

This evidence paper provides the Committee with an update on actions taken since the last evidence session in March 2019 to progress the Welsh Government's homelessness prevention agenda, particularly in respect of rough sleeping.

## **Context**

Whilst the focus of this committee is rough sleeping, it is important to recognise this is one aspect of a wider homelessness issue, albeit the most acute and visible form. In order to ensure a holistic, whole-system strategic approach, Welsh Government is keen to move away from segmenting different forms of homelessness and instead ensure we focus our policy and resources on tackling homelessness in its entirety.

As I set out in my letter to the Committee in June this year, our goal is to prevent homelessness and where it cannot be prevented ensure it is rare, brief and un-repeated.

As the Committee is aware, in 2009, the Welsh Government published a 10 year homelessness plan for Wales, which comes to an end this year. A focus of the 2009 plan was around embedding a preventative approach, which was delivered, in very large part, through the introduction and subsequent implementation of Part 2 of the Housing (Wales) Act 2014.

Implementation of Part 2 by local authorities across Wales has done much to prevent individuals and families from becoming homeless – over 23,000 households since 2015. However, whilst prevention rates remain high at 68% in 2018-19, we recognise there are still far too many whose homelessness is not prevented and who are falling through the net. It is also important to recognise that the demand on those presenting as at risk of homelessness is also increasing, with over 10,000 households presenting to local authorities in 2018-19, with an even larger number of over 11,000, owed a duty to secure accommodation as they were already homeless.

The Welsh Government has significantly increased funding since the introduction of the legislation to prevent and relieve homelessness. As well as additional funding through the Revenue Support Grant, we are providing over £20m this financial year alone specifically for homelessness prevention and relief, including rough sleeping.

We have been taking a fresh look at our approach since implementation of the Act and in light of evidence and wider policy and contextual changes. A significant amount of work has been undertaken and commenced since we met earlier this year, this work focusses on tackling all forms of homelessness, building on the good work that has accompanied implementation of the Act but recognising that we need to do more and do things differently if we are to achieve our ultimate goal of ending homelessness.

## **Strategic Approach**

In looking afresh at our strategic policy approach, Welsh Government has been informed by discussions at the Homelessness Ministerial Task and Finish Group, as well as cross-Government and Cabinet discussions. The Minister for Housing and Local Government will be making an oral statement to the National Assembly on 8<sup>th</sup>

October setting out our strategic policy approach to homelessness prevention and our overarching aim of making homelessness rare, brief and un-repeated. It will set out the whole system approach required across public services to tackle homelessness in all its forms; with prevention and rapid re-housing at its core. The Minister does not propose to publish a lengthy strategic plan but rather to set out clear strategic policy principles that will underpin all policy moving forward. This statement of strategic intent will then be supported by annual action plans against which progress can be more readily demonstrated and which can respond more readily to emerging evidence, best practice and changes to the wider context in which we work.

The Welsh Government shares the Committee's sense of urgency in achieving the aim of ending homelessness and as such we commissioned an expert action group in July this year to consider the actions we need to take as a nation to create a new policy landscape to achieve this goal.

As set out in the written statement to the Assembly in June 2019, the Action Group is a Welsh Government task group, which will report to Welsh Ministers, but is working independently to provide policy recommendations on the actions and solutions the group's expert members feel are required to address the following questions:

1. What framework of policies, approaches and plans are needed to end homelessness in Wales? (What does ending homelessness actually look like?)
2. What immediate actions can we take to reduce rough sleeping between now and the winter of 2019/20, and to end rough sleeping altogether?
3. How do we put the delivery of rapid and permanent rehousing at the heart of preventing, tackling and ending homelessness?
4. How can we ensure joined-up local partnerships and plans are put in place to prevent, tackle and end homelessness throughout Wales?

The Action Group is made up of experts from across the public and third sector and is chaired by Jon Sparkes, Chief Executive of Crisis. Precisely because of the sense of urgency we attach to this agenda, they have been tasked to work at considerable pace over a 9 month period, producing a number of reports during this time. The first report is due in early October 2019 and will focus on question 2; the short term actions required to tackle rough sleeping this winter. The Group may well recommend some short term measures which are intended simply as that, very short term and for which there would therefore be no intention to continue in the longer term.

The work of the Action Group is vital in informing the future policy approach and actions in respect of homelessness prevention. In terms of tackling rough sleeping this winter, one aspect of discussion in the group has been in relation to assertive outreach. As the Committee will be aware, Welsh Government previously commissioned Cymorth Cymru to develop a best practice guide on assertive outreach. In order to ensure alignment with the work of the Action Group, the assertive outreach guide has been shared with the Chair of the group for further

refinement, to ensure it complements the actions proposed by the group, before final publication in October 2019.

