



## **Post-pandemic interim homelessness measures**

Consultation Questions – <https://gov.wales/post-pandemic-interim-homelessness-measures-html>

**Question 1:** Do you agree with Welsh Government's 'no-one left out' policy?

Yes, The Wallich strongly supports the no-one left out approach to homelessness that was introduced during the pandemic. We believe that it has been a major success, thanks to the hard-work and collaboration of Welsh Government, local authorities and third-sector service providers. The policy likely saved many lives, as not only were many people experiencing homelessness brought into contact with support services for the first time, the numbers of people sleeping rough dramatically reduced, and thankfully very few outbreaks of coronavirus were reported amongst this community.

Of course, the success of the policy has created new challenges. Chiefly the high numbers of people spending time in temporary accommodation are longer than ideal, with too few opportunities for move-on into permanent homes. The latest official statistics show that as of March 2022 there were 7,779 people in temporary accommodation across Wales, and with the numbers of new presentations typically outstripping the number of successful move-ons, this number looks set to grow. Until we make progress clearing this backlog, it will be very difficult to successfully transition from temporary accommodation to rapid rehousing.

We look forward to reading local authorities' rapid rehousing transition plans when they are finalised later this year, but until then, the no-one left out policy must continue despite the challenges this creates for staff and service users. Increasing the supply of appropriate, affordable housing is ultimately the best way to ensure people can be moved out of temporary accommodation and into permanent homes as quickly as possible.

**Question 2:** Do you agree that adding a 'person sleeping rough' as the 11th category of Priority Need allows us to continue with the 'no-one left out' policy? If not, how else could this be achieved?

No, we do not agree that creating a new category under the Priority Need regime is appropriate, for the simple reason that we do not support a Priority Need system deciding who is eligible or ineligible for support. During the pandemic, the no-one left out policy meant that we effectively scrapped Priority

Need tests in favour of a public health approach, that everyone experiencing or at risk of homelessness is deserving of support.

The Welsh Government and partners across the sector have previously expressed support for ending Priority Need in Wales, but there have been differing opinions on how best to achieve this: whether to gradually add new categories until priority is effectively expanded to cover all homelessness presentations, or to follow a 'big bang' approach, doing away with the Priority Needs test altogether. Whilst we have sympathy with the first, incremental approach, on balance we feel that the 'big bang' approach would work given that this is how services have been operating for the past two years. It seems nonsensical to reintroduce Priority Need, only to effectively scrap it again in the near future.

We do agree with the general principle that people sleeping rough must be supported through trauma-informed, person-centred homelessness services, but would be concerned if services became overly proscriptive, for example demanding proof that an individual had slept rough for a specified number of nights in order to qualify for support. We have noted cases of local services hoping to support only 'verified rough sleepers', which risks missing the wider point; many individuals may live street-based lifestyles despite having an offer of a place to sleep at night, but for a variety of reasons may not be willing to stay there. Temporary accommodation can be chaotic environments which some clients may prefer to avoid. Nevertheless, anyone experiencing any form of homelessness deserves support.

**Question 3:** Do you agree with the definition of 'person sleeping rough' than we propose to use? If not, please provide a reason for your answer.

The proposed definition of 'person sleeping rough' appears to be in line with the definition previously used in the annual [National Rough Sleeper Count](#), which has worked well previously. Although we understand why the specific reference to sleeping or bedding down is made, it does seem something of an arbitrary distinction to make from someone on the streets who is not necessarily sleeping, particularly if the latter is then excluded from services.

We note that people in temporary accommodation (i.e. hostels or shelters) and sofa surfing are explicitly not included in this definition. However, later in the proposal, it is noted that guidance will be issued setting out the expectation that *those 'at risk' of rough sleeping are included in the new 11th category*. We would argue that individuals in temporary accommodation and sofa surfing are by definition at risk of rough sleeping, as those insecure arrangements can and do break down, leaving an individual with no choice but to sleep on the streets.

We reiterate that whilst a formal definition of rough sleeping is useful for data collection, it is only part of the picture when assessing street-based lifestyles, and as a result should not be used as deciding criteria as to whether or not someone is worthy of receiving housing support.

**Question 4:** Do you agree that pressures caused by Covid-19 should be added as a new exemption under Article 6 of the 2015 Suitability Order? If not, please provide a reason for your answer.

