

Agenda – Local Government and Housing Committee

Meeting Venue:

Committee Room 5, Tŷ Hywel

Meeting date: 6 March 2025

Meeting time: 09.00

For further information contact:

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Committee Clerk

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Private pre-meeting

08.45 – 09.00

1 Introductions, apologies, substitutions and declarations of interest

09.00

2 Housing support for vulnerable people: Evidence session 1

09.00 – 10.00

(Pages 1 – 50)

Sam Austin, Chief Executive, Llamau

Sian Aldridge, Director of Operations, The Wallich

Emma Shaw, Assistant Director of Strategic Operations and Development –
Wales and West England, The Salvation Army

Jim Bird-Waddington, Chief Executive Officer, Goleudy

Break

10.00 – 10.10

3 Housing support for vulnerable people: Evidence session 2

10.10 – 11.10

(Pages 51 – 87)

Katie Dalton, Director, Cymorth Cymru

Jasmine Harris, Senior Policy and Public Affairs Officer, Crisis

Oliver Townsend, Head of Policy and Campaigns, Platform

Nicola Evans, Director, Housing Justice Cymru

Break

11.10 – 11.20



4 Housing support for vulnerable people: Evidence session 3

11.20 – 12.20

(Pages 88 – 105)

Clare Budden, Group Chief Executive, ClwydAlyn

Rhea Stevens, Director of Policy and External Affairs, Community Housing
Cymru

Sarah Schofield, Director of Customers and Communities, Adra (Tai) Cyf

Break

12.20 – 13.00

5 Housing support for vulnerable people: Evidence session 4

13.00 – 14.00

(Pages 106 – 116)

Elliw Llŷr, Policy, Strategy and Commissioning Manager, Isle of Anglesey
County Council

Andy Thompson, Head of Housing, Powys County Council

Councillor Andrea Lewis, Deputy Leader of Swansea Council, Welsh Local
Government Association

6 Motion under Standing Order 17.42 (ix) to resolve to exclude the public from the remainder of this meeting and for items 1 and 2 of the meeting on 19 March

14.00

Private meeting

14.00 – 15.00

7 Housing support for vulnerable people: consideration of evidence

14.00 – 14.20

8 Business Committee review of the Public Bill and Member Bill processes

14.20 – 14.40

(Pages 117 – 120)

9 Elections Information Platform Regulations

14.40 – 14.50

(Pages 121 – 130)

**10 Supplementary Legislative Consent Memorandum Renters' Rights
Bill: consideration of draft report**

14.50 – 15.00

(Pages 131 – 133)



Llamau Response to Local Government and Housing Committee Inquiry **– housing support for vulnerable people**

Llamau welcomes the opportunity to provide written evidence to the Local Government and Housing Committee Inquiry. Our response has drawn on the expertise of the people we are privileged to support, our Young People’s Leadership Group, the senior leadership team and operational colleagues.

It is vital to acknowledge the importance of keeping Housing Support Grant (HSG) as a **ring-fenced** funding stream. There is clear evidence from England about the decimation of support services when their equivalent funding was unhypothecated. Equally, in Wales we have also seen the difficulties social care providers have experienced when additional funding has been difficult to identify in the unhypothecated Revenue Support Grant (RSG). Without a ring-fenced funding stream, at a time of cuts and budget shortages, HSG will be, at best, diluted. It is essential this is not allowed to happen.

HSG constitutes over 60% of Llamau’s annual funding, delivered through a range of contracts across most local authorities in Wales. Last year we supported over 11,000 young people, women and children across Wales, including over 500 in our supported accommodation services. 94% reported our support had a positive impact on their lives and 93% reported feeling safer following Llamau’s support.

1. Effectiveness of Welsh Government Planning for HSG in Light of Rapid Rehousing and the Homelessness Bill

Llamau welcomes the emphasis on Rapid Rehousing to enable people to move quickly into sustainable accommodation that meets their needs, however HSG must be used to provide appropriate support to enable the maintenance of that accommodation. We strongly believe Rapid Rehousing should offer long term stable accommodation, of at least 12 months or more, to enable people to feel settled and part of a community. This is particularly important for people with school age children.

However, rapid rehousing should not be seen as the cheaper alternative to specialist supported accommodation for certain client groups. For example, young people who are homeless and young people who are care leavers often lack both the independent living skills to live on their own successfully and often have other support needs which means specialist supported accommodation is more appropriate, and also proven to have long reaching and sustainable outcomes.

Young people particularly often struggle with isolation if moved into their own accommodation, without the necessary support and are more vulnerable to having a lack of control over their front door and their accommodation being used for 'cuckooing'.

Llamau operates small, specialist supported accommodation projects for young people, gender specific services and refuges. There is clear evidence that smaller accommodation services, which provide as close to home environments as possible, have more positive outcomes and enable people with more complex support needs to move on successfully. Yes, smaller services are more expensive because of the lower number of bedspaces, however they deliver better and longest lasting outcomes and are therefore more cost effective. We would welcome the Committee consider recommending higher levels of funding to specialist supported accommodation services with smaller number of bedspaces to enable these to be properly funded and adequately staffed, to provide the right level of support. Currently Llamau frequently bears the cost of additional staffing when needed, to manage risk or complexity of support needs to enable someone to remain safely within the project.

The current funding model for HSG funded supported accommodation relies on a percentage of salary costs being determined as housing management (usually 20%), with an expectation this amount should be recovered from rent and service charge, rather than HSG funding. This means supported accommodation rents become very expensive, making it difficult for people to work while living in this accommodation. Llamau strongly believes supporting young people to get back into work, training and education is essential, in order to reduce the risk of repeat homelessness; however when a young person is ready to begin looking for work, this becomes prohibitive, if they are still living in supported accommodation.

Early Identification, Intervention, and Prevention Programmes: Research shows nearly 50% of adults who were rough sleeping, first experienced homelessness before the age of 21, with a shocking 73% experiencing homelessness more than once. Early Identification and Intervention programmes, such as Llamau's [Upstream Cymru](#), are vital in preventing homelessness by identifying people at risk and providing early support before a crisis occurs.

Homelessness prevention services are now funded via HSG. Due to the growing homelessness crisis, local authorities in Wales are diverting funds from prevention services into crisis services, a short-sighted approach that fails to address homelessness at its roots. Services like family mediation and advice are essential for preventing homelessness before it escalates. A proactive, preventative approach is key to tackling homelessness sustainably. HSG guidance only allows funding to be allocated for services working with people aged 16 and over. This means mediation and Upstream programmes that work with younger ages cannot be funded via HSG. This leads to a funding vacuum for prevention services working with school age children and young people.

Funding for early identification, intervention and prevention services should be protected under HSG funding. Early intervention is more cost-effective, reducing the long-term strain on emergency services.

2. Pressures on the Delivery of HSG-Funded Support Services, Including Workforce Challenges

The proposed increases in National Insurance contributions and the Real Living Wage, along with the ongoing need to maintain salary differentials, will add £1.5 million to Llamau's operational costs in 2025-26. Many of our commissioned services are already operating at a deficit due to chronic underfunding and the lack of necessary uplifts to the Housing Support Grant (HSG). This situation has made it increasingly difficult to maintain services, and without additional resources, it is not sustainable.

Llamau, alongside other third-sector organisations, plays a vital role in preventing and responding to homelessness. However, without adequate yearly increases in funding, we face the real risk of service cuts, impacting staffing levels, support hours, and the ability to provide specialised services.

The societal consequences of insufficient funding are far-reaching. If we are unable to deliver effective homelessness prevention and response services, we anticipate:

- Increased homelessness, especially among vulnerable groups such as women escaping domestic violence and young people.
- Greater interaction with the criminal justice system as vulnerable people lack appropriate support.
- Overburdened healthcare services due to increased reliance on emergency healthcare.
- Escalating domestic abuse cases due to housing instability and inadequate support systems.
- Increased safeguarding risks as vulnerable people are left without proper care.
- Higher rates of substance misuse as support for addiction issues wanes.
- Greater exploitation and abuse risks for vulnerable people.
- Heightened feelings of insecurity, exacerbating the vulnerabilities of affected people.
- These risks not only affect people but also place greater strain on public systems such as justice and healthcare, ultimately impacting community safety.

Increased Funding for Core Services: To sustain and improve the quality of services, funding must reflect the true cost of providing specialised, trauma-informed support to people facing complex issues. Llamau's services cater to people with mental health issues, substance abuse, trauma, domestic abuse histories, and those exposed to violence or exploitation. These people face multiple

challenges requiring a multi-disciplinary support approach. However, inadequate funding restricts our capacity to provide necessary staffing, expertise, and resources. Trauma-informed care requires highly trained staff and properly allocated resources to ensure safety and recovery. To maintain high-quality services, funding should be adjusted to account for the growing costs of recruitment and retention, specialised training, and flexible support. Without adequate funding, we risk compromising the quality of support, undermining the long-term success of our projects, and ultimately failing those who need support the most.

Staff Retention and Well-being: Investing in colleague well-being is crucial for the sustainability of our services. Frontline workers in housing and support sectors face immense pressure due to low pay, high caseloads, and insufficient support. These factors contribute to high turnover, burnout, and strain on morale. This disruption not only affects service continuity but also increases costs due to ongoing recruitment and training of new colleagues and the need to use agency staff to fill gaps. To ensure a healthy and vibrant supported housing sector in Wales, it is essential to provide a supportive work environment that includes competitive remuneration, professional development, emotional support, and manageable caseloads. These measures will help reduce turnover, improve job satisfaction, and ultimately enhance service quality. Retaining experienced staff is critical to maintaining high standards and ensuring the consistency and continuity of support.

Support to Cover Extra Costs of Agency Workers for Double Cover at Projects: Due to safeguarding requirements, Llamau often incurs additional costs for agency workers to provide double cover at projects, ensuring the safety of staff and the people we support. This is especially crucial in high-risk situations, but the associated costs are not always consistently covered by commissioners or Children's Services. To continue meeting safeguarding requirements, HSG services must be adequately funded to cover these additional costs. Without this support, we face operational challenges that could compromise safety and service delivery.

Additional Agency Worker Cost Support Due to Recruitment Challenges: Recruitment in the sector has stalled since the pandemic, with many experienced workers leaving for higher-paying public sector roles. This has forced the sector to rely more heavily on agency workers, which incurs a significant financial cost—typically 60% to 87% higher than directly employed staff. This additional strain on budgets impacts our ability to maintain consistent, high-quality service delivery. It would be more cost effective to appropriately fund the sector to enable appropriate rates of pay and adequate staffing levels, to enable us to reduce reliance on temporary staff, enhance recruitment efforts, and stabilise the housing support workforce.

Addressing the Resource Gap in Safeguarding and Risk Management Efforts: Due to the increasing complexity of support needs we are seeing in our housing support services, we are seeing an increasing need to attend critical

forums such as Multi-Agency Safeguarding Meetings (MASMS), High-Risk Panels, and Weekly Tasking Meetings. These forums are essential for ensuring the safety and well-being of people we support. However, the time spent on these activities is not factored into the HSG funding model, leading to resource constraints. To maintain the effectiveness of safeguarding efforts, funding must be adjusted to support this necessary engagement.

3. Knowledge of Service Performance, Including Data on Outcomes

In addition to reporting WG outcomes to commissioners, Llamau conducts its own outcomes and performance management measures. These include progress against key support issues, move on sustainability, safety and risk management etc.