## **Rough Sleeping Action Plan**

Welsh Government previously stated our intention to revise the Rough Sleeping Action Plan to better reflect the focus of activity and also to provide clarity on timescales and ownership of actions. This will be achieved through the work of the Homelessness Action Group, whose first report, expected in early October, will focus very specifically on the short term measures needed to have immediate impact on rough sleeping. In the longer term Welsh Government wishes to move away from plans and approaches that 'segregate' homelessness by type, age or structural factors and focus on clear, evidence placed policies that deliver a single, whole system plan for ending homelessness.

Such a single strategic approach is also reflected in the new guidance for the Housing Support Grant, which we have been developing co-productively throughout this year with stakeholders across the sector. As I set out in the previous evidence paper in March 2019, the development of the Housing Support Grant provides an opportunity for greater alignment of Supporting People and Homelessness Prevention Grant and guidance to ensure the most effective use of resources and join-up of services. This work has been developing at pace during the year and in close collaboration with stakeholders, and we will be consulting on revised guidance for the Housing Support Grant in October 2019.

The new guidance will set out the requirement for a single strategic plan, encompassing both the statutory and non-statutory aspects of homelessness prevention. This will ensure a single strategic view is taken within a local authority area and ensure greater clarity and transparency on how funding is being used to deliver the local strategy.

In order to support the delivery of both the Housing Support Grant and the continued effective implementation of the spirit of Part 2 of the Housing (Wales) Act 2014, we have looked afresh at our approach to the Code of Guidance and supporting material and decided to undertake a far more ambitious and broader review and revision of the document.

The Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness was last updated in 2016. Since this, there have been a number of areas identified that could be strengthened within the Code of Guidance. The UK's withdrawal from the EU will also impact on the guidance provided within the Code of Guidance around eligibility of EU citizens in the allocation of housing.

This has provided an opportunity to:

- Review the intended purpose, audience and format of the document;
- Use an evidence based approach to inform best practice in its implementation;
- Engage with internal and external stakeholders to provide valuable input into the design of the new document;
- Strengthen the homelessness prevention policy intent;

- Improve consistency in its implementation across Wales;
- Provide a more accessible, user-friendly guide for front line staff.

The new Code of Guidance document will look a lot different to the current two-part document. Work is underway to re-develop the current Code of Guidance into a new, accessible, more policy driven document, set out in four parts:

Part 1 – Policy and direction

Part 2 – The statutory duty

Part 3 – Delivering a quality service

Part 4 – Measuring effectiveness

The new Code of Guidance will clearly set out, up front, the Welsh Government policy approach and the legal position. It will also provide practical guidance to support front line staff to deliver a quality service to individuals across Wales; supporting them to get the right support at the earliest opportunity. The new Code of Guidance will seek to bring together both statutory and non-statutory aspects of the agenda, based on a shared set of working principles and a collaborative, partnership driven, and more consistent approach.

Since the last evidence session in March 2019, officials have started work with stakeholders, gathering evidence into ‘what works’ and seeking views on what needs to change and what good practice looks like. A small external working group has been established and includes representation from Shelter Cymru, WLGA, the Local Authority Housing Networks, Cymorth Cymru, Tai Pawb and Community Housing Cymru.

As we are now undertaking a root branch revision of the Code of Guidance, the timetable for consultation has moved to March 2020 to enable this more substantial piece of work to be undertaken. This work is also encompassing a review of best practice, in order to ensure guides offer practical support to front line workers and are not simply a reiteration of the Code of Guidance. Guides on local connection and interim accommodation, which were due to be published in July this year, have therefore been held back to ensure they fit within this revised approach. In the interim, officials have written to each local authority to reiterate the expectations set out in the Code of Guidance in respect of these elements of the legislation, in support of the refresher training undertaken late last year.

The review of priority need commenced in June 2019 and is on schedule to provide Welsh Government with a final report early next year. As the letter to the Committee in June 2019 set out, Cardiff University were awarded the contract for the review following an open procurement process and their research has included engagement with a range of stakeholders across Wales. The report will provide an independent assessment of the implications of making changes to priority need. It is vital we fully understand the consequences, both intended and unintended, before determining whether changes are required.

In respect of data, Welsh Government has recently received a draft report examining the feasibility and use of individualised data on statutory homelessness, the final

report is due imminently. This report will help inform wider discussions on how to improve homelessness data, both statutory and non-statutory, to better inform both policy development and service delivery.

As part of this, we continue to support the Wallich's pilot of the Street Homelessness Information Network (SHIN), which is underway and will be evaluated later in the year. As previously set out, given the sensitive personal data involved, it is vital we get this right and put the correct legal and governance arrangements around this project if we want to ensure successful national roll out.

