

Ending Homelessness WG High Level Action Plan - Consultation Response

Question 1

The Action Plan is split into four key areas of focus (Partnerships, Rare, Brief and Non-recurring). Do you agree that these are the right areas of focus / themes to focus the plan around?

[Yes, No, Partly]

Please explain why you consider the areas of focus / themes are right or if you think a different approach is needed?

These four areas align well with the recommendations set out in the Homelessness Action Group reports and are a useful way of thinking about prevention measures that are universal, targeted and those that are triggered by individual crisis points. We are also particularly pleased to see the section on partnership working, as we believe that this has been one of the positive things to come out of the sector's response to the pandemic and feel that it is vital that this is continued and expanded as we transition to new ways of working.

Partnership working will also be essential to avoid duplication and ensure resources are most effectively deployed in order to help people experiencing homelessness. It is worth noting that historically the commissioning system has encouraged service providers to compete for contracts rather than working together, so this will require a significant culture change. Whilst the first section of the action plan is laudable in its ambition to promote more partnership working, we would however like to see more detail within the high-level actions, with regards to how the commissioning process might be changed in order to promote collaboration over competition. We would like this strengthened within the HSG guidance for example, to ensure all local authority commissioners are working towards multi-agency services wherever this is appropriate.

Question 2

Do the actions in the Action Plan reflect the most effective high-level steps that will enable the Welsh Government and its partners to end homelessness in Wales?

*[Yes, No, **Partly**]*

How can they be improved?

We believe that the 15 high-level actions identified in the plan are broadly the right priorities, however we look forward to seeing further detail against each action, as we have many thoughts and ideas as to how they might be best approached. Our initial reactions are organised below against each of the 15 sub-headings.

The transition to rapid rehousing.

As services transition towards rapid rehousing, we believe there are important opportunities to learn from the experience of successful Housing First projects, who are well practiced in finding and matching suitable housing options for clients. A good example might be the local knowledge that these teams have of dynamics in the social and private rented sectors. Teams such as our Housing First Anglesey project have done years of relationship building with local landlords and understand the dynamics of housing in predominantly rural communities; RRH teams in other rural counties could learn from the challenges they have faced and overcome. Conversely, our HF project in Swansea has more experience working with large housing associations in more urban settings.

Supporting the continued emergency response.

Whilst the emergency response to homelessness during the pandemic has overall been a major success in terms of keeping people safe during a major public health crisis, it has of course created huge pressures on new and existing services which will need to be addressed in the short term. We agree that the focus on prevention is vital in order to make homelessness rare, brief, and unrepeatable in Wales, however before we can properly focus on prevention, we must address the immediate challenge of record numbers of households in temporary accommodation.

As at the end of August 2021 there were 6,817 individuals in temporary accommodation, and with new presentations outstripping the rate at which people can be successfully rehoused, this number is likely to continue to rise. With this in mind we need a detailed exit strategy to move away from temporary accommodation, even if it is the case that we need more of it in the short term. Above all, we cannot simply keep people in limbo whilst we wait for sufficient new houses to be built.

Legislative reform.

We have called for a review of factors such as priority need, intentionality, and local connection on many previous occasions, so we strongly support the government in looking to bring forward legislative reform in this area, and will be happy to respond to any proposals in a prospective green paper.

Increasing housing supply.

On the question of supply of suitable accommodation for rapid rehousing clients, we strongly support any measures the government can take to speed up the delivery of the 20,000 new social homes, as well as measures to increase availability of PRS tenancies.

One good example is the WG policy of offering the LHA rate to private landlords who wish to transfer their properties over to be managed by the local authority. Hopefully this might prevent landlords from removing their properties from the rental market if they do not want to take on full management of a tenancy. One additional option we would like to suggest is the option for landlords to transfer property management responsibilities to

a third sector organisation like The Wallich. Anecdotally we believe that there would be an appetite for this from landlords with whom we have good relationships, but who are daunted by the prospect of registration with Rent Smart Wales for example, and who might prefer to continue to work with us rather than the local authority. We would be prepared to take this on in order to make a tenancy possible, as we have experience of property management as well as providing support.

We also feel that more could be done to bring empty or under-occupied properties back into use for people leaving temporary accommodation. This might involve greater resources for local authority teams to identify suitable properties and problem-solve any issues that are preventing them becoming available for rent, as well as reform of planning rules to make it simpler to convert unused buildings into high-quality homes.

One of the other issues that we see repeatedly is that there is a real shortage of one bed properties available for rent, despite the significant demand from single person households presenting to local authorities. Part of the issue is due to affordability as a result of low housing allowance levels and the bedroom tax, but there is a real problem of supply as well. House builders and planners need to do more to ensure these one-bedroom homes are made available as soon as possible to keep up with this demand.

Recruitment and workforce development.

We feel that recruitment and retention of a highly skilled, motivated workforce in the housing support sector is one of the biggest challenges we face coming out of the pandemic.