Lack of Feedback and Data Utilisation: Although the Welsh Government has agreed on specific outcomes to be reported, each local authority requires additional reporting, which significantly increases the administrative burden on service providers. The current data collection approach captures only a moment in time, missing the critical element of tracking progress over a longer period. Effective outcomes measurement should involve monitoring the trajectory of people as they move through services, measuring their improvement and resilience over time, rather than just recording a static snapshot that doesn't provide a full picture of their journey.

Limited Tracking of Long-Term Housing Stability: There is insufficient tracking of housing stability outcomes once people transition from temporary to permanent housing. This limits the ability to evaluate whether people who are housed through HSG-funded services can maintain their housing in the long term, which is a key indicator of success., Llamau tracks 6, 12 and 18 months after support, demonstrating the effectiveness and long term success of our support.

4. Effectiveness of Joint Working Between Housing Support Services and Public Services

The effectiveness of joint working can be very dependent on the local authority where support is being delivered. At Llamau we experience both excellent and poor multi-agency working. Frequently we, as the support provider, can be stuck between local authority departments, particularly when supporting young people. The threshold to access adult social services is often very different to those in children's services and young people often struggle to access the services they need as they turn 18. We also often see young people approaching 18 being denied more costly additional services because they are about to turn 18. Whilst many of the young people we support may be in their late teenage years, their cognitive age is often much younger, due to previous trauma and other negative experiences. This also impacts on their ability to access the right mental health support.

We still see young people being denied certain mental health services because they may be using substances, or are labelled as having 'behavioural' issues etc. This 'gate-keeping' has sadly increased as services struggle with work load. Young people are being let down.

Llamau is signed up to WASPI information sharing protocols and is usually given the necessary information around any risk to appropriately risk manage any support issues which may occur with someone we are supporting. At times however, information sharing can be erratic or information can be withheld. This can mean risk management of significant support needs is made more difficult. In some police areas we have also seen a reluctance of police to assist when we are required by Children's Services to record a young person's absence as a MISPER or when we require Police support to manage an ongoing incident with someone we are supporting.

Request for Timely Payments of Invoices/Requested Income: Delays in payments from Housing Benefit Departments and Children's Services for placement costs have significantly impacted cash flow in recent years, putting us at risk of lost income. To mitigate this, we request a commitment to more timely payments for invoices and placement costs. Speedier processing will alleviate financial pressures, ensuring that we can continue providing the necessary support for vulnerable people. This will improve operational efficiency and ensure the sustainability of our services in the long run.

Review of Housing Benefit Assessment Processes and Prioritised Approval for Support Providers: A significant challenge for Llamau is the lengthy approval process for Housing Benefit, rent, and service charge breakdowns, particularly at the beginning of each financial year. In many local authority areas, approval for these payments often takes several months, creating financial strain. We understand the pressures local authorities face, but the delay in payments is unsustainable for organisations like ours. We propose a review of the Housing Benefit assessment processes to streamline and expedite approvals, with priority given to payments for support providers. Ensuring timely and efficient assessments will allow us to continue providing essential support and maintain financial stability. Addressing these delays will have a positive impact on our ability to meet the needs of vulnerable people and ensure the ongoing success of our services.

5. Recommendations for Services to Support People with Complex Needs

Small, specialist supported housing services should be adequately funded to enable people with complex support to have access to the right level of support.

Post Covid, we have seen a considerable increase in the numbers of young people and women we support who have very complex support needs. This has meant the need for better multi-agency working and support, and additional funding to

provide adequate staffing levels and wages is more important than ever. We know that smaller specialist 24hr supported accommodation enables people with complex support needs to achieve positive outcomes and move on successfully, but this cannot continue to be achieved on existing funding levels. Very experienced colleagues are leaving the sector because wages remain low, yet the complexity of support need has considerably increased.

We are seeing more young people and women than ever before who are in mental health crisis and whose needs are not being met by health services. Many of these are struggling to cope with a lack of mental health support and are significantly self-harming or are experiencing strong feelings of suicide ideation. Mental health services can be dismissive of these presentations of crisis and discharge without appropriate information on how best to support. We are frequently told to ignore suicidal behaviours which are often labelled 'attention seeking', yet to do so could cause Llamau staff to be negligent if someone experienced serious harm. We are therefore often put in an invidious position and the toll on colleagues can be considerable, often leading to vicarious trauma.

End Youth Homelessness Cymru's research evidenced that young people who are neurodiverse are at greater risk of homelessness. It is important staff are able to access specialised training to foster an understanding of neurodivergence, and the development of individualised support plans based on thorough assessments of strengths and needs. A coordinated multi-agency approach involving mental health services, education providers, and social care is crucial to ensure integrated support. Creating sensory-sensitive environments in supported accommodation, offering flexible communication methods, and providing tailored education and employment pathways will better meet the needs of neurodivergent people.

Again, post Covid, we are seeing more young people presenting with risks associated with weapons, child criminal exploitation (CCE) and related issues, requiring comprehensive and targeted intervention. To effectively manage these risks, we have been working collaboratively with specialist agencies, such as St Giles and FEARLESS, to develop tiered toolkits and tailored programmes.

In all of the above examples, strong multi-agency partnerships with Children's Services, Health and Police/YOS/Probation are essential in order for the needs of these young people to be safely met. Additional funding to allow higher staffing levels and psychological and wellbeing support to teams is essential.

Local Government and Housing Committee inquiry 2025 – Housing Support for Vulnerable People

Response from The Wallich

How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill.

We have some concerns about the Welsh Government's planning for the future of Housing Support Grant services.

Firstly, we remain broadly supportive of the general principles underpinning the HSG, as the Government's primary fund for delivering services to prevent and address homelessness in Wales. In particular, we welcome a number of the specific values emphasised in the [practice guidance for commissioners](#), particular the expectations that:

- The earliest preventions are most effective and most cost effective and should always be the interventions of first choice.
- Tackling and preventing homelessness is a whole public services matter – rather than simply a 'housing matter.'
- All services should place the individual at the centre, working to their strengths and supporting them to achieve their aspirations.
- Services should be commissioned and delivered in a psychologically informed way, taking into account the impact of trauma on people who require support, to achieve a sustainable impact.
- Policy, service delivery and practice should be informed and shaped in a co-productive manner with service providers and those with lived experience.
- The duties in Part 2 of the Housing (Wales) Act 2014 should be the last line of defence – not the first - and all services should work to the spirit not simply the letter of the law.
- We expect all services to treat people with respect and as experts in their own lives, to work with empathy, listening and building trusting relationships and to be accountable to service users, the public and service commissioners.
- Housing support must be delivered in a way which enables the effective delivery of complementary public services by ensuring their impact is not undermined by unstable housing circumstances.

These principles are in our view the right ones to ensure homelessness services are best prepared to meet the needs of everyone who presents, however we do not believe that these principles are being followed in all parts of Wales, by all local authorities commissioners and all service providers. Due to record levels of presentations and ongoing pressures on temporary accommodation, we have moved away from preventative working in some areas, in order to triage people according to the urgency of their needs, meaning many households are being left until they reach crisis point rather than being supported earlier.

We also worry that some commissioners are not being realistic when they issue tenders for psychologically informed services which cannot possibly meet the true costs of such services. In order to deliver services which are psychologically informed environments, staff-client ratios must be realistic to allow time for meaningful training and development, supervision and reflective practice, and a recognition of the risks of vicarious trauma. We would like to see more HSG commissioners better reflect the above principles to establish better services, and Welsh Government needs to recognise the full cost of such services when setting the HSG in future budgets.

Progress towards embedding a Rapid Rehousing model across Wales has been slow for a number of reasons. [The Welsh Government first asked](#) all twenty-two local authorities to develop and publish a Rapid Rehousing Transition plan by September 2022, although almost all missed this deadline, and some remain unavailable for the public to view online even now. We are sympathetic with the local authorities as typically the team responsible for developing these transition plans are also the same individuals working hard to address the crisis levels of demand for temporary accommodation, and there simply has not been enough staff resource to focus on the new model.

Of the transition plans we have seen, we feel that there is insignificant detail when it comes to assessing the current and future needs of the local population. For example, we want to see local authorities produce estimates for the numbers of people with mental health, substance use, and criminal justice needs as well as a housing need, and set out a route map to ensuring there are sufficient multi-agency services in place to address those needs. This is what we mean when we say that homelessness cannot be seen solely as a housing matter: for Rapid Rehousing or Housing First to be successful, service users must be supported holistically by the full range of public services, otherwise they risk tenancy failure and a return to the revolving cycle of homelessness.

It is important however to note that there has been some real progress made on the support-side of Rapid Rehousing. The Wallich currently runs a number of Rapid Rehousing and Housing First services across different areas of Wales, and we have had some real

successes in getting wrap-around support in place for clients with complex needs, however the real barrier to ending homelessness for these individuals is the lack of suitable, affordable homes. An underlying principle of both Housing First and Rapid Rehousing projects is that clients should be offered a tenancy straight away, and then this should provide the strong foundation to underpin a broader recovery. Instead, our services are operating in the opposite direction, as we can get support in place whilst clients face an uncertain wait for a suitable property to become available. In order to make Rapid Rehousing a success, Welsh Government and partners across the sector must make significant progress in delivering vastly more affordable homes, through new buildings and refitting under-occupied and empty homes.

Finally, The Wallich remains firmly in support of the proposals in the recent [Ending Homelessness White Paper](#), and hope to see them introduced in a draft bill as soon as possible. The White Paper was based upon the carefully negotiated position of the [Expert Review Panel](#), as well as being informed by the testimony of [over three hundred experts with lived experience of homelessness](#), so it is vital that those proposals are not watered down or weakened in the final bill.

Undoubtedly some of the reforms proposed in the white paper will have significant impacts upon HSG services, so the Welsh Government needs to carefully think through the implications of all changes, and ensure that the guidance to commissioners is updated accordingly, and that the overall budget set for the grant is commensurate with the true scale of the challenge. For example, abolishing the priority need and intentionality rules, and reforming local connection are long overdue reforms in our view, however they will necessarily lead to more people eligible for HSG support than are able to access those services currently. This is just one example of how the forthcoming homelessness legislation will lead to additional pressures on Welsh Government and local authority budgets. We call on the Government to closely monitor this demand and increase budgets accordingly.

Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce.

Delivery of HSG-funded services has been incredibly challenging for a number of years, due to unprecedented financial pressures from static budgets in the face of ever-rising demand, and runaway inflation to the basic costs of living. The Housing Support Grant of course saw a significant increase during the pandemic in order to fund the Welsh Government's 'Everyone In' policy, however the HSG budget remained frozen between

2022 and 2024, and it took considerable campaigning efforts from the whole sector to secure a £13m uplift (7%) in 2024-25, and a proposed £21m uplift in the draft budget for 2025-26. These budget increases, whilst incredibly welcome, still only partly cover the increasing staff costs for organisations such as The Wallich, as we strive to pay the Real Living Wage to all staff.

A further financial pressure on HSG service providers has been the proposed increase to employer National Insurance Contributions from April 2025. Whilst further funding has been promised from the UK Government to cover this additional cost for public sector employers such as local authorities and health boards, the same support will not be available to third party organisations contracted to deliver statutory public services. This means that organisations like The Wallich will simply have to absorb this additional cost, at the expense of paying the higher wages we need to offer to properly recognise the important and demanding work done by frontline staff.

[Evidence from Cymorth Cymru's Frontline Network](#) found that significant numbers of staff across the housing support sector are themselves struggling financially, including being unable to pay rent and bills, using foodbanks, and being at risk of homelessness themselves. This is clearly unacceptable, however it is a direct result of the overall level of HSG funding available being insufficient to meet the real levels of housing need across Wales, and the number of contracts being awarded by commissioners which do not cover the full costs of delivering holistic, trauma-informed services. Support hours and staff caseloads must be realistic to allow time for training and development, reflective practice, and to avoid burnout from vicarious trauma. Housing Support Workers are responsible for helping people with the most complex needs in the most chaotic situations and deserve much more than minimum wages in recognition of their vital role.

Recruitment and retention continues to be a major challenge within the sector, and there is a Workforce Task and Finish Group operating as a sub-group of the [Ending Homelessness National Advisory Board](#), exploring mechanisms to ensure support staff feel valued and recognised for their expertise. This group is currently analysing data on support worker pay, as well as developing skills and qualifications pathways for frontline staff, and developing best practice guidance for commissioners, focusing on workforce terms and conditions. Our hope is that this work will go a significant way towards further professionalising the sector, and support providers such as The Wallich to attract and retain the best people to carry out vital housing support work.

Finally, aside from the outstanding issues with some local authority commissioning mentioned in our response to the first question, there are a number of discrete non-financial challenges that also impact upon design and delivery of HSG services. We often

feel that the timescales given by commissioners are not reflective of the time it takes to develop and implement effective trauma-informed services ready to support people on day one. We note that many local authorities no longer require interviews, instead relying solely on written submissions as the basis for awarding contracts. These are potentially missed opportunities for commissioners to really interrogate service providers on their plans, to ensure they are willing and able to deliver in line with the HSG's guiding principles.

How much is known about service performance, including data on outcomes.

The Welsh Government updated the [Housing Support Outcomes Framework](#) in 2023, to better recognise the cross-cutting work of HSG services intended to provide more holistic support across health and wellbeing, as well as traditional support to find and maintain housing. We supported this updated framework at the time, however since then we have seen little evidence that this new regime is helping to drive up standards across Wales in the way we hoped.

Outcomes are typically reported to local authority HSG commissioners, who in turn report these on to Welsh Government, however there is little wider visibility of how we are doing as a sector. We know that homelessness presentations remain extremely high overall, however we lack the nuanced detail of the more granular HSG outcomes in different areas and types of service. Were this data more publicly visible, we might be better able to learn from examples of good practice and identify systemic challenges.

Processes for reporting and verifying outcomes to commissioners are fairly good, and the majority of local authority housing teams carry out regular monitoring visits of our projects to ensure that our outcomes submissions are accurate and that they are aware of any persistent or emerging issues. What we do not see however, is how this outcomes data is then fed back to inform service improvements or design in future commissioning rounds. The individual officers responsible for ongoing monitoring are often not directly involved in the commissioning process, potentially disadvantaging incumbent providers even when they are delivering a good service.

We would also like to see more public discussions between different local authorities about their respective HSG outcomes, once again to share good practice and identify systemic issues (for example if a specific provider or type of service is persistently underperforming in various parts of Wales). It could also help identify common training needs or gaps in service provision. Welsh Government should also consider how best it can use outcomes data to support commissioners and service providers to stick to the principles of the grant, and be stronger in challenging areas where performance is weaker.

How effective is joint working between housing support services and public services such as health and social care.

There are definitely pockets of good practice, where different public services are working well together to provide holistic, person-centred support, however this is not yet routinely embedded in every part of Wales, instead relying upon hard-working individuals who develop positive relationships with other service providers, over and above what is typically expected of them. We are hopeful that the Welsh Government's forthcoming Homelessness Bill will take the opportunity to enact the proposal in their recent white paper, to create new duties upon all public services to identify people experiencing or at risk of homelessness, refer them on the most appropriate services, and cooperate with those services for as long as is needed. We believe that such legislation could help formalise and standardise such good practices, ensuring that they are in place in all parts of Welsh public services for everyone who needs them.

We identified specific challenges to cooperative working between housing support and mental health services in our 2023 report and campaign [Mental Health on Hold](#), and although there have been some improvements to mental health services since then, many of those same barriers faced by people experiencing homelessness persist to this day. Whilst Welsh Government has repeatedly given commitments to overcome this inaccessibility, in their [White Paper on ending homelessness](#) and in their new [mental health and wellbeing strategy](#), we are not yet seeing the fruits of this strategic work at ground level.

A positive example of collaborative working is our National Lottery-funded [Swansea and Neath Port Talbot 360 project](#), which is a multi-agency partnership which sees homelessness, health and substance use experts working together to provide wraparound support for people with the most complex unmet needs. Part of this project includes a small team of occupational therapists, who act as dedicated advocates to signpost clients towards suitable support services as well as activities to boost health and wellbeing. Because these occupational therapists are employees of the local health board, they are able to access specialist services which might otherwise be inaccessible for people we support who live chaotic lives. We believe that this model is something that could also work in other health board areas.

We also have a number of local partnerships with homelessness nursing teams, who are able to join our rough sleeper outreach services to provide immediate healthcare where people are staying, as well as signpost towards more mainstream healthcare services. We

also have a number of large '[welfare vehicles](#)' which operate remotely across all parts of Wales, providing advice and support, as well as washing facilities, first aid and harm reduction supplies. We also partner with health, drug, and alcohol services to support their outreach services, providing remote screening and vaccinations. This is a non-commissioned service, supported by our generous corporate and individual donors, but with long-term sustainable funding this could also be scaled-up to work across Wales.

What services should be commissioned in future to effectively support people with complex needs to find and keep a home.

As outlined in our responses to the previous questions, we would like to see lots more investment in genuinely cross-sector, multidisciplinary services. Welsh Government has said that it believes partnership working will be key to ending homelessness in Wales, however it has fallen to third-sector organisations such as The Wallich to develop many of these partnerships outside of the statutory Housing Support Grant system, through securing alternative external sources of funding. These other sources of funding, such as grant schemes from trusts and foundations, are typically very oversubscribed and therefore less reliable in the longer-term, as a wide range of organisations compete for the same small pots of money. Although this model is great for funding innovative new projects, Welsh Government needs to consider how it can step in to scale up successful ideas that could have a wider impact if replicated across Wales.

Unfortunately, the HSG commissioning system seems to struggle with funding genuine collaboration, as despite recent reforms, it is still seen primarily as a housing fund, which isn't open to non-housing organisations, and the same is also true for other sources of funding within the wider sectors of health and social care, which are not accessible to organisations primarily focused on housing. Welsh Government ought to examine how this narrowly sectoral approach to funding leads public services operating in silos, unable to cooperate effectively. A first step towards this might be to support local authorities and health boards to fund more multi-disciplinary teams, with dedicated specialist health workers sat in housing teams, and vice versa.

The Welsh Government should also consider how to address the overly-competitive nature of the HSG commissioning process, as third sector organisations across the sector would like to be able to work together much more collaboratively towards our shared ambitions of ending homelessness, however at present we are forced to compete with one another to win contracts. Commissioners need to provide appropriate funding and sufficient time for multiple providers to come together to develop consortium bids for contracts. Often the

incentives are to undercut other organisations on price in order to win contracts, however this ultimately has the effect of a race to the bottom, degrading both standards of support and staff pay across the sector.

Above all, the Welsh Government needs to take a more holistic view of the whole HSG sector as it operates across Wales. We are concerned that as well as missing opportunities to collaborate with other public services to support clients who present at multiple different times and places, we also may be duplicating each other's work, confusing clients who don't know where to go to ask for help, and in the worst cases undermining each other in forming trusting relationships with clients. Welsh Government should map out the full range of services on offer to people experiencing homelessness in every different location, understand how they are funded and their reporting structures, and then work to fill the gaps, reduce duplication, and incentivise on-going collaboration, focused on the needs of service users.



Local Government and Housing Committee inquiry into housing for vulnerable people

Written evidence submitted by The Salvation Army, February 2025

1. The Salvation Army is a church and charity which has supported people in need in Wales since 1874. We are now present in 36 communities across the country, and in particular work with local authorities and other stakeholders to provide specialist homelessness and housing support services in Cardiff, Newport, Merthyr Tydfil, and Wrexham.
2. We welcome the opportunity to provide evidence to the Local Government and Housing Committee's inquiry into housing for vulnerable people. Our evidence is grounded in our experience of working with vulnerable people day in, day out.
3. Our evidence follows the order of the inquiry's published terms of reference.

How effectively is the Welsh Government planning for the future of the Housing Support Grant in light of rapid rehousing transition and the forthcoming Homelessness Bill?

4. In October 2021, the Welsh Government published its Rapid Rehousing Transition Plan guidance, with the expectation that local authorities develop and submit their rapid rehousing plans. The guidance states that 'A pre-requisite of Rapid Rehousing is ensuring there are planning arrangements to ensure: (a) enough secure, affordable accommodation available; and (b) enough of the right support available to assist people to secure and sustain settled accommodation'. However, our sense from the work of our Housing First (HF) projects across Wales is that offers of accommodation have remained stagnant.
5. The Rapid Rehousing Transition Plan guidance recommended that assessment of support needs be collected through four categories: low needs, medium needs, high needs, and intensive needs. The Welsh Government provided an excel tool to aid local authorities in capturing and analysing this data. It would be helpful to understand what this data is showing and how it is being used to plan service.
6. We believe that HSG should continue to be a ringfenced funding stream, but while we welcome recent increases in HSG, we believe that it does need to cover actual increased costs, including staffing costs.
7. We hope that the forthcoming Homelessness Bill will further develop our ambition as a nation to make homelessness be rare, brief, and not recurrent.

What are the current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce?

8. While we welcomed the Welsh Government's (WG) decision to increase HSG in its last budget, overall we, like our statutory partners, still find ourselves in the position of having to meet

demand for services which outstrips the resources available to us. We also see levels of complexity of support and risk becoming more challenging within the current staff structures.

9. In particular, in many places funding for Housing First services has remained static for several years. Wales has an exemplary model of HF but the real terms cuts caused by not increasing funding in line with inflation mean that we are not able to provide services as flexibly as we would like to: to cover direct costs we are now having to realign staffing structures with spending, resulting in the loss of jobs and limited service delivery capacity.
10. The Renting Homes Act presents additional challenges for the management of services, for example in limiting our ability to move residents within services for the wellbeing of themselves, other residents, and staff.
11. Working in partnership with Cymorth Cymru and other sector partners, we are trying to develop our workforce, to make homelessness support a more attractive career option and to ensure that the work of our staff is rewarded appropriately. WG has expressed support for the Real Living Wage for social care workers, but with no indication of where the extra cost of this is to come from. The Employers' National Insurance increase has added to this problem - it means in effect that more of the money that we recover from WG and local authorities (LAs) and thus ultimately from the Treasury in London now has to go back to the Treasury. It seems that LAs will be compensated for some or all of this extra cost but third sector organisations like ourselves will not, even though we provide services commissioned by, and therefore on behalf of, LAs.
12. We would like to raise a particular point about our position as a voluntary sector service provider. We have a sense that statutory commissioners have come to see us, and the faith/ third sector more widely, as people who will always step into a gap. We do bring added value to the work that we do but our own resources are not infinite, and we are finding ourselves increasingly stretched. Services have to be properly funded; they cannot rely on providers like ourselves being able to make up deficits from our own resources.

How much is known about service performance, including data on outcomes?

13. Research conducted by Cardiff Metropolitan University in 2020 found that HSG funded services had a positive impact on people's wellbeing and health, with every £1 invested in them delivering £1.40 net savings to public services in Wales.
14. It is often unclear to us how LAs use the HSG data that we return to them. There is no standardised format for reporting HSG outcomes to local authorities, many of whom require several additional reporting functions alongside the HSG bi-annual Outcomes Report. This creates obvious inefficiencies for providers, like us, who work across several authorities; and it misses an important opportunity to understand how HSG is doing. Some LAs just want hard outcomes, some want a blend of hard and qualitative data, and others require data on hours spent with each service users. This final approach is particularly challenging as it is heavily time consuming and really does not represent the quality and variety in work conducted with vulnerable people
15. We therefore call for the introduction of single HSG reporting model across all LAs, with a commitment to reduce the amount of additional/complimentary/LA specific data reporting requested. The model should include, ad a minimum, person-focussed stories about outcome, and better knowledge about what services are doing and how well they are doing it. The new HSG

Outcomes Framework is supposed to deliver some of these things but not all LAs have adopted it as their sole reporting function yet.

How effective is joint working between housing support services and public services such as health and social care?

16. We can demonstrate examples of effective joint working with public services at 'ground level'. However, at present all statutory and public services- including criminal justice, health and housing- are stretched and under resourced. This has implications for the ability of all of us to work effectively together, especially at a more strategic level, because effective joint working requires an investment of time and resources.
17. The 2023 Homelessness White Paper proposed an enhanced case coordination approach, and a designated lead to ensure that people facing multiple disadvantage can expect a good level of communication and cooperation, regardless of the area in which they access services. This should be taken forward. A greater emphasis on co-funding and co-commissioning of services- robustly supported by the Welsh Government- WG level- could provide a greater impetus to make it work

What services should be commissioned in future to effectively support people with complex needs to find and keep a home?

18. It is common ground that there needs to be a range of services to support people with a range of needs. However, we would specifically like to raise the question of the need for permanent supported housing for some people- beyond the older people/ people with learning difficulties/ people with mental health problems who are, we believe, covered by the existing permanent supported category within HSG.
19. We find this need particularly in Housing First work. Some LAs are asking us why people who have been receiving HF support for some years are not dropping down to lower levels of support, or indeed ceasing to require support altogether. However, we work with people in HF who could quite easily revert to a chaotic lifestyle without access to regular, relational, long term support. For a person who has endured perhaps 30 years of chaotic living related to complex needs, even 7 years of HF support will only take them some way to stability and greater independence.
20. We have to accept that there (and always have been) some people who may *never* be able to live without support. As one of our senior managers put it, in Housing First 'We aren't asking people to *change*, we're asking them to *function within society*'. Even being able to undertake tasks such as putting out rubbish bins for collection on the right day may be a considerable achievement- but one which requires regular input of support to maintain.
21. The Committee might therefore like to explore a further distinction between Housing First and Rapid Rehousing. Both are housing-led approaches and they are often thought to be more or less synonymous, but we would suggest that they might be distinguished in terms of what they do, who they are for, and the directions that they lead into:
 - Rapid Rehousing is good for people who need to be got *out of* the homelessness system as quickly as possible- for example, people whose main problem is the lack of a home and who could fairly soon return to living largely independently- and for people with low to medium needs in which tenancy support could be appropriate.

- Housing First is housing-led provision for vulnerable people who need ongoing support to enable them to function within society and achieve a degree of stability: this support will be required for a longer period and possibly for life.

Conclusion

22. Wales has a proud tradition of innovation in housing and support services for vulnerable people. While we recognise that both WG and LAs operate under funding pressures, we hope that this tradition can be maintained. It is essential that legislation and initiatives such as the 2023 White Paper, the Renting Homes Act, rapid rehousing, Housing First, and the forthcoming Homelessness Bill, are aligned to complement and reinforce each other.
23. The Salvation Army remains committed to playing its part in this tradition, and to working with vulnerable people in Wales who are in need of housing and support as we have done for the past 150 years.
24. But in order to do this work properly, we need to have sufficient and supportive structures and resources.

Response to request for written Evidence – Goleudy Housing and Support Limited

Please find below Goleudy's responses to the questions posed as part of the Welsh Parliament's Local Government and Housing Committee's inquiry into Housing for Vulnerable People.

How effectively is the Welsh Government planning for the future of HSG in light of the rapid rehousing transition and the forthcoming Homelessness Bill?

Much of the White Paper's content was welcome and refreshing. The much-talked-of introduction of 'Housing First' and 'Rapid Rehousing' approaches is particularly welcome. However, these have now been discussed rather than actioned for many years. These need to be hard-wired into commissioning and matched with the provision of much-needed accommodation. We would question the extent to which local authorities (LAs) have been given sufficient guidance and 'push' by the Welsh Government (WG) to review their HSG strategies and commissioning plans to transition the focus of support onto Rapid Rehousing services. Maybe there should be targets/milestones agreed upon between WG and LAs to increase the proportion of HSG spent on supporting people in their own homes and reduce the proportion spent on 24/7 and other shared supported housing. This can only happen when accompanied by more social/affordable housing and WG issuing allocations guidance that prioritises homeless people moving rapidly into social and PRS housing ahead of others.

Current and anticipated pressures in delivering HSG-funded support services, including pressures on the workforce.

The delivery of HSG-funded support services remains under significant pressure. Financially, the impact of rising costs and the welcome move towards implementing the Real Living Wage means that project salary costs have increased substantially over recent years. Staff costs will increase again with the increase in National Insurance from April 2025. The Welsh Government's pledge to increase HSG is vital to ensuring ongoing sustainability, though the services remain precarious. Operationally, attracting and retaining staff in the support sector is an ongoing challenge, with relatively low wages and rightly high expectations of the services' quality. We expect a significant commitment from staff. This can lead to high turnover and lost knowledge. In addition, the legislative burden associated with running support services, particularly those involved with accommodation, has increased substantially over recent years. For providers of housing-related support services, the Renting Homes Wales Act requirements have brought significant additional risk and cost to the sector. The Housing Support Grant is due to increase by £21 million in 25/26 - this is welcome, although it is unclear whether most of this will be spent on the NI changes and CPI/RPI wage increases. With the consistent increases in homelessness, further funding increases will be needed to stem the flow of new people becoming homeless. We need a more significant push on prevention (without jeopardising emergency provision in the short-medium term), which will require real increases in funding in the next few years.

How much is known about service performance, including data on outcomes;

Analysing 'distance travelled' data at a population level is particularly challenging. The analysis of the IAPT system across England demonstrates this. To gain more insight into the real

difference made by services (at a population level), it would make sense to revise the outcomes framework to be less subjective, only consider service users' perceptions (not the support worker), and have a universal IT/recording system across the sector.

How effective is joint working between housing support services and public services such as health and social care and

Goleudy's experience of engagement with health and social care is good. One local authority has a good example of a purposely established multi-agency team— six nurses, one social worker, counsellors, substance misuse specialists, and mental health specialists. They work with homeless people, and it seems to work well. Could this joint working multi-agency model be replicated across Wales?

It is the case that services report that statutory agencies will relinquish responsibility for extremely vulnerable adults, leaving Goleudy with the choice of accepting someone into a service that cannot truly meet their needs or leaving them homeless. In these circumstances, we always help people, even if there is a disproportionate cost to us.

A welcome development would be jointly commissioned services, where the third sector and health services could more effectively address homeless people's psychological and medical needs. Joint working could be improved, e.g., by introducing more formal mechanisms for discussing people whose needs aren't being met. There are statutory multi-agency meetings for certain groups of people (e.g., MAPPA)—we should explore setting up statutory meetings regarding homeless people when they reach certain crisis-level situations.

Several Goleudy services feature joint work with Probation. Sometimes, they are under substantial staffing pressures, have high caseloads, and have high staff turnover, which can challenge joint work.

Many people still seem to be leaving prison without anywhere to live. They often go straight into temporary accommodation. Joint working with prisons and RSLs/Housing Options could be improved to help ex-offenders move into 'Rapid Rehousing' (with multi-agency support) straight from leaving prison (or very quickly after leaving prison). This could reduce demand for temporary accommodation and help prevent future homelessness amongst many ex-offenders. However, a multi-agency approach is needed involving the third sector, substance misuse services, job centres/training, probation, etc.

What services should be commissioned to effectively support people with complex needs in finding and keeping a home?

As alluded to in our previous answers, this segment of the client group would be more effectively served by:

- Joint health and housing-related support projects
- Links to capital funding for purpose-built housing
- Realistic commissioning and funding
- Multi-agency working that is pragmatic and led by the front-line workers
- Significant consultation with service users
- Services that have the commitment of multi-agency partners at the commissioning/ tendering stage - so that the wrap-around support is in place from day one of the service

- Services that have access to funds to open up opportunities to move into the PRS (e.g. by paying the LHA top-ups)
- Support that can be more open-ended - i.e. based on what people need, not on set timescales for withdrawing support, like 'Housing First', where support can continue for as long as required
- Services that include elements of 'purposeful activity' such as offering proper help for people to train, volunteer, learn workplace social skills and coping skills, and find work. There could be a need to help people navigate good relationships - very hard to do, but many people struggle to have good, safe, trusting and kind relationships.

The housing support community may need to accept that some people with very complex needs will find it too difficult to live alone and will need a supported environment. These people may have 'higher' needs than 'Housing First' or Rapid Rehousing and may require a mix of care and support.

Housing support for vulnerable people

Local Government and Housing Committee inquiry

A response by Cymorth Cymru
February 2025

About Cymorth Cymru:

Cymorth Cymru is the representative body for providers of homelessness, housing and support services in Wales. We act as the voice of the sector, influencing the development and implementation of policy, legislation and practice that affects our members and the people they support.

Our members provide a wide range of services that support people to overcome tough times, rebuild their confidence and live independently in their own homes. This includes people experiencing or at risk of homelessness, young people and care leavers, older people, people fleeing violence against women, domestic abuse or sexual violence, people living with a learning disability, people experiencing mental health problems, people with substance misuse issues and many more.

We want to be part of a social movement that ends homelessness and creates a Wales where everyone can live safely and independently in their own homes and thrive in their communities. We are committed to working with people who use services, our members and partners to effect change. We believe that together, we can have a greater impact on people's lives.

Website: www.cymorthcymru.org.uk

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1. How effectively the Welsh Government is planning for the future of the Housing Support Grant in light of rapid rehousing transition and the forthcoming Homelessness Bill

1.1. Housing support services are critical to the delivery of both rapid rehousing and the forthcoming Homelessness Bill. In this section of our evidence, we have outlined the journey that the Welsh Government has taken in recent years to improve the join up between capital development and homelessness policy. While there is still much more to be done to achieve our collective ambitions to end homelessness, the context of the last few years is important to understand where we are on this journey.

Response to pandemic: Start of transformation

1.2. Over the last few years, the Welsh Government's housing policy team has made a concerted effort to encourage join-up between the capital development and homelessness policy teams, at a national and local level, to try and ensure that the development and allocation of housing is better aligned with the needs of people experiencing or at risk of homelessness.

1.3. During the early months of the pandemic, we worked with the Welsh Government and local authorities to track housing and support needs, as the 'everyone in' approach continued to see large numbers of people present to local authorities. While the initial £10m emergency funding was critical to the sector's initial response to the pandemic, it became clear very quickly that government and its partners would need to consider how people in temporary accommodation would be able to access a settled home. The number of people in temporary accommodation was growing, and the shortage of housing supply was a huge concern.

1.4. The Welsh Government's housing directorate worked closely with local government and other partners such as Cymorth to develop the next stage of their response to the pandemic, which became known as 'Phase 2'. In May 2020, the Minister for Housing and Local Government [announced](#) that funding would be available to support local authorities and their partners to transform homelessness services and develop permanent accommodation meet the needs of people in temporary accommodation. Initially, the Welsh Government announced that there would be £20m in revenue and capital funding, but the applications from local authorities significantly exceeded this amount, leading to a [revised](#) funding allocation of £40m in capital funding and £10m in revenue funding.

1.5. We were heavily involved in drafting the guidance that accompanied this funding, with careful consideration given to the vulnerabilities and support needs of people in temporary accommodation, and the need to take a trauma-informed approach. It was also influenced by the recommendations of the [Homelessness Action Group](#), and was the first step in moving Wales towards rapid rehousing. The guidance outlined four key areas of focus:

- **Support:** Continue to support people who remain sleeping rough, everyone in emergency provision and those newly presenting - prioritising rapid move on through appropriate cohorting to address and prioritise different support needs.
- **Plan:** Prepare clear transition plans for services and provision setting out how they will move towards providing more sustainable models of accommodation and support that meets the needs of everyone currently in emergency provision and future presentations.
- **Build:** Innovate, remodel, procure and build accommodation to improve the quality of emergency provision and increase the availability of permanent and semi-permanent move-on and supported accommodation.
- **Transform:** Commit to and plan how to rapidly move away from the use of night shelters and 'floor space'. Rather, we must urgently prioritise better quality emergency provision

which quickly supports people back into permanent housing, allowing street services to prioritise professional assertive outreach focused on resolving homelessness.

- 1.6. The capital development team and homelessness policy teams within the Welsh Government's housing directorate worked incredibly closely to develop and deliver this approach. There was a clear effort to ensure that there was a more joined-up approach within the Welsh Government, and an expectation that this should be replicated at local government level in the development of their Phase 2 plans.
- 1.7. Although the scale of the challenge was undeniable, it was very positive to see this commitment to overcoming the silos of the past.

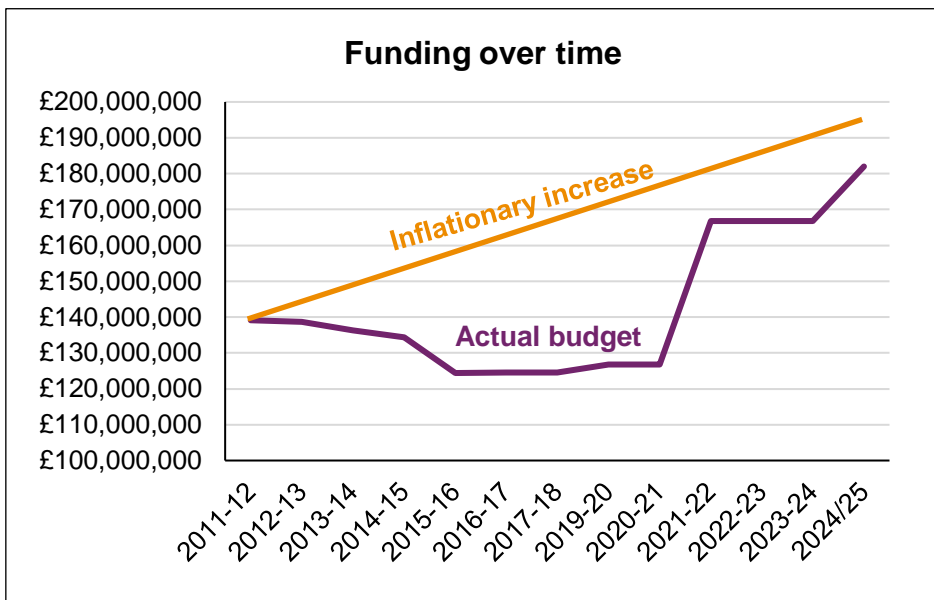
The move to rapid rehousing

- 1.8. Rapid rehousing is focused on moving people into a settled home as quickly as possible, and critical to this ambition is building more social homes and allocating existing social homes to people exiting homelessness. However, ensuring that people have the right support wrapped around them is critical to helping them to maintain their tenancy and avoid repeat homelessness.
- 1.9. One of the key elements of rapid rehousing, as outlined in Welsh Government [guidance](#), is that *'people are able to access high quality, multi-agency support, tailored to individual needs, where this is required'*. Social landlords have also been clear that an increase in housing support services is vital to giving them the confidence they need to allocate housing to people who have been through the homelessness system and may have experience of trauma and additional support needs.
- 1.10. In October 2021, the Welsh Government published its Rapid Rehousing Transition Plan guidance, with the expectation that local authorities develop and submit their rapid rehousing plans. The [guidance](#) states that *'A pre-requisite of Rapid Rehousing is ensuring there are planning arrangements to ensure: (a) enough secure, affordable accommodation available; and (b) enough of the right support available to assist people to secure and sustain settled accommodation'*. It goes on to say that reliable and comprehensive data is vital to achieving this.
- 1.11. One of the key parts of the rapid rehousing transition plan guidance is the assessment of support needs, and it recommends that this is broken down into four categories: low needs, medium needs, high needs, and intensive needs. The Welsh Government provided an excel tool to aid local authorities in capturing and analysing this data.
- 1.12. This data is key to understanding the support needs of people in Wales, and while it is positive to see this data being collected, there is further work to do to ensure that it is influencing local development and national decision making.

Housing Support Grant funding

- 1.13. The impact of austerity and public funding constraints over the last 15 years have had a huge impact on the homelessness and housing support sector, and therefore their ability to support the transformation outlined above and plan for the future.
- 1.14. Over the last decade, funding for the Housing Support Grant (and its predecessor the Supporting People Programme) has not kept pace with inflation or demand.
- 1.15. In 2011/12 the Supporting People Programme budget was £139m, but faced significant cuts over the following years, falling to £124m in 2015/16 and remaining at this level until 2020/21. In 2021/22 it was increased by £40m in recognition of the significant pressures on homelessness services following the pandemic. The budget remained at this level until 2024/25, when it was increased by another £13m in recognition of the impact of funding constraints on frontline worker wages.

1.16. When [inflation](#) is taken into account, the £139m budget in 2012 would equate to £196m in December 2024. The current budget for the Housing Support Grant in 2024/25 is £182m.



- 1.17. While the HSG budget increases in 2021 and 2024 have been warmly welcomed, this does not reflect a real term increase to services. In addition, the demand and complexity facing services has increased significantly over the last few years, indicating that even an inflationary uplift would fall short of what is required.
- 1.18. While the housing ministers in recent years have listened to the sector and secured additional funding, it continues to feel as though there is a battle for the HSG every single year, rather than a strategic plan to increase the funding to meet need, now and in the future.
- 1.19. Improving data to ensure that there is a better understanding of need, and providing multi-year budget settlements, would enable local authorities and support providers to plan ahead, enable stability and ensure that people get the support they need.
- 1.20. It is also essential that this grant remains ring-fenced. There is significant evidence from England that shows that homelessness and housing support services were decimated when the ring-fence was removed there. A [report](#) from the National Audit Office in 2014 highlighted average spending reductions on these services in England of 45.3% between 2010/11 and 2014/15. Homeless Link reported that in some areas, some areas, funding for homelessness services has been cut by as much as 80%.

Homelessness Bill

1.21. The Expert Review Panel, which was established to make recommendations on legislative reform to the Welsh Government, was very clear that housing support services were critical to the successful delivery of many of the reforms.

“The panel acknowledges that bringing forward the recommended reforms will take time, investment in our housing supply and support services, as well as drive and commitment.”

“Throughout the past year, the panel has heard concerns from all corners that our homelessness support services are under unprecedented pressure and that the social housing supply across Wales falls far short of matching demand. Although changes to the law certainly set clear baseline standards, these standards will not be consistently met without sufficient investment in the required resources, including revenue funding for support services, staffing capacity, and housing supply.”

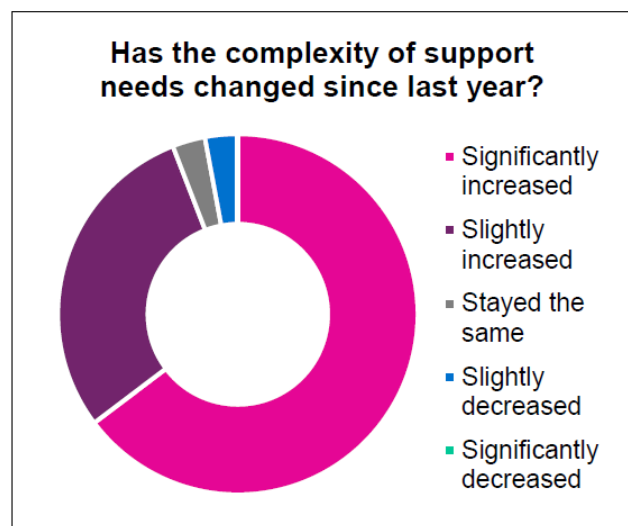
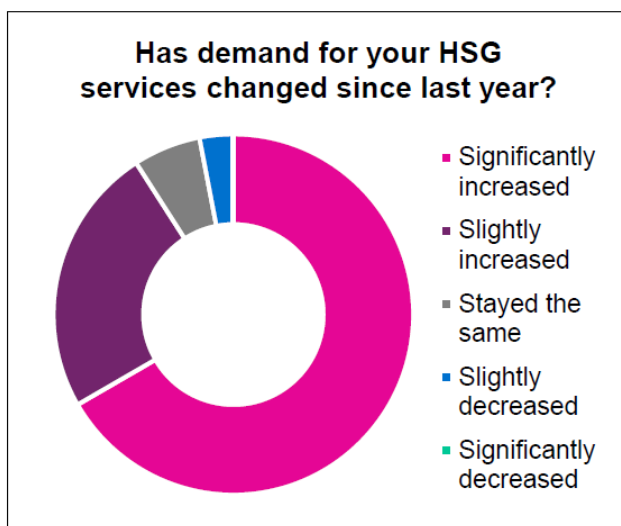
1.22. This was a view shared by multiple stakeholders, including support providers, social landlords and local authorities. We believe it is essential that the White Paper proposals become law if we are to achieve the ambition of making homelessness rare, brief and unrepeated. However, increasing the provision of housing support services is critical to supporting these proposals, and giving local authorities and other key partners the confidence to embrace the reforms.

Summary

- 1.23. In order to effectively plan for the future of the Housing Support Grant we recommend that:
- The Welsh Government should provide a multi-year funding settlement for the Housing Support Grant, so that local authorities and providers can plan for the medium term.
 - The Welsh Government should ensure that the Housing Support Grant remains ring-fenced.
 - Local authorities should continue to collect and analyse data on support needs, to inform local planning of housing supply, allocations and support provision.
 - The Welsh Government should better utilise data to inform increases to the Housing Support Grant to meet needs nationally.
 - There should be continued efforts to ensure that housing supply and homelessness teams, at a national and local level, continue to work together to improve join-up between housing supply and homelessness need.

2. Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce

- 2.1. The pressure on the homelessness and housing support system has never been greater. Welsh Government statistics show that 11,466 people were in temporary accommodation on 30 November 2024. Many of these people will need support to help them cope in temporary accommodation and then move into a settled home. Housing support services are also playing a key role in preventing even more people from entering temporary accommodation.
- 2.2. Evidence we have collected from support providers demonstrates that demand for homelessness and housing support services has increased over the last year, as well as the complexity of people’s support needs.
- 91% said demand for their services had increased since last year
 - 94% said the complexity of support needs had increased since last year



2.3. The increasing complexity and risk being reported by housing support services is of significant concerns. Here are some descriptions from services about how this is taking effect:

“Increased incidents involving alcohol. Increased incidents involving mental health. Increased incidents of suicide attempts. Increased incidents involving violence.”

“Recently 62% of residents have experienced suicide ideation and have attempted suicide and/or are self-harming in response to the trauma they have experienced. For some, this is coupled with substance usage, chaotic lifestyles and no support networks.”

“Staff in services are dealing with significant issues. Within the last quarter, staff have had to deal with suicide attempts, self-harm, violent crime.”

“We are working with far more young people and women with significantly higher mental health needs, including serious self-harm and suicide ideation. For the first time ever, we are seeing many young people we support threaten staff with weapons and are carrying weapons.”

2.4. This is happening at a much greater frequency and at a much larger scale over recent years and is causing significant concerns for support providers, who are trying to support and safeguard both people using services and staff members.

Impact of increased complexity on staff wellbeing

2.5. We have become increasingly aware of the impact of increased demand and complexity, coupled with restricted funding and job uncertainty, on staff health and wellbeing.

2.6. 91% of providers who responded to our survey said there had been a negative impact on staff wellbeing, sickness and burnout, with 41% saying this had been extremely negative. Many provided further detail about how this was affecting staff, with some hugely concerning comments about staff mental health.

“I have sadly lost a staff member through suicide, I have also had more significantly more staff off work for long periods citing stress, anxiety and compassion fatigue/ burn out.”

“Staff are tired. One member of staff recently said ‘it shouldn’t be this hard to help people’ and that’s how it feels. Everything is a challenge due to shrinkage of services.”

“Higher staff turnover, shorter tenure in role. Increased staff sickness absence due to work related stress and anxiety.”

“We believe staff wellbeing has been negatively impacted by increased complexity. We have seen higher numbers of staff leaving than previous years. Further to this, numbers of staff referrals to our counselling services have doubled.”

“We have a high staff sickness rate with the majority of cases being stress-related.”

Impact of low wages on frontline workers

2.7. The homelessness and housing support workforce does incredibly complex work in extremely challenging circumstances, supporting people with experience of trauma, domestic abuse, exploitation, mental health and substance use problems, helping them to navigate complex housing and welfare systems and legislation, and often being the one person that they can rely on. However, these workers have been severely under-valued, have not received the recognition, respect and reward they deserve, with funding constraints driving down wages to appallingly low levels.

2.8. In January 2023 we surveyed over 600 frontline homelessness and housing support workers about the impact of the cost-of-living crisis on their lives.

- 86% said they were not putting on the heating in order to save money
- 56% were struggling to pay bills

- 18% were struggling to pay their rent
- 12% were feeling at greater risk of homelessness

2.9. In December 2023 we collected evidence from homelessness and housing support services about the wage levels in the sector. The evidence indicated that:

- 41% were being paid below the upcoming National Minimum Wage (due to come into force in April 2024)
- 67% were being paid below the Real Living Wage

2.10. This is unacceptable, given the hugely important, complex and often life-saving work that these support staff undertake on a daily basis.

2.11. It is important to point out that support providers would like to pay support workers a much higher wage, but funding constraints and commissioning processes have driven down wages over the years.

Impact of staff turnover

2.12. The increasing pressures on services, combined with low pay, have a negative impact on recruitment and retention, which has an impact on remaining staff members and the quality of service provided to people.

2.13. In our survey of support providers in October, 50% of respondents said there had been an increase in staff turnover over the last year. Of those who said that turnover had stayed the same, several wanted to highlight that turnover had increased significantly in previous years and still remained very high.

2.14. Support providers were keen to outline how high staff turnover affects people using services, who have often experienced a lifetime of trauma and system failure.

“It has had significant impact - support is based on relationships and staff turnover directly negatively impacts the person we support through having to repeat stories and build trust over and over again.”

“The people we support rightly complain about not seeing the same people delivering support when we have to use agency. This inevitably makes it hard for them to build positive relationships, feel safe and achieve their outcomes.”

“Staff shortages are significantly burning out the rest of the team. Therefore when one person is off long term sick we often find other staff are impacted and more sickness occurs. It is a constant strain and battle.”

Journey towards higher pay

2.15. We campaigned strongly on the issue of frontline worker pay in the lead up to the Welsh Government’s Final Budget for 2024/25 and were successful in securing an uplift of £13m for the Housing Support Grant. We were also extremely pleased that the Minister for Climate Change [wrote](#) to local authorities and directed them to utilise this uplift to increase frontline staff wages.

“This increase equates to a c7.8% increase on ‘core’ HSG funding of £166,763,000 and I have allocated this additional funding with the very clear expectation that this should be used to address pay pressures in the first instance, and assist commissioners in supporting providers to deliver on our broader commitment to Fair Work and the Real Living Wage.”

2.16. The Welsh Government and Cymorth recognised that the £13m uplift would not be enough to ensure that all workers could be paid the Real Living Wage (RLW), however it was an important first step, and one that needed to be built on in subsequent years.

- 2.17. In a survey of support providers conducted in October 2024, 91% reported that they were paying the RLW, however 79% were not receiving the funding required and were therefore having to subsidise the RLW with income from other sources.
- 2.18. The Welsh Government's Draft Budget for 2025/26 included a £21m uplift for the Housing Support Grant, which is hugely welcomed by the sector. Ministers have specified that this allocated to 'assist commissioners to support the sector in meeting increased costs, such as paying the Real Living Wage and to assist in meeting increased demand and complexity'.
- 2.19. However, the UK Government's Autumn Statement has caused huge concern for the sector, as changes to employer National Insurance contributions threaten to swallow up most of the increase in the HSG. Data collected from 22 HSG providers in early December suggested that on average, they would need an increase of 8.8% to cover the additional NI costs. The highest figure quoted was £621,000 and the average estimated cost was £120,162 per support provider.
- 2.20. We fear that the UK Government's decision to increase employer NI costs will severely impact the positive action taken by the Welsh Government to try and increase sector pay. It is incredibly frustrating, as this workforce deserves higher pay, and our efforts to make progress towards this aim are being hampered by the UK Government.

Developing a resilient and valued workforce

- 2.21. The Welsh Government's Ending Homelessness [Action Plan](#) includes a commitment to developing a resilient and valued workforce, and the Ending Homelessness National Advisory Board has established a task and finish group to support the delivery of this ambition. This group has been developing recommendations relating to pay, support for staff, training and qualifications, and commissioning, with plans to present these to the Ending Homelessness National Advisory Board over the coming months.
- 2.22. Although the recommendations are still being developed, these are likely to include:
- Staff need to be paid a higher wage, that recognises the skill and complexity of this work.
 - Staff need to receive support for ongoing vicarious trauma and traumatic events.
 - Reflective practice needs to be embedded into services, to support service improvement and resilience within the workforce.
 - High quality training needs to be provided to ensure that workers have the knowledge and skills to meet the increasing complexity within services.
 - Commissioning processes and practices need to ensure that contract values include the appropriate funding and requirements to embed fair pay, psychological support for staff, reflective practice and training.
 - The Welsh Government needs to ensure that their guidance and funding allocation enables the deliver of the above recommendations.
- 2.23. Once the recommendations are agreed by the Ending Homelessness National Advisory Board, Welsh Ministers must respond positively if it is to have any hope of delivering the Ending Homelessness Action Plan commitment to a resilient and valued workforce.

3. How much is known about service performance, including data on outcomes

- 3.1. The impact of homelessness and housing support services has been well evidenced over the years, with numerous pieces of research demonstrating the impact of the Housing Support Grant or the Supporting People Programme (as it was formerly known) both in Wales and in other parts of the UK.

- 3.2. A Carmarthenshire Council study some time ago reported that every £1 invested in Supporting People delivered a saving of £2.30. Research on the Supporting People Programme in Northern Ireland around a decade ago found that every £1 spent on the SP services saves the public purse £1.90.
- 3.3. The most recent research was conducted by Cardiff Metropolitan University in 2020. This [research](#) found that every £1 invested in HSG services delivers £1.40 net savings to public services in Wales. At the time, the HSG was £124m per year and the research cited gross savings to public services of £300m. Based on the current £182m Housing Support Grant budget, this translates to a total gross saving of £442m, with £204m to the health service, £177m to social care services and £70m to criminal justice services.
- 3.4. The research also found that services had a positive impact on people's wellbeing:
 - 80 per cent of respondents reported a sustained positive impact in relation to feeling in control of their lives
 - 79 per cent reported a sustained positive impact in relation to their life satisfaction
 - 70 per cent reported a sustained positive impact regarding their optimism for the future
 - 67 per cent reported a sustained positive impact on their health.
- 3.5. In January 2023, the Welsh Government published a new Housing Support Grant Outcomes [Framework](#). This had been developed in partnership with the sector, through a task and finish group, which had representation from both local authority commissioners and support providers. In addition, we conducted extensive engagement with frontline homelessness and housing support workers through the Frontline Network Wales. This occurred at the start of the task and finish group's work, resulting in a paper to the task and finish group, influencing the development of the new framework.
- 3.6. One example of how the framework was influenced by frontline workers was the inclusion of an outcome relating to people having independence and control, something that wasn't previously collected. This represents a lot of the early work that support workers undertake with people who need support, and is critical to them being able to manage a tenancy in future. They also influenced the meaningful activity outcome, and the structure of the health-related outcomes.
- 3.7. The outcomes data has been collected by support providers and local authorities, but is yet to be published by the Welsh Government.
- 3.8. A key point that we would like to make on behalf of frontline workers is that it is important that the delivery of support is not negatively affected by the need to collect data. We often hear from both frontline workers and managers that a huge amount of information is required from support providers, including but not limited to monitoring data and outcomes data. It is important that this is proportionate and does not become so burdensome that frontline workers do not have the time to focus on the delivery of support. It is also important to consider the impact of data collection on people using services, who are often asked numerous questions by a wide range of services, which can feel overwhelming and invasive.

4. How effective is joint working between housing support services and public services such as health and social care

- 4.1. We want to start this section of our evidence by acknowledging the severe pressure that all public services in Wales are under, particularly since the pandemic. We understand that many services are struggling to meet the demand they are facing, and that staff members are overstretched and many are experiencing burn out. Our comments about the lack of join-up are not aimed at individuals, but at a system that needs to work more effectively.

- 4.2. Although there are some examples of good partnership working, the view from the homelessness and housing support sector is that this is often based on individual efforts and relationships, rather than being hard-wired into the system.