We are also continuing to work with the Centre for Homelessness Impact and their work to improve the evidence base on what works in regard to homelessness prevention.

## **Wider Developments**

Homelessness is a public services issue and we are working across Government to take forward actions to address its root causes. Fundamentally homelessness is caused by poverty or the lack of a stable and sufficient income. We do not necessarily hold the levers for change in relation to some of the economic factors that impact such as welfare reform. However, we do have the ability to focus our efforts and resources on addressing the shortage of affordable and suitable housing, ensuring people have access to the support they need and making our services person centred and relationship based. We are working to refocus on addressing homelessness at its roots; long term solutions that put households in the right homes with the right support to ensure they succeed. However, we know that cannot be at the detriment of supporting those who are in or near crisis right now.

On 9 July, the Welsh Government responded to the Independent Affordable Housing Supply Review report and accepted or accepted in principle every recommendation, with one exception in respect of the future of Help to Buy. The review's recommendations offer us an opportunity to reflect on the best aspects of our current policies and practices and those areas where changes can and should be made to ensure we get the best value for money from our investment in housing, and supports many more people in Wales to access the affordable housing they need.

We know there are ongoing challenges in delivering the number of homes required to meet current and future need, but we are taking significant steps here in Wales to deliver both market and affordable homes.. The provision of social housing is our top priority and we are committed to building at scale and pace. Social housing can provide not only quality homes, but the support needed to ensure people can sustain their tenancies and thrive.

The Private Rented Sector (PRS) is also an important factor in ensuring sufficient housing supply. Welsh Government is working closely with external stakeholders, to develop a scheme that will make properties in the PRS available, through Local Authorities, for those struggling to find affordable housing. The scheme aims to offer access to good quality PRS at affordable rents with the advantage of social landlord support for tenants., In the first instance we plan to launch a pathfinder very soon to provide a robust evidence for a national roll-out.

To address security of tenure in the private and social rented sectors, we have recently consulted on proposals to extend the minimum notice period to be given under section 173 of the Renting Homes (Wales) Act 2016 by amending that Act before it is implemented.

The consultation proposes tripling, from two months to six months, the notice that a landlord must give when seeking to end a standard occupation where there is no breach of contract. This would apply in those cases where a landlord does not have to provide a reason for ending the contract. The consultation also proposed restricting the issue of such a notice until six months after the occupation date of the contract. The Act currently sets this at 4 months.

Taken together, the effect of these two key proposals would be that contract holders would enjoy 12, instead of 6 months initial security of tenure so long as they do not breach the terms of their contract.

With over 10,000 households who present as at risk of homelessness and seek support under the Housing (Wales) Act 2014 citing the loss of rented accommodation as the main reason for doing so<sup>1</sup>, it is considered that this change will make an important contribution to homelessness prevention. This is because local authorities and their delivery patterns will have more time to assess and provide support that may be needed to find the individual alternative accommodation or to work with the landlord to see what can be done to save the tenancy.

These proposals were set out in an Oral Statement on 17 September and in a subsequent letter to all Assembly Members, setting out the merits of this approach and the benefits of implementing the Renting Homes Act before the end of the Assembly Term.

## **Cross Government**

More widely across Welsh Government, as part of the early intervention and prevention activity, we have been working closely with the social services directorate as we know a disproportionately high number of young people leaving the care system fall into homelessness. We have established a joint housing and social services group, which includes stakeholders from both sectors and is tasked with improving the pathway from care to independent living. It will identify what additional support and/or provision may be required in order to deliver the necessary improved pathways and housing choices for looked after children and young people leaving care.

Additional funding this year has enabled work through the Youth Support Grant, to support early intervention and preventative activities through education and youth services. This also links to the additional mental health and wellbeing youth work funding in the Youth Support Grant, and the additional funding which supports the whole school approach to well-being, all of which are aimed at supporting young people to lead healthy, prosperous lives and support the whole system approach to homelessness prevention.

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<sup>1</sup> <https://gov.wales/sites/default/files/statistics-and-research/2019-07/homelessness-april-2018-march-2019-993.pdf>

We also recognise the complex relationship between substance misuse, mental health and housing needs. To support our cross government approach to this we have agreed shared actions in the Substance Misuse Delivery Plan 2019 to 2022 and the Together for Mental Health Delivery Plan 2019 to 2022, both of which have been subject to public consultation during the summer. Both plans identify actions with housing as a priority and the need to support individuals with co-occurring and/or complex needs. In addition, specific funding has been made available in 2019-20 and 2020- 2021 to support this priority, in particular further developing support for Housing First and we are working across Welsh Government to further develop the final delivery plans.

