

Call for evidence: [Letter from the Chair to stakeholders in relation to homelessness Jan 22](#)

About The Wallich

The Wallich wants to create a Wales where people stand together to provide hope, support, and solutions to end homelessness.

As Wales's largest homelessness and rough sleeping charity, The Wallich operates under three core objectives: ***getting people off the streets; keeping people off the streets; and creating opportunities for people.***

Running over 70 diverse projects, across 18 local authorities, The Wallich works with more than 9,000 people experiencing homelessness every year across Wales.

Our response

We would like to thank the Local Government and Housing Committee for the invitation to share our views on the current situation of homelessness in Wales and to suggest specific issues on which the committee could focus their forthcoming work on homelessness and rough sleeping.

Our key recommendations are below with further comments in answer to each question posed by the committee.

Key recommendation

The committee may wish to consider the following issues, as part of its scrutiny of Welsh Government:

1. Welsh Government plans to manage demand for temporary accommodation in the short term, as part of the transition towards rapid rehousing.
2. The reliability of local statistics regarding the numbers of people presenting to local authorities, in temporary accommodation, and rough sleeping.
3. The extent to which psychologically informed environments (PIEs) and trauma are sufficiently understood and embedded in services across the housing sector and local government.
4. Key actions and milestones in the Ending Homelessness Action Plan, in particular how best to embed partnership working and integrate mental health and substance misuse services with homelessness provision (including funding for dedicated mental health services).
5. New approaches to addressing street begging, beyond PSPOs and criminalisation.
6. Embedding a human right to adequate housing in Welsh law.
7. Ending barriers to support such as priority need, the local connection and intentionality tests to ensure there is no wrong door when asking for help.
8. The recommendations made by the Public Services Ombudsman, and how standards can be maintained in the sector through accountable and evidence-led commissioning.

Further comments

Our views on the effectiveness of the “everyone in” approach put in place by the Welsh Government since the start of the pandemic and challenges maintaining that approach over the coming months.

We feel that the ‘everyone in’ approach put in place at the start of the pandemic was a real success, thanks entirely to the hard-work and can-do attitude of frontline workers across the sector, supported by local authorities and Welsh Government (WG) who went out of their way to enable (and crucially fund) whatever was necessary to respond to the emergency situation. **We believe that this approach has demonstrated emphatically what can be achieved when homelessness and rough sleeping in particular is treated as the urgent public health concern that it is**, and we are determined not to slip back into old ways of working.

We are pleased that as the pandemic has persisted, the Government has remained committed to keep providing this level of support, as a public health measure, as it has meant that we can continue providing support to people at risk of homelessness, wherever and however they present. Policies such as priority need, and tests for local connection, intentionality, and even ‘No Recourse to Public Funds’ (NRPF) have been largely suspended, meaning we have been able to help people into temporary and permanent accommodation who would previously not have been eligible for this assistance. We look forward to hearing the Government’s plans for reviewing and hopefully removing these arbitrary barriers in the future once the emergency pandemic legislation expires.

As we are now approaching two years since we began the ‘everyone in’ programme, we do note that there is a definite degree of fatigue within the system, evidenced by the ever-increasing numbers of people still in temporary accommodation (TA) awaiting permanent rehousing, as well as the creeping numbers of people sleeping rough in recent months. The overarching reasons for this are largely to do with a lack of suitable housing options for people to move into, as despite the ambitious housebuilding programmes of the Welsh Government and local partners, demand continues to outstrip supply. It is also proving harder than ever to secure tenancies in the private rented sector as rent levels continue to rise and rise, contributing to the growing cost of living crisis.

We broadly support the Welsh Government’s turn towards a rapid-rehousing model of support to end homelessness, with the caveat that we clearly need to manage the significant demand for temporary accommodation in the short term. According to the latest statistics for November 2021, there were 7,238 people in TA, and this number is steadily increasing as each month more households present than are successfully moved into permanent homes. **Oversubscribed TA services and overstretched support staff will only make it harder to clear this backlog, and there are real risks to individual’s physical and mental health if they are left in temporary accommodation for too long with minimal support.** And in the worst cases, people may decide they would prefer a life on the streets than languishing in TA with no end in sight. We must do everything we can to prevent this, but after a physically and mentally draining two years, staff and clients are struggling.

Our views on the reasons for the apparent increase in the number of people sleeping rough and what can be done to reverse it.

This is deeply worrying to us, particularly as measures taken at the height of the pandemic effectively brought almost every individual into emergency accommodation. It is alarming to see increasing numbers for cities like Newport and Cardiff, but also in recent months in more rural counties like Pembrokeshire and Powys. Local authorities and partners across the sector must continue their vital work to ensure more people are supported into safe and sustainable homes as swiftly as possible. The longer people are left in temporary accommodation with no end in sight, the more likely they are to decide to return to a life on the streets, despite the risks this poses to their physical and mental health. In order to reverse this steady increase in the numbers of people sleeping rough, we need to ensure that services to support people experiencing homelessness remain appropriately funded and staffed in order to meet their needs. **Our experience tells us that services need to have a specific focus on the needs of people who have experienced complex trauma or adverse childhood experiences**, as they are at a higher risk, not just of homelessness, but also of poor mental health, substance misuse, and coming into contact with the criminal justice system. The complex interconnected nature of these challenges must be recognised in order to support people who are most at risk.

On a point about homelessness statistics, we are also interested in the reliability of the monthly data published by WG on the use of temporary accommodation and rough sleeping. Although we do not work in every local authority, we do note that our internal data does not always align with the numbers reported as sleeping rough by the local authorities. We are particularly interested in the four local authorities which have reported zero individuals rough sleeping since November 2020 – we would like reassurance that Blaenau Gwent, Carmarthenshire, Rhondda Cynon Taff and the Vale of Glamorgan are presenting a genuine picture of their current situation, rather than just returning a figure of zero due to limited data collection.

Prior to the pandemic The Wallich led on a Welsh Government-funded project to trial a [multi-agency database](#) recording information about people sleeping rough in Wales. Although the project was not without its challenges, we would welcome the opportunity to discuss the initial findings with the committee and suggest ways of ensuring a true and accurate representation of national rough sleeping data in Wales.

Our response to the Welsh Government’s *Ending Homelessness in Wales: a high level action plan 2021-2026*, including the timescales outlined in the plan and specific Actions within the plan that should be a priority for the Committee.

We responded to the Welsh Government’s consultation on the draft action plan back in November 2021. You can see our full response to this consultation here ([Our response to the Welsh Government’s Action Plan](#)). We would be happy to discuss our response in further detail if that would be useful to members of the committee.

In summary, we are broadly supportive of the high-level action plan, and look forward to seeing further details of how each action will be achieved, including some more concrete milestones and timescales. At present we feel that many of the timescales are somewhat vague, and would prefer to see 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.

We are strongly supportive of the focus on universal, targeted and crisis-specific prevention to ensure homelessness becomes rare, brief and non-repeated, and agree that this will only be possible through affective partnerships and multi-agency working. We are also hopeful that the new Homelessness Outcomes Framework will become an effective tool to hold all public services to account for the commitment to end homelessness, as we are clear that this cannot be achieved by the housing sector alone. **We would encourage the committee to take an active role scrutinising the development of the new outcomes framework, and consider too how Senedd Members can have an ongoing role in monitoring the performance of public services according to the framework going forward.**

Just to pick out a couple of other specific actions which are of particular interest to us, we would encourage the committee to further interrogate how mental health and substance misuse services will be brought into closer alignment with homelessness services. We know that a significant number of the people we support also suffer from poor mental health or substance misuse, often as a result of adverse childhood experiences (ACEs) or trauma. We consider these co-morbidities that must be addressed alongside stabilising their housing situation, in order to improve their overall wellbeing.

One additional element that is not currently mentioned in the high-level action plan 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. We feel that 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.

Our views on the allocations in the draft budget 2022-23 that support ending homelessness, as well as those increasing the supply, availability and accessibility of housing in the social and private sector.

We were very pleased to see the Welsh Government extend the £40m uplift to the Housing Support Grant (HSG) to the new baseline of £166m a year, as this provides security and reassurance for our services funded from that grant.

One small note of concern is that despite the Welsh Government able to provide a three-year indicative budget for the first time in some years, the HSG is not projected to rise with inflation in years two and three. We understand that inflation and the wider economic outlook is far from certain at the moment, but the cost of delivering these services is not likely to remain static whilst inflation creeps up.

Whilst we are not directly involved with the social house building programme, we do of course support the increase to the Social Housing Grant to £310m, as this will be vital, not only to meet the Government's ambitious target for new social homes in this Senedd term, but also to meeting the considerable pent-up demand for affordable, high-quality homes.