We agree with the Suitability Order that bed and breakfast (B&B) accommodation is not suitable, either for temporary or longer-term supported accommodation for people experiencing homelessness.

Although we concede that the use of B&B bedspaces during the pandemic allowed us to get many more people into accommodation, who might otherwise have been at risk of rough sleeping and at increased risk of catching and spreading coronavirus. Fundamentally however, we have been working hard over many years to move away from B&B type accommodation options, and this is not something we want to return to.

Whilst we don't have a particular view on how the legislation should be worded, we would strongly recommend that there should be no new placements into B&Bs, and that services should work hard to move on those individuals and families who have been in B&B since earlier in the pandemic. Such a moratorium would mean that B&B use will once again gradually be phased out. However, no one will be at risk of being evicted onto the streets at a hard deadline. One of the key issues with this type of accommodation is the lack of wrap-around support for mental health or substance misuse issues, so commissioners and providers may want to focus specific attention on those needs which may have gone unaddressed for too long.

Instead of any more placements into B&Bs, local authorities might wish to replicate successful projects such as [Ty Tom Jones in Swansea](#), a new partnership service established, as an emergency measure in less than 6 weeks, in May 2020 by The Wallich, Swansea Council, Goleudy and Pobl Group. This service provides fully supported accommodation alongside intensive rapid rehousing work, to help clients with any difficulties they might be facing, and crucially, get them into a new permanent home as quickly as possible. The project has seen some really positive outcomes since it was established, and we believe this model could also work elsewhere in Wales.

Whilst we work towards phasing out the use of B&Bs for homelessness presentations, we would like to see more rigorous inspections of these properties to ensure they are safe and meet acceptable standards. We are particularly concerned that nobody should experience declining health due to unsafe or unhygienic living conditions, whilst they wait for rehousing. We would like to see an impact assessment carried out of the numbers of people currently in B&B accommodation across each local authority, assessing the risks of long-term residences as well as the risks of eviction, and understand what mitigations are in place.

**Question 5:** Do you agree with time limit of 31 March 2023 to address the temporary accommodation pressures caused by Covid-19 exemption?

Whilst we understand that the emergency exemptions allowed during the pandemic cannot be opened if we are to make progress in our transition to rapid rehousing, we would not support a hard deadline if it falls before the current pressures on temporary accommodation are resolved. Whilst we would hope and expect numbers in TA to drop from the current peak of 7,779 before the end of March 2023, we are not prepared to risk mass evictions, should that not be possible, due to lack of appropriate move-on accommodation.

This is undoubtedly a tricky balance to maintain, as current pressures must not become an excuse to delay transition to rapid rehousing. But no one should be under any illusions that this will be an easy task, particularly given the ongoing pressure on support workers to continue their vital work with the 7,779 people currently in temporary accommodation.

**Question 6:** What impact do you foresee on resources (for example staffing)? Do you have evidence to support this?

The latest Welsh Government settlements for the Housing Support Grant (HSG) have seen extremely welcome uplifts to the budgets of local homelessness services. This has meant that we have been able to increase staff pay in line with the real living wage, as well as launch a number of new services across Wales. Nonetheless the number of new referrals and existing clients remains very high across the board. Maintaining staff morale is a challenge after two exhausting years working through the pandemic. As is the case in many sectors at the moment, recruitment and retention is difficult, and we are working hard to address staff burnout and build resilience across the workforce.

In order to provide the best services, funding from commissioners needs to be flexible; including capacity to increase funding levels as the number of referrals go up, in order to maintain safe and appropriate staff / client ratios. One obvious example where this is particularly important is in new rapid rehousing or floating support teams working to prevent homelessness from occurring. In order to meet the challenges of universal and targeted prevention, as outlined in the report of the Homelessness Action Group, services need appropriate staff and resources to meet current and future demands.

Local authorities are responsible for assessing levels of demand for services and it is important that they commission services based on local intelligence and evidence, rather than simply picking arbitrary numbers. Of course this is difficult, particularly when it comes to predicting future trends, but this is why it is vital to have effective ongoing monitoring of service delivery. Open communications between commissioners and providers are essential. Accurate data about local needs can then be returned to Welsh Government as the final decider of HSG budget allocations.