As discussed at the last evidence session in March 2019, a key priority for the Welsh Government in tackling rough sleeping is ensuring effective transition from prison back into the community. We have a clear objective to ensure that nobody is released from the secure estate into homelessness. In a clear demonstration of the commitment of both Welsh Government and Her Majesty's Prison and Probation Service (HMPPS) in jointly taking forward this work, we now have a secondee from HMPPS embedded in the Homelessness Prevention Team. We have developed a jointly owned strategic framework and associated implementation plan, which sets out the collaborative strategic approach we are taking to prevent and address homelessness for all Welsh offenders.

A new board has been established that will oversee the programme, with ownership and delivery responsibility jointly shared by senior officials in Welsh Government and HMPPS. Key areas of work underway include taking forward the Glyndwr Report recommendations and initiating a process review of the existing pathway and work to overcome the barriers preventing its successful implementation. Work is also underway with key stakeholders to improve practices and resettlement outcomes for offenders on release at HMP Usk. We have provided additional funding for a Housing First project, led by Cardiff Council and involving a range of partners, targeting those leaving HMP Cardiff. This will provide for an individual from the Housing Option Team to be based within the prison, identifying and providing housing support to individuals prior to release. Our Housing First funding has also enabled a project in Rhondda Cynon Taf, which is targeting those leaving HMP Cardiff and HMP Eastwood Park, with an initial starting cohort identified.

### **Rapid re-housing - Housing First**

Whilst we are making significant strides in establishing Housing First across Wales we are clear that it can only be truly effective as part of a broader rapid re-housing approach. This requires a shift in policy and delivery, over time moving resource and focus from crisis interventions to earlier prevention and rapid rehousing. The Homelessness Action Group will be providing advice on how we might make this transition. Housing First is intended for individuals with the most complex needs and evidence demonstrates that it is vital not to rush implementation. Successful outcomes come from taking time to work with individuals and ensure the right support and choice of accommodation is available to meet their needs. Through our Housing First Programme, we are investing nearly £1.6m this year alone in projects that operate across Wales, which will help over 100 people with a history of rough sleeping to find and retain settled accommodation.

There are currently seven Local Authority areas covered by the programme (Anglesey, Cardiff, Conwy and Denbighshire, Merthyr Tydfil, Newport and Rhondda Cynon Taf) plus the bespoke project in operation in Cardiff for men leaving HMP Cardiff and women leaving HMP Eastwood Park.

As at 30 September 2019, 27 people are in accommodation, while a further 45 are being supported by projects with many awaiting matching to suitable accommodation.

In addition to these projects, Blaenau Gwent, Bridgend, Ceredigion, Flintshire, Gwynedd and Swansea local authorities are also delivering projects utilising a mix of their own funding and other Welsh Government housing funding. In all Housing First is being delivered within 13 local authorities across Wales.

As a result of the increased interest in Housing First, Cymorth Cymru established a Housing First Network in 2017, chaired by Crisis, to help contribute to the development of Housing First policy in Wales. The Chair of the Network sits on the Ministerial Homelessness Task and Finish Group, to ensure their work feeds into and is overseen by the Task and Finish Group, while both Crisis and Cymorth Cymru are represented on the Homelessness Action Group.

As there is no distinct off the shelf model of Housing First, there is a wide range of potential interpretations in service. In order to promote fidelity to the model, the Network, alongside the Welsh Government developed a ten point registration self-assessment checklist which forms part of the Welsh Government Housing First application process. The registration form includes the key principles and also contains a scoring template to assess a project's fidelity to the Housing First model. Building on the registration process and as a result of funding provided by the Welsh Government for the new Housing First co-ordinator role within Cymorth Cymru, a quality standard is being developed in order to assess a project's fidelity to the Welsh Housing First principles.

A specification has been drafted for an independent evaluation of Housing First in Wales. The evaluation will cover projects funded by Welsh Government, including the early housing-led projects, and those being developed independently. It will focus on ascertaining the improvements made in client's accommodation, health and wellbeing as well the impact in relation to demands on other services. The current timetable estimates that the project will commence early in 2020 and operate for the remainder of Welsh Government funding for the main programme.

As a result of the recent Welsh Government young people innovation fund, a further set of Housing First for Young People projects have also been funded to operate in Bridgend, Ceredigion, Flintshire, Merthyr, Powys, RCT and Swansea.

While a distinctly different model to Housing First, the Network has established a sub-group in order to support the development of the approach, while also ensuring the clear distinction is made between Housing First and Housing First for Young People.

All in all I am firmly of a view that we are facing up to the realities of homelessness in Wales, we are making significant strides and importantly we are thinking holistically and strategically about how we not only address rough sleeping but how we tackle homelessness in all its forms. I recognise the need to do things differently, there will be tough decisions to be made and brave new approaches to be embraced and I am delighted that the sector and those with lived experience are at the very front and centre of helping us reshape our policy and practice.