The significant additional funding allocated to the HSG during the pandemic emergency response was hugely welcome to the sector, and we have seen that money has been put to great use transforming services to meet the real needs of people experiencing or at risk of homelessness. We were also delighted to see that this will be an ongoing commitment from the Welsh Government rather than a one-off uplift, but we would like to suggest that now this additional money is available, service commissioners should explicitly link this extra money to the requirement that all providers pay a real living wage to their staff. The Wallich is proud to be a real living wage employer, and we have sometimes found it difficult to match the specialist staffing requirements of a tender with the money available to resource it.

After the tremendous effort shown during the pandemic, housing support workers deserve fair wages as recognition of their work. This will not only boost morale after a difficult few years, but also aid with recruitment and retention of skilled staff, which is a significant challenge in some parts of the sector.

In addition, we would like to see a greater understanding from commissioners that in order to have an effective workforce providing support in psychologically informed environments, this will itself require ongoing investment. Staff need the time and space to engage in reflective practice, as well as supporting each other to manage vicarious

trauma. This is even more important in the case of staff with lived experience of homelessness and adverse life experiences: they can add huge value to support services, but only so long as they are not overworked and underpaid.

Homelessness Outcomes Framework.

A new national homelessness outcomes framework is something that was called for by the Homelessness Action Group, as well as by The Wallich in our 2021 manifesto, so it is good to see its inclusion here as a priority for the Welsh Government. We look forward to contributing to what we hope will be a wide-ranging collaborative exercise when determining what these outcomes should look like, as we have many ideas as to how this data could be used to become meaningful indicators of service performance, that can be scrutinised and compared between different projects over time.

In particular, we hope that the data underpinning these outcomes will be simpler and more consistent across all 22 local authorities, as well as reflecting the psychologically informed relationship-building work carried out between staff and clients. Data being collected should have a clear rationale, be reflective of 'softer' personal capabilities as well as 'hard' housing or health outcomes, and crucially, should not be retraumatising for clients to disclose.

Data collection.

As mentioned above, we strongly support the move towards national data collection standards, as all too often we have had to report to fragmented data regimes according to 22 different sets of local authority priorities and interpretations of HSG guidance, as well as having to use up to 22 different reporting processes. This makes it exceedingly difficult for us to collect simple, national datasets that can be compared through time, as well as being overly bureaucratic for support workers, for whom data entry should only be a small part of their job.

Strengthening housing support services.

As a major provider of housing support services across Wales, we are happy to engage with WG and all local authorities to ensure the provision of tenancy sustainment services aligns with the needs of local communities. Floating support services like these will likely form the cornerstone of the long-term prevention agenda, so we will be interested in learning and sharing good practices to ensure a sustainable future for this model.

Improving practice and provision of mental health services.

We would like to see much greater alignment between homelessness and mental health services, in recognition of the interconnected nature of both issues, and the fact that many clients will need specialist support with both. We need specific reassurance that dedicated mental health services for people experiencing homelessness will continue to be fully funded. For example, we are awaiting confirmation of whether or not current

Section 64 funding for mental health services will be extended or replaced. Without sustainable funding for these needs beyond housing, no level of HSG funding will be able to successfully end homelessness in all cases.

Improving practice and provision of substance misuse services.

We would also like to see much greater alignment between mental health and substance misuse services, through more consistent commissioning of 'dual diagnosis' services across Wales. There are several pilots trailing collaborative working to address complex needs, including one in North Wales that is working well, so this approach could be rolled out across Wales. Commissioned and funded properly, these services could be a great opportunity to embed harm-reduction practices across the sector.

One of the issues with a national outcomes framework featuring dual diagnosis services is that 'successes' for clients in these services can look quite different to 'successes' for clients with less complex needs, and too often these services are seen as 'failing' by commissioners due to unrealistic expectations. This needs to be reflected in the commissioning of these services and the inclusion of psychologically informed outcomes.

Early and targeted prevention measures.

One conceivable way to effectively strengthen early intervention might be to align homelessness prevention services with the Pupil Referral Units in local authorities; there is worryingly high levels of correlation between attendance at a PRU and later life experiences of homelessness, so this might be an opportune time to engage young people to teach important skills such as managing a tenancy.

Another major driver of homelessness in Wales is individuals leaving prison without stable accommodation to return to. This action plan talks about developing pathways for individuals accessing services and support, however we would argue that there are pathways in place currently, just that they are not working as effectively as they should be.

Whilst there are resettlement officers based in both the prisons and the local authorities, they are often under-resourced and are therefore unable to plan well ahead of release dates. Placements are often only finalised at the last minute, and there is a real risk of clients falling through the gaps, particularly if they have more complex needs as the pathways for housing, mental health and substance misuse services are currently not optimally aligned. If the partnership between local services and HMPPS is to be a success, it will require more attention and resources.

Review of family mediation provision.