We understand that WG is currently consulting on integrating the Homelessness Prevention Grant into the wider HSG, meaning those projects will in future be commissioned by local authorities rather than the central WG housing directorate. We broadly support the principle of devolving the funds to councils in order to spend on local priorities, with the caveat that we recognise that some services may be most effectively delivered on an all-Wales basis, so there needs to be consideration to allow collaborative, national commissioning where appropriate.

Although somewhat beyond the remit of this committee, we would like to raise a concern about the Government's Section 64 fund for third sector mental health services, as although this has been temporarily extended until September 2022, we are still awaiting an announcement of any succession plan for this fund, and there were no details in the draft budget. **We believe that integrated specialist mental health provision is vital to the success of other key policies such as rapid rehousing and Housing First**, so would appreciate the committee looking into this.

Finally, we of course welcome all help provided from the Welsh Government to support people with increased costs of living, such as council tax and energy bills. Whilst immediate pressures will be challenging for all of us, help with bills for people with recent experience of homelessness will really make the difference to maintaining a successful tenancy.

Our views on priority areas for the Green Paper on legislative reform, which is expected to be published by the Welsh Government in 2022, and areas the Committee should focus its scrutiny on.

We are eagerly anticipating the Government's Green Paper on legislative reform, as despite the relatively high volume of housing legislation in recent years, we do feel that there is more we could do in Wales to end homelessness.

We of course support the campaign led by Shelter Cymru, Tai Pawb, and CIH Cymru, for a human right to adequate housing to be embedded in Welsh Law, and we are happy to discuss with members of the committee how we think this could work in practice.

We would also like to see the Government's proposals for reform of the barriers mentioned in response to the first question above: is Wales ready to permanently move away from priority need, and tests like intentionality and local connection, as we have done so successfully during the pandemic? **We feel very strongly that people should be provided housing support wherever and however they present to authorities**. It is a hugely brave thing to ask for help, and we should be determined that there must be no wrong door to knock. Services must be compassionate and willing to help, never looking for excuses to deny assistance or pass off responsibility to another agency.

Finally, we noted with interest the commitment to look at rent control measures in the Government's cooperation agreement with Plaid Cymru, and followed the debate in Plenary on the Members Legislative Proposal submitted by Mabon ap Gwynfor MS. We remain open-minded on the best approach to manage levels of rent in both the private and social sectors, but like members in this committee and across the Senedd we want to ensure a balance is struck that maintains sufficient availability of homes to rent at an affordable price, without property investment becoming an inadvertent driver of homelessness presentations.

Our response to the recommendations made by the Public Services Ombudsman for Wales in his report, Homelessness Reviewed: an open door to positive change.

We read this report from the Public Services Ombudsman with considerable interest, as it ostensibly showed that three local authorities needed to radically reform their homelessness service provision in order to meet all of their statutory obligations.

The Ombudsman has relatively limited powers of investigation or enforcement when it comes to the homelessness obligations of local authorities, and as such was only able to review the processes of three councils; Cardiff, Carmarthenshire and Wrexham. Although he also issued some broader recommendations to Welsh Government and the other 19 authorities, these are only advisory as these bodies were not the subject of the formal investigation. **We hope that the committee will pick up these recommendations and follow up on progress made as part of its own scrutiny.**

We must of course reiterate that local authority homelessness teams working on the ground have been invaluable partners throughout the pandemic, but there are obviously structural changes needed at a strategic level to support people out of homelessness, and further investigation is needed into the failings identified in the report.

The care sector has stringent national minimum standards which must be upheld and are regularly reviewed by the Care Inspectorate Wales to ensure compliance and to highlight any issues that need addressing. There are currently no equivalent oversights in place for homelessness and housing support services or the people who use them, and we call on the Government to explore options for a national regulator that focuses on living conditions, working practices and commissioning, as well as housing outcomes.

We would also like to see more focus on evidence-based commissioning, ensuring local authorities make decisions about services based on research about what works, with the data to back it up. **Too often we are seeing services commissioned which are not supported by the existing evidence base** or pay only lip-service to concepts like psychologically informed environments, rather than fully integrating this approach into the service design. This in turn leads to services which are insufficient to meet the needs of people who have experienced trauma, or who have been let down by support services in the past

The Ombudsman makes a strong case in his report for creating a housing regulator role in Wales, to add value to the development of homelessness processes and hold local authorities to account. We suggested that such a function would be required in order to uphold the newly created homelessness outcomes framework, as part of our call for accountable, evidence-based commissioning in our [2021 Manifesto](#). This committee may wish to investigate the possible role of a housing regulator, and would welcome the opportunity to share our views, and the views of the people we support, as to the remit of such a body.