerment) shows that every £1 spent on SP services saves the public purse £1.90.

How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring

4.10 The use of monitoring and outcome data differs across local authorities and there are varied degrees of scrutiny. Some of our members report that local authorities use it for contract monitoring and service reviews. Some said that it wasn't clear how outcome data is used in commissioning and others said that it wasn't used to inform decision making.

4.11 However, providers are keen to emphasise that they provide a lot of information for commissioners, with some commenting that it is excessive and can detract from good service delivery.

"There is a whole host of contract compliance information that is submitted annually, quarterly and monthly. On-site verification visits have recently been introduced with one local authority as part of their contract monitoring, reviewing support plans to ensure that they evidence the outcomes reported and staff hours linked to projects."

4.12 Some commented that the outcomes data is unreliable and should therefore be treated with caution. Others commented that it gives some good guidance about the effectiveness of a service. Others questioned the value of quantitative data without qualitative data that shows the difference a service makes to someone's life.

4.13 One respondent commented that the recent emphasis on saving money and shortening support periods can prevent providers from meeting intended outcomes.

"The current extent to which outcomes data is used to determine the programme expenditure and contract monitoring is unclear. measures of outcome achievement do form part of contract monitoring , but are widely perceived to be of limited value. The emphasis on saving money and having the shortest possible length of intervention in any event mitigates against the ability of providers to assist service users in meeting outcomes." 12

The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework

4.14 The revised outcomes framework was met with varying degrees of support during the consultation period, with some aspects being welcomed and others being met with scepticism. However, all providers want an outcomes framework that demonstrates the impact that they make on people's lives. They understand the value of evidencing impact, particularly during a time of constrained budgets and they know that their services make a real difference to people and public services. Further engagement with the sector would help to refine the proposals and deliver a framework that works for providers and for government.

How any revised outcomes framework arrangements can be best communicated and embedded

4.15 We asked our members how a new outcomes framework should be communicated and embedded. Suggestions included:

- Resources are made available for implementation
- A revised, robust database and IT programme
- Multi agency training for managers and frontline staff that ensures consistency across Wales
- Clear, user friendly guidance including examples of scenarios to inform decision making
- Keep processes to a minimum to ensure it is not an onerous task – especially for smaller providers
- Trial period for each client group – before rolling out to all providers
- Opportunities to share and embed good practice and learning

Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services

4.16 Some of our members commented that it would be beneficial to have a uniform, standardised approach to monitoring and evaluation across local authority areas. The differences in approach across Wales can be frustrating for providers and landlords who operate across different local authority boundaries.

4.17 Several providers highlighted the importance of the voice of people using services and the involvement in documenting outcomes and whether a service has

provided value for money. Some highlighted the value of case studies to supplement the quantitative evidence provided through monitoring number of units and the outcomes data.

4.18 Others reflected the difficulty in comparing VFM across different services.

“I think it would be better to benchmark and compare VFM but it’s difficult as the service provision and method of delivery is very diverse.”

“I do have concerns about SP funded services 'competing' against one another; the outcomes for learning disability supported living which receives SP may look very different to that of other services – long term vs. short term outcomes.”

“Need to understand reasons for variation in cost i.e. new build spends less in maintenance etc.” 13

5. The distribution of Programme funding and financial planning

The issues that need to be considered in developing and implementing any new funding formula

5.1 We believe that funding should be distributed to areas of greatest need, and that this should be based on robust needs assessment rather than historical spend. It should also ensure that client groups which are less ‘politically popular’ receive the support services they need. Our members have urged the Welsh Government to consider the needs of urban areas and rural areas; the transport infrastructure and challenges of rural areas and the increases in homelessness in urban areas. Appropriate transition periods will also be essential in order to minimise disruption to vulnerable people’s lives.

5.2 We understand and appreciate the Welsh Government’s decision to pause redistribution during a period of cuts, as this would have led to some areas facing a ‘double whammy’ of cuts. However, it can also be argued that the delay in redistribution means that other areas continue to face funding shortages that impact on their ability to meet vulnerable people’s needs. Any change to the funding formula must be done in collaboration with the sector and should be mindful of any unintended consequences such as the sudden removal of services for particular client groups. At a time when welfare reform and a lack of housing is

resulting in increased homelessness, it would be preferable for redistribution to take place within the context of increased SP funding. This would enable more preventative service to be funded without decreasing existing provision.

5.3 However, two major issues have arisen since the Wales Audit Office report was published, which have a direct impact on any decision to develop and implement a new formula. Firstly, the possibility of a merged grant on 2019/20 raises questions about whether a formula for SP will be necessary.

5.4 Secondly, even if the Welsh Government does not merge SP with other grants, the UK Government's plans to devolve funding for rent and eligible service charges in short term supported accommodation creates additional considerations. The Welsh Government is currently tasked with developing a new model for the distribution of this funding, the majority of which is likely to relate to SP-funded provision. Our members from providers, landlords and local authorities have all urged the Welsh Government to utilise existing mechanisms and structures in the development of this model. As the majority of short term supported accommodation will rely on funding for both rent (to be devolved) and support costs (funded through SP), it will be essential for these elements to be commissioned and funded alongside each other. It may well, therefore, be sensible to incorporate the work to develop a new formula with the work to develop a funding mechanism for the devolved rent costs in 2019/20.

How budget pressures and funding uncertainty have affected service planning and delivery

5.5 Budget pressures and funding uncertainty has had a significant impact on providers, landlords and local authority teams. Although the Supporting People budget has been protected in cash terms for the past two years, this represents a real terms cut to local authorities. Annual funding allocations also create huge uncertainty for a sector that is responsible for providing support to 60,000 of the most vulnerable people in Wales. This means that local authorities feel under pressure to make savings and find it difficult to give providers and landlords assurances about longer term contracts. Each year, local authority teams, support providers and landlords wait to hear whether they will receive the funding they need to continue running these services.

5.6 This can hinder long term, strategic planning for all stakeholders at a time when welfare reform, homelessness and increasingly complex needs pose

significant challenges to the most vulnerable people in Wales. Our members have told us that the annual uncertainty over budgets and likelihood of cuts has greatly impacted on service planning and delivery. Landlords and providers have told us that they have been unable to renovate older services as they have no guarantee of future funding.

“This has come from several angles – firstly we have services funded annually and we have to wait usually right to the end of the financial year before we know if we have another years funding – this prevents planning, affects service users and also leaves staff at risk of losing there jobs. Secondly we are constantly having to be creative about delivering more services for the same or less which don't take into account staff costs, living wage changes etc, overheads etc and then more recently huge uncertainty re UK Govt welfare reforms ie LHA/UC which do impact on these services – this prevents meaningful dialogue about changing services and indeed planning for new innovative service delivery models due to the uncertainty.”

5.7 Impact on smaller or specialist providers: Funding pressures and uncertainty can have a greater impact on smaller providers, which may have fewer resources to rely on when funding is cut. The move to fewer, larger contracts as a cost saving exercise also impacts on smaller providers, who do not have the capacity or resources to bid for large contracts. While commissioners do not have a responsibility to ensure the survival of any particular organisation, it is important that they do not create an environment that results in no diversity of provision, no choice for people using services and no specialist services for those who need them.

5.8 Crisis resolution: Our members have reported a reduction in the number of units of support which has led to support being focused on people with the greatest and/or more complex needs. This means that people with a lower level of need may no longer receive a service that could have prevented a crisis from developing. There have also been examples of support being restricted to several weeks. While this may be appropriate for some people, others need support over a longer period for it to have a lasting, positive impact and prevent people from needing support again.

“Reduced number of units of support available. [...] This in turn means those who are in receipt of SP are those with higher needs. This combined with the instruction to reduce the time available to work with service users for a year (ish) to twelve

weeks means that support workers are at best fire fighting , and unable to deliver a comprehensive service.”

“Additionally, this approach of 'greatest need' ignores the reality that it is often those who are just slipping into difficulties who are the ones with whom the most impact can be achieved. Preventing them going on to become those with high or complex needs.”

“This has other effects in supported accommodation. The need to reduce numbers has led to the the exclusion by the LA of many who would have previously accessed the service. Resulting in shared housing projects having only very vulnerable residents rather than a balanced population and again reducing the staff to fire fighting rather than positive work to assist service users.”

5.9 Impact on staff: The uncertainty associated with annual budgets also has a negative impact on the wellbeing of frontline staff and on retention. This can result in skilled and committed support workers, team leaders and senior managers leaving the sector for employment that gives them and their families more certainty. Our members have reported that staff are more stretched, with increased workloads.

“the uncertainty of the future causes staff morale to lower and can lead to a loss of staff creating more pressure during these times of uncertainty.”

“the efforts made over many years to skill up support workers and to provide them with decent salaries and conditions have been seriously undermined by the situation of competitive tendering forcing providers to cut all costs of the service they provide in order to stay in business.”¹⁵

5.10 Impact on people using services: Additionally, this uncertainty can impact directly on the people using services, as it increases the likelihood of changes to the service and their support workers. This was reflected by people at our service user engagement events in January 2017, who spoke of concerns about funding cuts and losing staff members with whom they had built trusting relationships. Given that stability can be vital to a person’s recovery, the increased certainty offered by three year indicative funding and spend plans could also be beneficial to the people these services support.

5.11 Another consequence of funding cuts is that some providers have taken the decision not to bid for contracts that they view as being too low value for the

services that need to be delivered. The primary concern of these providers has been the safety and quality of the services they deliver for vulnerable people with complex needs.

5.12 While we appreciate that the Welsh block grant is dependent on UK Government allocations, we believe Ministers could and should give longer term assurances to Programmes such as Supporting People. This would provide more certainty and stability, enabling longer term strategic planning by both commissioners and providers, which could deliver better outcomes for vulnerable people.

Reasons for the identified wide variation in financial support for different client groups across local authorities

5.13 Supporting People services vary considerably in order to meet the needs of a variety of client groups, which often include people with needs that vary in complexity and severity. A multi-faceted, flexible and responsive approach is one of the strengths, but this means that costs will vary within and across client groups. Fixed site supported accommodation will differ from floating support, and within each of these categories will be differences in the level of need and in the service delivery model.

“In simple terms, differing needs and differing types of service to meet those needs. The question is frequently asked why different services cost different amounts, the answer is in the detail and reflects the fact that they are different services. Two schemes for homeless young people may differ in cost– but one deals with more complex users and will have more input. Cheaper will not always reflect value for money.”

5.14 However, it is important to examine wide variations in cost where they exist to ensure that resources are being used appropriately. Commissioners, landlords and providers should be able to justify any legitimate differences in costs.

5.15 Local priorities, circumstances and historical provision may also determine how individual local authorities allocate spend. However, this should be shaped by evidence of population needs and gaps in provision through the work of the Regional Collaborative Committees, as well as data from population needs assessments conducted by Regional Partnership Boards and Public Service Boards.

Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support

5.16 Our members point to increasing demand and the budget pressures facing local authorities who are trying to provide services to more people at a lower cost. Re-commissioning provides local authorities with the opportunity to re-configure services and it is difficult to discount the higher cost of fixed site supported accommodation in contrast to floating support as being a factor in their decision making.

5.17 However, our members have warned against cutting fixed site supported accommodation for people who need more intensive support.

“As new services are developed, commissioners are aware that per person, the cost of shared or fixed schemes is much higher than for floating support. However, the move to the cheaper floating service will mean much of the support is lost. There is no comparison between the support that can be offered to a 16 yr old single mother in a residential mother and baby scheme and having a support worker ‘pop in’ once a week for an hour. you get what you pay for. A diluted service will cost less- but may well achieve less and so becomes money wasted.”

5.18 Others have highlighted that the provision of fixed site supported accommodation has been affected by uncertainties relating to funding such as the Welsh Government’s consideration of a merged grant and the UK Government’s fluctuating policy on rent and service charge costs. The lack of certainty about future funding means that supported housing may be seen as a significant investment risk – even when it is still very much needed. While the UK Government has now settled on a more palatable policy position, the Welsh Government’s consideration of a merged grant which removes the ring-fence around SP means has led to even more uncertainty about the future funding of fixed site supported accommodation.

The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns

5.19 There are some differing opinions on this, with some believing that spending is based on historical need and the extent to which some areas maximised housing benefit claims prior to devolution. Others believe that historical spend was reflective of need.

5.20 However, some of our members have commented that decisions about planning and spend are better informed due to better alignment with statutory homelessness systems, listening to the voices of people using services, looking at outcome and performance management data, and utilising population needs and gap analysis assessments.

1 <http://gov.wales/docs/caecd/publications/171001-budget-agreement-en.pdf>

2 <https://www.nao.org.uk/wp-content/uploads/2014/11/Impact-of-funding-reductions-on-local-authorities.pdf>

3 <https://www.insidehousing.co.uk/news/news/cash-strapped-councils-slash-sp-budgets-24370>

4 http://www.supportsolutions.co.uk/blog/funding/post/81_cut_to_supporting_people_funding_is_largest_ever.html

5 <http://www.homeless.org.uk/sites/default/files/site-attachments/Support%20for%20Single%20Homeless%20People.pdf>

6 http://www.homeless.org.uk/sites/default/files/site-attachments/SNAP2013_Full_Report.pdf

7 http://www.homeless.org.uk/sites/default/files/site-attachments/Who%20is%20supporting%20people%20now%20Report%20Jan13_0.pdf

8 <https://www.communities-ni.gov.uk/sites/default/files/publications/dsd/prl-sp-lessons-learned-final-draft-report-taking-account-of-qr2-comments.pdf>

9 <http://gov.wales/docs/caecd/research/2016/160310-supporting-people-data-linking-feasibility-study-final-summary-en.pdf>

10 Report available on request.

11 Report available on request.

12 https://thewallich.com/wp-content/uploads/2017/09/Support_that_Saves.pdf

13 <http://online.fliphtml5.com/ezex/utgz/#p=1>

14 <http://www.neweconomymanchester.com/our-work/research-evaluation-cost-benefit-analysis/cost-benefit-analysis-11>

15 http://www.cymorthcymru.org.uk/index.php/download_file/view/1152/161/

16 <http://www.cymorthcymru.org.uk/en/news-blog/news/health-matters-report>

17 <http://www.nicva.org/resource/financial-benefits-supporting-people-programme-northern-ireland>