We would support WG carrying out a review of family mediation provision, as in our experience there are significant variations in approach depending upon the local authority. There is definitely a place for family mediation services as part of the overall

response to homelessness, and we currently run a small number of projects which take this approach; however, we must remain sensitive to the fact that there are sometimes very good reasons why an individual might not be able to return to the family home, and that this will only be a viable option in some cases.

Communications programme.

The Wallich has long used its communications with the general public to try and reframe perceptions about homelessness. We believe that the language we use is extremely important and take every opportunity to push back against the idea that anyone should be defined by their experience of homelessness. The people we support are human beings, deserving of dignity and compassion, that is all too often lost in populist media narratives. All organisations in the sector should use their communication channels to work towards a more positive reframing of homelessness, and we should support each other in denouncing negative media which can be so damaging to the mental wellbeing of the people we support. We will support WG in their efforts to develop a communications plan and are happy to share examples of best practice.

Alignment with ACEs and tackling poverty policies.

Everybody working in homelessness support services needs to be aware of the impact of adverse childhood experiences (ACEs) and past trauma, as people with such experiences are disproportionately more likely to go on to experience homelessness. The Wallich has for some time been working to develop training and resources to ensure our staff are appropriately skilled to understand these complex issues, and we would be happy to be part of a national effort to promote greater understanding across the sector. Homelessness prevention policy can of course only be understood in the wider context of national policies to tackle poverty and deprivation more broadly.

Assertive outreach.

We recognise and support the ambition to move towards an assertive outreach model for rough sleeping services. We agree that it is not good enough to simply provide food and drink without also offering support with services, although we do note that such a simple gesture can be an effective first step towards building a trusting relationship, which is essential to helping people who are living street-based lifestyles. It would be good to see a detailed transition plan and guidance for all services across Wales, so we can understand what actions are appropriate to help build trusting relationships, and also understand the resources needed to devote sufficient time and attention to everyone who needs it.

The plan should also take into account the activities of local voluntary groups and religious organisations who often provide food and drink to people sleeping rough, but who may not have the skills or training to provide trauma informed support. WG and partners may need to look at what can be done to upskill and coordinate these voluntary

groups so that they align with the national plan for assertive outreach without duplicating, or worse undermining commissioned services.

One additional element that is not currently mentioned in the high-level actions is a response to street begging as one of the most visible aspects of street-based lifestyles. We believe that the old approaches of tackling begging through PSPOs and the criminal justice system do not solve the underlying issues, and call on Welsh Government to lead on more creative solutions, such as piloting begging licenses for example. There is a real evidence gap around effective measures to address begging, and The Wallich would like to work with Welsh Government and partners to learn what works.

Question 3

Does the Action Plan align with other relevant areas of policy and practice?

[Yes, No, Partly]

Please explain why it aligns well or outline how it could be made better?

The plan aligns well with The Wellbeing of Future Generations Act, as by building resilient homelessness prevention services, we will be able to create a future for Wales where homelessness is rare, brief, and unrepeatable. The plan with its emphasis on prevention and partnership working represents a good opportunity to further embed the five ways of working as set out by The Act, and will in particular contribute to the National Wellbeing Goals of a Wales that is more resilient, more equal, healthier, and comprising of cohesive communities.

Question 4

We have developed a number of key actions and milestones. Do you feel these are the right ones?

[Yes, No, Partly]

Question 5

Do you think there are any key areas for action not captured by the high-level actions? If so, what would they be?

As above, we are content with the 15 high level actions as identified, but we look forward to seeing more detail against each one, and more specific timeframes for delivery. At present we feel that many of the timescales are somewhat vague, and would prefer assigning some actual dates by which we can expect actions to be underway or completed. We would also like full transparency around how and when the third sector will be consulted with and clear and realistic timeframes for feedback.

Finally, we would like to see all local authority rapid rehousing transition plans published in a single central location, as sometimes in the past these types of plans have been

difficult to find on 22 different council websites, and have sometimes only been shared internally or on a 'need to know' basis. A single online location with all published local and national plans will greatly aid the transparency and accountability of this process.

Question 6

We would like to know your views on the effects that the Ending Homelessness Action Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

We do not believe that the Ending Homelessness Action Plan would have significant positive or negative effects on the Welsh language in and of itself. We would expect that the national Welsh Language Standards would be embedded into the service delivery specifications agreed between commissioners and service providers as they are currently. Particular attention should be paid to the Welsh language when establishing new partnership arrangements, to ensure everyone accessing support is able to do so in Welsh or in English. There is currently limited capacity of fluent Welsh speakers working in certain parts of the sector, so we welcome any support that can be provided by the Welsh Government or partners to upskill Welsh learners in the sector, as well as attracting current Welsh speakers to fill vacant roles.

Question 7

Please also explain how you believe the proposed plan could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Nothing further to add here.

Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

Nothing further to add at this time. We thank the Welsh Government for the opportunity to respond to this consultation, and we look forward to working together on many of these actions in the coming months and years.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: