Welsh Government
Consultation response form

# Ending Homelessness Outcomes Framework

Date of issue: 12 June 2023

Action required: Responses by 18 September 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh.

Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh.

**Overview**

This consultation is to gather views on the draft Ending Homelessness Outcomes Framework.

**How to respond**

Please respond by completing the online form or completing this questionnaire and sending it to [homelessnesspolicy@gov.wales](mailto:homelessnesspolicy@gov.wales)

If you intend to respond in writing, please send completed forms to:

Housing Policy Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

When you reply, it would be useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

 - your name,

 - your position (if applicable), and;

- the name of organisation (if applicable).

**Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

**Data Protection**

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

**Confidentiality**

Responses to consultations may be made public on the internet or in a report.

**If you would prefer your response to remain anonymous, please tick here**:☐

This consultation will close on 18 September. Responses to this consultation will be analysed and a Welsh Government Response will follow.

| Date: | |
|---|---|
| Your Name: | **Thomas Hollick** |
| Your Position *(if applicable)*: | **Policy and Public Affairs Coordinator** |
| Your Organisation *(if applicable)*: | **The Wallich** |
| Email / Telephone Number: | **thomas.hollick@thewallich.net / 07467120098** |
| Your address: | **The Wallich - Cardiff Hub, 18 Park Place Cardiff CF10 3DQ** |

| Type of Organisation - Choose one of the following: | Please select |
|---|---|
| Local Authority - Housing Options and Homelessness Teams | |
| Local Authority – Data team | |
| Local Authority - Other | |
| Registered Social Landlord | |
| Third Sector service provider | **X** |
| Health services | |
| Social care services | |
| Other Service Provider/Advice Agencies | |
| Member of Public | |
| Other interested party (please specify) | |

**In which specific countries do you operate?**

| |
|---|
| **Wales** |

**QUESTIONS:**

# Question 1

The Ending Homelessness Outcomes Framework identifies six overarching strategic outcomes:

1.      Rare

2.      Brief

3.      Unrepeated

4.      Workforce

5.      Public Service response

6.      Person-centred approach

**Based on the key principles of the framework (in section three), to what extent do you agree the above areas are the right strategic focus for the framework?**

- **<mark>Strongly agree</mark>**

- **Agree**

- **Neither agree nor disagree**

- **Disagree**

- **Strongly disagree**

If 'strongly agree / agree' - Please explain why you consider these strategic outcomes are the right areas to include in the Framework

If 'strongly disagree / disagree' – Please explain what strategic outcomes should be excluded; or others that should be included.

*Please consider the Key Principles in Section 3 of the Ending Homelessness Outcomes Framework consultation document* https://www.gov.wales/ending-homelessness-outcomes-framework *when proposing suggestions.*

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The six overarching strategic outcomes are useful headings as they align closely with other work that has been carried out in the sector by those thinking about what it would mean to end homelessness.

The first three headings; *Rare*, *Brief* and *Unrepeated*, directly echo the structure of the Welsh Government's Ending Homelessness Action Plan, which itself draws upon the work of the Homelessness Action Group.

The heading of *Public Service Response* at least partially reflects the importance of partnership working as emphasised in the Ending Homelessness Action Plan, and recognises the point that many in the sector have been making for some time, that homelessness is not just a housing issue, and requires a fuller response from other sectors such as health, social care, and criminal justice. This heading also explicitly references that public services must be trauma-informed, in line with the Trauma Informed Framework for Wales, in recognition that many people experiencing homelessness will also have experienced traumas which could inhibit their ability to access mainstream services.

The heading *Person Centred* also supports the trauma-informed approach to homelessness, recognising that every individual's circumstances are unique, and they deserve to be treated with compassion and dignity. People who experience homelessness have often been let down by many services or institutions, and their hesitancy to trust agencies offering support is often a really important survival instinct. Homelessness services should offer support to clients, tailored to how they are, not how we might like them to be.

Finally, the heading of *Workforce* provides a valuable focus on ensuring that homelessness services are effectively staffed by well-paid, highly skilled, compassionate workers who are empowered to provide the trauma-informed, person-centred support outlined in the other strategic outcomes. Crucially, this focus will improve standards through ensuring safe staff-client

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ratios and building extra capacity to allow time for reflective practice and continuing professional development.

## Question 2a

**Are there any additional detailed outcomes that you think should be included? (please refer to the definition of detailed outcomes in the Ending Homelessness Outcomes Framework consultation on pages 15 – 28)**
https://www.gov.wales/ending-homelessness-outcomes-framework

- **Yes**

- **No**

- **Don't know**

If yes, please list those you think can be improved and why.

*We would suggest that you consider the Key Principles in Section 3 of the Ending Homelessness Outcomes Framework consultation document* https://www.gov.wales/ending-homelessness-outcomes-framework *when proposing improvements.*

The current detailed outcomes seem reasonably comprehensive.

## Question 2b

**Are there any proposed detailed outcomes that you think should be excluded?**

- **Yes**

- **No**

- **Don't know**

If yes, please list those you think should be excluded and why.

## Question 2c

**Are there any proposed detailed outcomes that can be improved?**

- **<mark>Yes</mark>**

- **No**

- **Don't know**

If yes, please list those you think can be improved and why.

*We would suggest that you consider the Key Principles in Section 3 of the Ending Homelessness Outcomes Framework consultation document* [https://www.gov.wales/ending-homelessness-outcomes-framework](https://www.gov.wales/ending-homelessness-outcomes-framework) *when proposing improvements.*

We would like to see some strengthening of the proposed detailed outcomes under the *Rare* strategic outcome, particularly around children and young people at risk of homelessness. At present, the data indicators against outcome 1.3 are only counting the numbers of children and young people in temporary accommodation, i.e. once they have already presented to homelessness services and it is too late for prevention. We would like this outcome to encourage earlier interventions with children and young people in contact with social care services and education settings such as pupil referral units (PRUs), which have high correlations with experiences of homelessness in later life.

We would also like to see more specific references to substance use as an issue that commonly co-occurs with experiences of homelessness. When service users also have problematic relationships with drugs or alcohol that can be a complicating factor that prevents them from accessing the appropriate housing support services, meaning that those issues need to be addressed alongside their housing needs. A link to co-occurring substance use could be made under either the *Brief*, or *Person-Centred Response* strategic outcomes: the former because effective substance use services are essential to ensuring experiences of homelessness are not allowed to persist for longer than is otherwise unavoidable, and the latter, because a cross-sector response including housing and health services gets to the heart of what person-centred support should look like. Successful support services must be holistic, responding to the individual as they are, not just how we might like them to be.

## Question 3

Equalities, anti-discrimination and human rights underpin our Ending Homelessness Action Plan to recognise the barriers of inequality, discrimination and marginalisation that particular groups are much more likely to face.

We have attempted to reflect this in the EHOF through:

- Rare: Detailed Outcome 2 - Groups at greatest risk are identified and measures put in place so that fewer people in those groups experience homelessness and

- Strategic Outcome 6: Person Centred, and underpinning outcomes.

**To what extent does the outcomes framework adequately help to measure progress against this overarching goal?**

- **Strongly agree**

- **<mark>Agree</mark>**

- **Neither agree nor disagree**

- **Disagree**

- **Strongly disagree**

If 'strongly agree / agree' - Please explain why you consider the outcomes framework adequately helps to measure progress against this overarching goal?

If 'strongly disagree / disagree' – Please explain why you don't consider the outcomes framework adequately helps to measure progress against this overarching goal?

> It is important to recognise that some groups of people face a disproportionate risk of homelessness compared to others, both in terms of likelihood and the impact of that experience. This includes racially minoritised groups, LGBT+ people, people with disabilities, and others with protected characteristics under the Equality Act 2010, but also other groups, including people who have experienced trauma or adverse life experiences, people who use drugs or alcohol, people with poor mental health, or those who have been in contact with the criminal justice system. Many people we support across homelessness services may have multiple, complex, or overlapping needs arising from these factors.
>
> In order to recognise and respond to these inequalities and risks of further marginalisation, we must design services to be fully inclusive, removing any possible barriers and indirect discrimination. This in turn becomes the rationale for truly person-centred services, as outlined in Strategic Outcome 6. Homelessness and housing support services are at their best when they are able to flexibly adapt to the unique individual needs of clients as they present, rather than preparing for archetypes that may be unrealistic.
>
> We would welcome more specific language in the Framework around recognitions of neurodivergence, and the need for truly inclusive services. By this we mean not only autism, ADHD, dyslexia, and dyspraxia, but also acquired brain injuries, which can cause similar difficulties. We remain concerned that people with (often undiagnosed) brain injuries face a disproportionately higher risk of homelessness compared to the general population, and services need to be psychologically informed and responsive to these unique needs.
>
> As the draft Outcomes Framework indicates, effective data collection will be essential to ensure we are meeting this ambition to develop more inclusive, person-centred services, and whilst some

data is collected at present, there is more that can be done. Indicators 6.2 a) to d) are positive proposals, so long as the list of 'at risk characteristics' to be collected is proportionate and consistently recorded across all local authorities and project types. There also needs to be some sort of formal recognition that not all people accessing services will be prepared to disclose having these characteristics at their initial assessment, or indeed at all.

# Question 4

**Unrepeated**: Detailed Outcome 1 - *People do not experience multiple episodes of homelessness* identifies a data indicator *(a) The number of households who received a relief duty (S73) who later (within X months) submitted a further homeless application (absolute, per 10,000 and as a proportion of all applications)*

**In respect of experience of repeat homelessness, what do you consider to be an appropriate timeframe to capture data for a household who has received a relief duty, and then *(within X months)* submitted a further homeless application?**

i) <mark>6 months</mark>

ii) 12 months

iii) Other (please specify)

Please provide reasons for your answer.

We believe that the timeframe for recording experiences of repeat homelessness should be six months. If an individual or household is successfully rehoused in a private or social tenancy, only to lose that tenancy within the first six months, that would suggest that the tenancy was not appropriate in the first place. Under the Renting Homes Act 2016, tenants cannot be evicted within the first six months of a contract, and the notice period is a further six months, provided no other contract breaches have occurred (such as domestic abuse or anti-social behaviour). As 'no-fault evictions' are not possible within this period, tenancy failures are likely to be caused by some other underlying and unaddressed issue.

We are also worried about possible unintended consequences of this proposed timeframe; if an individual presents to homelessness services multiple times within this period because of multiple failed tenancies, this could be interpreted as 'intentionally homeless' under current legislation (although we note that the Welsh Government legislative review is considering reforming or removing rules around intentionality in future, which is something we welcome at The Wallich). Whatever timeframe is ultimately chosen for this detailed outcome, we feel strongly that this should not become grounds for denying support to people who are not successfully rehoused at the first attempt.

The six-month timescale also aligns neatly with a number of other proposed indicators, including reports of the number and percentage of households sustaining tenancies for at least six months after receiving support.

## Question 5 (a)

**Unrepeated**: Detailed Outcome 3 - *People can access the right home in the right place*.

We recognise this is a difficult outcome to measure and the proposed data indicators are currently **not** captured in existing data collections (although indicator b can be proxied using an indicator from the Housing First tracker by Cymorth Cymru in the interim).

**Please set out for each of the potential future data indicators below, whether you think they can be used to measure progress against the outcome?**

(a) Number and percentage of people who are sustaining tenancies 6 months after receiving support (Low/Medium needs)

- <mark>**Yes**</mark>

- **No**

- **Don't know**

(b) Number and percentage of people who are sustaining tenancies 6 months after receiving intensive housing led support such as Housing First (High Needs)

- <mark>**Yes**</mark>

- **No**

- **Don't know**

(c) Number and percentage of people who have stayed in supported accommodation who are sustaining tenancies 6 months after commencement of tenancy (Intensive needs)

- <mark>**Yes**</mark>

- **No**

- **Don't know**

If you have responded 'no' to any of the proposed indicators please can you provide the reason for your response including any alternative data indicators you might suggest*.

*New data suggestions will be considered in terms of current and potential availability

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It might also be useful to record details of the reasons for tenancy failures within the first six months, as that could provide useful context and learning opportunities for the support providers. Common reasons that could be tracked would include evictions for anti-social or violent behaviour, remand or recall to prison, or a death.

The additional context around the end of tenancies will be particularly important in cases involving substance use, as we know that relapses often occur as part of someone's recovery journey, and that this does not necessarily mean failure. An example might be someone taking up a tenancy in an abstinence-based supported accommodation project; if they have a relapse, they might be asked to leave the project for the safety of other residents, but that might not be a permanent decision, and shouldn't necessarily be considered as an inherently negative outcome. In truly person-centred services, responding to challenges and changing needs, transitions do not mean failure.

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## Question 5 (b)

Data indictors (a), (b) and (c) above refer to a 6 month timeframe for sustaining tenancies.

**To what extent do you agree with this 6 month timeframe?**

- **<mark>Strongly agree</mark>**

- <mark> </mark>**Agree**

- **Neither agree nor disagree**

- **Disagree**

- **Strongly disagree**

## Question 6 (a)

**Brief**: Detailed Outcome 2 - *Nobody experiences homelessness long-term* identifies a data indicator *(a) The number of households experiencing long-term homelessness (absolute and rate per 10,000 households)*

**What do you consider to be a suitable timeframe to measure long-term homelessness?**

i) 6 months

ii) 12 months

iii) Other (please specify)

Please provide reasons for your answer.

We believe that any experience of homelessness for any amount of time is unacceptable, so for this reason we would want any definition of 'long-term' homelessness to be as short a time as possible, certainly no longer than six months.

We recognise the value of creating a data indicator and outcome to monitor long-term homelessness, but it is important that any arbitrary timeframe established for monitoring purposes does not become a target or barrier for people seeking support before that time has passed. We do not want to create a perverse incentive for services to prioritise support for people who have been experiencing homelessness for longer at the expense of those whose difficulties began more recently, or indeed vice-versa.

## Question 6 (b)

**Brief**: Detailed Outcome 2 identifies a data indicator *(b) The number of people experiencing long-term street homelessness (absolute and rate per 100,000 population)*

**What do you consider to be a suitable timeframe to measure long-term street homelessness?**

i) 3 months

ii) 6 months

iii) Other (please specify)

Please provide reasons for your answer.

As above, we believe that any experience of homelessness for any amount of time is unacceptable, and that is also the case for street homelessness. Just one night spent sleeping rough is one night too many.

Once again, we recognise the value of creating a data indicator to monitor street homelessness, but we have been concerned about the consistency of data collected across all local authorities for some time. We understand that a number of different local authorities take a wide variety of

approaches around recording rough sleeping: some rely upon a physical count of people seen bedding down, others rely upon self-reported figures, and others set arbitrary thresholds, such as requiring to see the same person bedding down for a number of consecutive nights, or a number of occasions in a specified period. We are generally opposed to an arbitrary 'verification process', and instead think that we ought to believe people when they say they have nowhere to stay.

By its very nature, the population of people living street-based lifestyles is likely to fluctuate significantly, as individuals often bounce between temporary accommodation, sofa surfing and rough sleeping, depending upon relationships beginning and ending, support being offered or withdrawn, and even the weather. 'Fair-weather' sofa surfing or rough sleeping is likely to be missed in any official statistics, but still deserves appropriate housing support.

Whatever decision is made regarding this data indicator, we need to see consistent processes for collecting and reporting numbers of people living street-based lifestyles across all 22 local authorities, so that we can be confident that some areas are not under-reporting the scale of the challenge.

## Question 7

**Public Service response:** Placeholders have been identified as potential data indicators for the future.

**Are there any current data indicators which exist you would like to make us aware of relating to the wider public service response?**

- **Yes**

- **No**

- **Don't know**

If 'yes' - Please explain which existing current data indicators relating to the wider public service response.

There is limited public data available around the intersections between housing and homelessness and other public services, particularly around health outcomes. As part of another recent piece of work looking at access to mental health services, we found that not all health boards even record the housing situation of patients, meaning that we have next to no visibility of how health outcomes of people experiencing homelessness vary from the wider population across Wales. The first step therefore is for robust, consistent data collection on homelessness and housing tenure across all other public services, particularly in health settings where there is some of the strongest anecdotal evidence of barriers to access and poorer outcomes overall.

The other way of approaching this data gap, as opposed to relying upon other public services to collect better data on housing and homelessness, is to directly survey people in contact with housing services about their experiences accessing other public services. A model we would like to see tried in Wales is that of the Homeless Health Needs Audit, carried out by Homeless Link in England. Based on direct survey data, we can track health outcomes amongst people experiencing homelessness compared to the wider population, and learn about any barriers that might exist

and how they might be overcome. This model could also extend to other public services beyond health, including police and criminal justice, education, public transport, and social services.

In the longer term, we need a variety of different data sources in order to assess progress against the strategic outcome of a cross-public service, trauma-informed response to homelessness, and we are supportive of any and all efforts to establish consistent national datasets for this purpose. There is a lot of interesting work ongoing looking at linking different sources of administrative data, and this could be a useful avenue for joining the dots between homelessness services and other public services which at present record data in a variety of different ways.

## Question 8 (a)

We would like to know your views on the effects that the Ending Homelessness Outcomes Framework 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?**

We do not believe that the Outcomes Framework itself will have any specific positive or adverse effects on the Welsh Language. Under other provisions, people will have the right to access homelessness and housing support services in the language of their choice, and members of staff will have the right to work in the language of their choice, including in recording monitoring information for the purposes of the Outcomes Framework.

Local authorities and service providers should continue ongoing work to grow the bilingual capacity of services.

## Question 8 (b)

**How could positive effects be increased?**

No comment

## Question 8 (c)

**How could negative effects be mitigated?**

No comment

## Question 9

We also want to understand how proposed Ending Homelessness Outcomes

Framework 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.

How do you think the framework could be formulated or changed to have positive effect on the Welsh language?

**Response:**

> No comment

## Question 10

We have asked a number of specific questions. If you have any additional feedback about the Ending Homelessness Outcomes Framework, please record this here:

**Response:**

> As alluded to elsewhere in our response, our primary concern around this new draft framework is our hope that data indicators will be interpreted and collected consistently across all 22 local authorities, something that has proved difficult in the past. A recent example of this was the rollout of the revised Housing Support Grant Outcomes Framework, which has been interpreted somewhat differently by a number of different local authority commissioners. This has meant that for The Wallich as a service provider operating in 19 different local authorities, we are required to collect and report client data in 19 subtly different ways. Not only does this create duplication and extra work for our services, it also makes it difficult to compare performance across otherwise similar types of service in different parts of Wales. We are very keen that any new datasets to be collected as part of this framework are measured and recorded consistently according to clearly defined parameters set at a national level.
>
> We are also interested to hear more about how the Welsh Government and partners will be held accountable for delivering the outcomes set out in this framework. What is the intended scrutiny pathway? Will it be for Members of the Senedd to challenge the Government on performance in committees and plenary sessions? Do you envisage a role for another national scrutiny body such as Audit Wales? Whoever has ultimate responsibility for scrutinising delivery against the framework needs the time and resources to get into the detail of each of the detailed outcomes and indicators to ensure progress is being made in each area.
>
> Finally, we would like to make a broader point about funding. A number of the outcomes set out in the draft framework are likely to have financial implications for our services, which are currently having difficulty meeting record high demands despite no increase to HSG in the latest Welsh Government budget to keep up with record inflation. Some of the most obvious examples are the detailed outcomes against *Workforce*; we share the commitment to develop a highly skilled, motivated workforce to deliver housing support services, but funding pressures are making it difficult to offer a living wage, let alone a more competitive salary reflecting the

challenges they face and the experience and compassion they bring to the sector. A truly trauma-informed service, staffed by experts who have the time to deliver high-quality person-centred support, and also engage in professional development and continuous reflective practice, is of course essential to ending homelessness in Wales, but it requires investment commensurate with the level of the challenge we face, which currently just isn't there.