Compassion, empathy and stigma

- 4.3. There continues to be issues with the lack of compassion and empathy shown towards people with experience of homelessness, with stigma playing a part in how people are treated and trauma informed approaches not being as embedded as we would like. This can be evident in interactions between services and people, as well as in the policies that can act as barriers to people getting the help they need. It is commonly accepted that people experiencing homelessness can find it difficult to respond to communication and attend appointments, due to trauma and having no fixed address and/or means of communication. However, we continue to hear of examples where people are removed from services due to missing appointments or not responding to letters. Increased flexibility and understanding of the challenges people face, alongside a trauma informed approach, is required to ensure that people are not shut out of services.

Respect and support for the housing support workforce

- 4.4. Support workers tell us time and time again that they do not receive the respect they deserve from other services, particularly those in the statutory sector. They possess a high amount of knowledge and expertise about the person they are supporting, and often spend more time with them than any other professional. However, too often they feel that their opinions are not listened to or treated seriously when they are trying to advocate for someone to receive treatment, care or support from other services.
- 4.5. In addition, they often feel that support workers are left to cope with a multitude of issues, as over-stretched statutory services do not intervene and assume that housing related support services will provide the safety net for the person they support. As outlined above, support workers are highly skilled and so extraordinary jobs, but they should be expected to take the place of statutory health, social care or criminal justice services.

Information sharing

- 4.6. A concern raised by multiple services was that inadequate information sharing between services was increasing the risk facing homelessness and housing support services. They felt that key information was sometimes missing from referral forms and risk assessments, resulting in projects being unable to prepare to meet the complexity or risk associated with the person being referred into their service. Some services commented that this could be due to the high caseloads facing statutory services and the lack of face-to-face appointments since the pandemic, meaning that the necessary information was not being gathered. Others felt that information was not being shared to increase the likelihood of the person being accepted into a service. The consequences of not knowing this information could be severe, with risks to both other tenants and staff members.

Mental health services

- 4.7. We often hear from support providers that mental health services are not as responsive as they should be to people who are experiencing or at risk of homelessness. This can hinder the prevention of homelessness, when housing providers identify an issue but cannot get the appropriate response from mental health services, leading to further deterioration in the person's health and an increased risk of becoming homeless. It can also apply when people are in a crisis, but do not get the response they need. We spoke to frontline workers and managers in preparation for our response to the Welsh Government's draft mental health

strategy consultation and heard several accounts of people who were in acute crisis but sent home from accident and emergency departments with advice leaflets and told to make an appointment with their GP. Others felt that secondary mental health services were not responsive enough when people experienced a deterioration in their mental health. We commonly hear that people who have substance use issues are turned away from mental health services and told to deal with their addiction first.

Social care

- 4.8. Our members have also reported concerns with the response from social care when the person they are supporting has care and support needs that go beyond housing-related support. This can occur when people have very poor health as a result of their experiences of being on the streets, or have traumatic brain injuries as a result of alcohol use, but are not accepted by social care departments. Sometimes they are told that they do not meet the social care threshold. Others are told that they are 'too complex' and that traditional social care services are unable to meet their needs. The long-term health impacts of homelessness and addiction are well evidenced, but it appears that the social care system is not particularly well resourced or set up to meet these needs.

Police

- 4.9. In the last year, we have received an increasing number of concerns about the role of the police in helping homelessness and housing support services to deal with challenges that put other tenants and staff at risk. The Right Care, Right Person policy, enacted by the UK Government in summer 2023, appears to be resulting in the police not responding as they used to, when there are incidents within homelessness and housing related support services. This has left numerous projects feeling that they have been left to deal with challenging and often dangerous incidents on their own, without the necessary support from the police.

Good practice and enablers

- 4.10. There are some very good examples of multi-disciplinary teams emerging in some parts of Wales, where local authority colleagues work alongside third sector and a range of health practitioners. This often takes the form of multi-disciplinary outreach to people on the streets, in temporary accommodation, supported accommodation and Housing First.
- 4.11. This has two key benefits: Taking health care directly to people means they do not face the traditional barriers to accessing services. Their health can be assessed and interventions can be delivered without delay, resulting in an immediate positive impact. Secondly, the presence of health practitioners, who understand how the health system works and are taken seriously by health colleagues, can facilitate access to other health services, such as secondary care.
- 4.12. One example of this is the [Cardiff and Vale Health Inclusion Service](#) (CAVHIS), which provides access to public health screening and short-term support for people who find it difficult to access healthcare and who are not registered with a GP. It has a specialist homeless services, which includes:
- Specialist homeless nurses provide a Monday to Friday, open access clinic based over two sites: medical rooms at the Housing Options Centre and at the Hayes Place Single Assessment Centre.
 - Outreach service for hostels and rough sleepers which has health input from one of the specialist homeless nurses.
 - GP support from CAVHIS provides one drop-in session a week at the Housing Options Centre or Hayes place for those homeless individuals new to Cardiff who are not yet registered with a GP.

- 4.13. In addition, people in the homelessness sector have spoken very highly of the outreach team in Cwm Taf Morgannwg, where Welsh Government complex needs funding has been utilised by the Area Planning Board and local authority housing team to deliver multi-disciplinary outreach to people experiencing homelessness and people living in supported accommodation or Housing First tenancies. The partnership approach and combined funding across health and housing has enabled people to receive rapid access to specialist trauma, mental health and substance use practitioners, who have also help people to access further services within the health system. The team has grown from a handful of people to a team of fifteen, reaching people previously marginalised and excluded by services, having a positive impact on their mental health.
- 4.14. We strongly advocate for this type of multi-agency approach, particularly where there is both national strategic support and funding, combined with regionally or locally led approaches and funding to meet the needs of marginalised groups. The complex needs funding has been particularly helpful, as it has been provided by the Welsh Government's health directorate, working in partnership with the housing policy team. This has encouraged and enabled partnership working between health and homelessness and we therefore hope this funding continues well into the future, and that strategic partnerships between health and homelessness at a national, regional and local level endure.

Legislative proposals for ending homelessness

- 4.15. We fully support the proposals in the Welsh Government's White Paper on Ending Homelessness, which seek to encourage wider public services to play an active role in preventing and alleviating homelessness.
- 4.16. One of the proposals is to place duties on wider public bodies to identify, act and refer if someone is experiencing or at risk of homelessness. While this has obvious benefits with regards to housing, earlier intervention and the prevention of homelessness will also improve health, wellbeing and other outcomes.
- 4.17. Another recommendation the Ending Homelessness White Paper is the proposal for case coordination when someone is in contact with several public services. This would address current frustrations with duplication of work or people not receiving the right support at all. Our members routinely support people experiencing multiple disadvantage, who often require access to more than one public service. There are some great examples of different public services working collaboratively to provide the best outcome for people experiencing homelessness, but these approaches are often driven by passionate individuals and are not systemic. Unfortunately, not everyone who enters the homelessness system is guaranteed this coordinated response. The White Paper proposal for an enhanced case coordination approach and a designated lead should ensure that people facing multiple disadvantage can expect a good level of communication and cooperation, regardless of the area in which they access services.
- 4.18. The resulting Homelessness Bill is due to be tabled in the coming months, and it is essential that the above proposals form part of the new legislation.

5. What services should be commissioned in future to effectively support people with complex needs to find and keep a home

- 5.1. As described above, there has been significant increases in demand for services and complexity of support needs over the last few years. Homelessness and housing support services are continuing to do an incredible job, delivering life changing and life-saving support to tens of thousands of people every year.

- 5.2. The traditional models of provision, namely floating tenancy support and supported accommodation, continue to work very well for the majority of people. However, we believe that further consideration needs to be given to how we can meet the growing complexity and risk that is facing services.

Staffing ratios, flexibility and training

- 5.3. Many services have told us that their staff are skilled and capable of supporting people with multiple disadvantage and complex support needs, but the increase in the volume of people requiring more intense support means that historical staffing ratios are inadequate. One of the ways that services can be supported to manage complexity and risk is by having a higher number of staff working within projects. This applies to supported accommodation settings and floating support, where staff are increasingly having to double up for visits due to the risks of delivering support on their own.
- 5.4. Frontline workers have told us that high caseloads are also having an impact on their ability to meet the needs of people who are experiencing a crisis or presenting with complex, co-occurring support needs. The solution, as with staffing ratios, comes down to increasing funding to enable services to be more resilient.
- 5.5. Some services told us that increased flexibility with regards to how services can adapt staffing ratios or service models, and how they can utilise funding might help them to respond to increasing or changing levels of complexity and support needs.
- 5.6. Another issue raised by services is the need for additional and more specialist training to enable staff to meet the increased complexity of support needs they are encountering within services. In particular, they highlighted training on mental health, suicide and self-harm due to the increase in volume and severity of these issues, more specialist training on substance use due to the rapidly evolving nature and use of substances among people they are supporting, and how to deal with the risk and reality of exploitation, abuse and violence facing people using and delivering services.

Improved responses from statutory services

- 5.7. As outlined in the previous section on public services, the homelessness and housing support sector believes that faster and more effective responses from other services such as health, social care and criminal justice would help them to meet the needs of people with complex and co-occurring support needs.

Housing First

- 5.8. Housing First is an internationally proven model which aims to provide a settled home and intensive support as quickly as possible to people who have experienced repeat homelessness, trauma, mental health issues, substance use issues, and/or engagement with the criminal justice system. This often includes people who have been failed by traditional approaches and systems.
- 5.9. In February 2018 the Welsh Government published policy guidance about Housing First and provided funding to support the development of the model in Wales. Over the last few years, the number of Housing First projects in Wales has grown significantly and there is a commitment in the Welsh Government's Ending Homelessness Action Plan to support further expansion:

“Housing First and/or other intensive options, must form a key part of each authorities rapid rehousing approach and in particular be the default approach for those who are identified as requiring high needs.”

5.10. Over the years, robust international evidence has proven how effective Housing First can be, with the model rolled out across many countries in Europe. Finland was an early adopter of Housing First, with the model being credited as a key factor in significantly reducing the level of homelessness in the Nordic country. Housing First is based on a set of principles that underpin the model and make it so effective, leading to strong tenancy sustainment internationally, which has been proven over decades. It is essential that fidelity to the model is maintained, in order to ensure that it is effective. The Welsh Government's Ending Homelessness Action Plan reinforced this:

"We must resist the temptation to dilute existing Housing First services in the face of additional demand as a result of adopting rapid rehousing or risk repeating the failures of the past, and see some of Wales' most marginalised and disadvantaged citizens left without a service that can meet their needs."

5.11. Housing First is currently available in seventeen local authorities in Wales and has supported over 300 people into tenancies, with multi-agency support wrapped around them. The tenancy sustainment rate in Wales is 91%, which is hugely impressive given that this is a model that is targeted at people who have experienced repeat homelessness.

5.12. It is essential that the model continues to be expanded to every local authority in Wales, to meet the housing and support needs of people who have experienced repeat homelessness, trauma, and multiple disadvantage. It is also critical that Housing First services are delivered in line with the principles, to ensure that the model is successful. There should be a sustained focus on ensuring that this happens in every local authority area, and that housing, health, social care and criminal justice partners enable the successful delivery of this model.

Co-commissioned services

5.13. As outlined in the section on public services, there are some very good examples of joint working, and co-commissioning or the provision of health funding has been key to making this happen. We strongly advocate for more co-funding and co-commissioning, particularly between housing/homelessness and health/social care. The complex needs funding provided by the Welsh Government's health directorate is a very good example of this.

5.14. However, this approach should become the norm, rather than the exception. Welsh Government directorates should continue to explore how joined-up approaches to policy and funding can enable the co-commissioning of services to meet the needs of people with complex and co-occurring support needs. As a regional level, the Regional Partnership Boards and key statutory services should improve their understanding of these issues and ensure that their plans include the provision of housing, health, care and support for people with experience of homelessness and multiple disadvantage.

5.15. We also believe that the Welsh Government, in partnership with key stakeholders, should consider whether alternative models of accommodation-based services are required for people who have long term health and care needs, but have experience of homelessness and multiple disadvantage. We are aware that some people remain in supported accommodation for much longer periods than intended, due to their health and social care needs not being met by other statutory services. It appears that their previous experience of homelessness has led them to being placed in homelessness schemes, but their longer-term needs are health and social care related. Sometimes, their experience of trauma and adversity, coupled with mental health and substance or alcohol issue, can mean that social care services do not have appropriate residential settings for them to be appropriately accommodated. While housing related support workers have invaluable expertise in supporting some of the person's needs, their primary needs are health and social care related. There are models in other countries that provide accommodation-based settings for

people with a history of long-term homelessness and/or alcohol or substance use, that are co-funded and co-commissioned by health, care and housing, with health and social care professionals on site to support people. We believe it would be useful to explore whether this is a model that might work within the Welsh context, with a commitment to co-fund from health and social care, alongside housing.

6. Conclusion

- 6.1. We are grateful for the opportunity to respond to this consultation, and in particular welcome the opportunity for the Senedd and key stakeholders to consider how public services can work more effectively together, and whether new models of housing and support needs to be developed to meet the needs of people in Wales.
- 6.2. We do not claim to have all of the answers, but believe that strengthening funding, increasing the role and responsibility of other public services, and giving serious consideration to how we collectively meet the needs of people facing multiple disadvantage is critical if we are to end homelessness.

**Senedd Local Government
and Housing Committee
Inquiry on housing support
for vulnerable people
Crisis response: February 2025**



About Crisis

Crisis is the national charity for people facing homelessness across Wales, Scotland and England. We know that homelessness is not inevitable, and we know that together, we can end it.

We provide services directly to people experiencing homelessness, carry out research into the causes and consequences of homelessness, and campaign for the changes needed to end it.

Our South Wales Skylight provides direct one-to-one support to people who are at risk of or experiencing homelessness in Swansea, Neath or Port Talbot. We help our members find safe and affordable homes and support with accessing benefits, healthcare services and employment opportunities. We also offer a range of learning, social and wellbeing opportunities.

Our Wales Policy team works closely with Members of the Senedd from all parties, contributes to working groups and advisory groups, responds to consultations and calls for evidence, and connects with policy teams in other organisations in Wales.

Our Best Practice team works with local authorities, third sector partners, businesses and other organisations on a range of homelessness projects across Great Britain to identify, test and promote ways of ending homelessness.

We are passionate about working collaboratively across the sector to seek positive policy solutions to help end homelessness in Wales.

About this response

This response has been written by our Wales Policy team, with input from Crisis members who have lived experience of homelessness and the South Wales Skylight staff team

Whilst Crisis' frontline service is not funded by the Housing Support Grant, we are aware that HSG plays a vital role in enabling public and third sector housing support services across the country to prevent and end homelessness.

Inquiry terms of reference: Crisis response

1. How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill

We appreciate the Welsh Government's investment in HSG through the recent draft budget; however, we worry about the impact of rising costs on vital services and believe that greater investment is needed across housing and homelessness prevention as well.

Housing Support Grant

Many services accessing this fund have been under constant pressure over the last decade, and under the added strain of the current cost-of-living crisis, the sector has been facing ever-increasing pressures as both running costs and demands for services have increased.

Crisis supports the Cymorth Cymru and Community Housing Cymru [Housing Matters campaign](#), which makes clear the significance of investment in HSG. It highlights that every £1 invested in Housing Support Grant services delivers a net saving of £1.40 for other public services in Wales.

Following a previously frozen budget and campaign, the uplift to the Housing Support Grant last year was welcome and helped to address concerns raised by a number of services around real living wage for staff. However, as the cost of running services rises and more people in Wales face homelessness and require support from services, it is imperative that the Welsh Government invests further in HSG. To this end, the £21million uplift in the December draft budget was warmly welcomed.

However, as services now face increased pressure with new requirements on National Insurance Contributions, many commissioners will now be in the unfortunate position of needing to utilise increases to address these costs – Crisis is aware of concerns that, without taking such action, the increased National Insurance Contributions threaten the continuation of services. Indeed, Cymorth Cymru reports that on average the increase will amount to £120,162 for its service providers, with one service provider quoting £621,000. These increased costs will, again have an impact on services' ability to meet rising demand and to retain skilled workers by paying the real living wage.

As Wales moves towards a Rapid Rehousing approach, our frontline services will play a crucial role in supporting people out of homelessness and into homes and it is imperative to continue to invest in the HSG.

Homelessness Prevention Grant

To truly transition to a rapid rehousing approach and effectively implement anticipated new homelessness legislation on ending homelessness, it will be important to complement investment in HSG with investment in homelessness prevention. This budget line was flatlined in the Welsh Government's most recent draft budget.

Amidst the cost-of-living crisis and with homelessness at record levels, we must implement new legislation to improve the way that homelessness is relieved in Wales and drive homelessness prevention further upstream to reduce homelessness presentations in the future.

This will not only prevent the significant personal trauma homelessness causes for individuals and families but would also make cost savings across public sector spending.

There is a wide range of research demonstrating the increased health and social care needs among people experiencing homelessness, including evidence specific to Wales.¹ Without investing in homelessness prevention, we place additional cost pressures on our health and social care sector.

Therefore, investment in prevention addresses both the human cost of homelessness and the wide and long-term financial cost to the public purse.

¹ For example: Song, J., Moreno-Stokoe, C., Grey, C., Davies, A., (2021) [Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic](#). Public Health Wales.

Beyond the anticipated new legislation, we know that the Homelessness Prevention Grant is used to fund advice services across all local authorities in Wales², as well as many other key projects.

We urge the Welsh Government to consider investment in this area as a key part of current homelessness support provision, as well as a vital part of future cost savings to health, social services and the wider public purse.

Social Housing Grant and the Transitional Accommodation Capital Programme

It is critical that the HSG sits alongside a healthy budget for increasing levels of affordable homes in Wales. These homes are needed to move people on from support services and to reduce homeless caseloads.

The Welsh Government's recently announced £81 million investment in the Social Housing Grant and Transitional Accommodation Capital Programme is welcome; however, it is important to highlight that the findings of the Audit Wales report³ suggests that an even greater level of funding will be required to meet the Welsh Government's target of delivering 20,000 new social homes.

Investing in social housing and ensuring there are suitable homes for people to move into is a critical part of Wales' journey towards a rapid rehousing approach and the broader legislative reforms which aim to make homelessness rare, brief and un-repeated. We urge that the Welsh Government continues to seek ways to invest in the SHG.

TACP funding plays a crucial role in providing more suitable interim accommodation and decreasing the numbers of individuals in temporary accommodation. However, over time, we would expect investment in this area to decrease, while SHG funding should increase further to provide more permanent housing solutions. It is essential that Rapid Rehousing Transition Plans (RRTPs) and local planning processes fully account for this shift, ensuring that this forms part of strategic planning efforts.

2. Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce;

As explored above, there are many pressures on the delivery of HSG-funded support services, and these pressures only seem to be growing.

For example, these pressures include supporting increased caseloads, increased running costs of services as a result of the cost of living, and struggles affording to pay at least the real living wage in order to protect and retain skilled workers. In addition, the changes to employer National Insurance Contributions announced in the UK Chancellor's Autumn Budget will incur significant additional costs for homelessness support providers, and many organisations across the sector are concerned about how they can absorb these costs.

Again, we support the [campaigning of Cymorth Cymru and Community Housing Cymru](#) on this matter.

3. How much is known about service performance, including data on outcomes

² Shelter Cymru (2025) [Investing in ending the housing emergency: does the draft budget go far enough?](#)

³ Audit Wales (2024) [Affordable housing](#)

Crisis welcomes the introduction of the Housing Support Grant Framework and the connections of data from this framework with the Ending Homelessness Outcomes Framework. However, both of these data systems have only recently been introduced and we have not yet seen the data derived from the Housing Support Grant Framework. Given that our services are not HSG funded we are unable to comment on the collation of this data.

4. How effective is joint working between housing support services and public services such as health and social care;

It is clear that, for many, homelessness interconnects with other factors – leaving care, facing mental health difficulties, fleeing abuse, and leaving prison are just a few of the trigger factors that can push a person into homelessness. The stresses and strains of experiencing homelessness can also cause further matters to arise – for example a person’s physical and mental health is often exacerbated when living out the trauma of homelessness.

It is, therefore, important to consider homelessness as more than a housing issue. If we are to truly move homelessness prevention upstream, we must work across agencies to identify risks of homelessness at the earliest opportunity. And if we are to support people out of homelessness and to retain tenancies, we must also look holistically at their support needs, again working across agencies.

Unfortunately, as was strongly reflected through the work of the [Expert Review Panel](#), there are currently significant barriers in effective joint working structures.

In 2022-23, Crisis co-ordinated and contributed to the [Expert Review Panel](#) which considered how legislative change could help to end homelessness in Wales and informed the writing of the Welsh Government’s Ending Homelessness White Paper.

The panel’s membership consisted of representatives from local government, housing associations, third sector homelessness and equality organisations as well as experts from academic and legal fields. Its work involved detailed evaluation of current legislation based on research from across the UK and other nations, engagement with 300 people with lived experience of homelessness in Wales, and consultation with public and third sector professionals in the following fields: housing and homelessness; health and inclusion health; disability/disabled people’s rights; social services; children’s rights; criminal justice; violence against women, domestic abuse and sexual violence (VAWDASV); housing support for ex-service personnel.

The panel heard a strong message from housing workers that they needed greater co-operation from other agencies – both in terms of early referrals and in relation to securing support needed for an individual. This message was strongly echoed by experts by experience who emphasised the need for greater collaboration between services, and the need for this collaboration to extend beyond referral stage.

We know that there are some good examples of joint working that take a progressive approach towards preventing homelessness across the public sector. However, during stakeholder engagement conducted on behalf of the Panel, we heard from professionals that where things are working well, this is often due to the personal passion of certain post holders and ways of working are not consistent across Wales.

Feedback from members at Crisis Skylight South Wales

To inform our response to the Welsh Government's White Paper on Ending Homelessness, we asked Crisis members in a survey:

"In your experience, how good are public services in working together to provide support to people who are at risk of or experiencing homelessness?"

They could rate the following services 'very good', 'good', 'fair', 'poor' or 'not applicable':

- social services
- A&E department at the hospital
- other department at the hospital
- midwife services
- GP/doctor
- NHS mental health services
- probation service
- police
- prison service
- Job Centre Plus
- drug and alcohol services

Feedback on all of these public services was variable, with every single service receiving both positive and negative responses. This reinforces the evidence of inconsistency across public services and the variation within each public service, demonstrating the need for a more consistent approach across Wales.

In particular, Crisis members reported the need for more joined up working with job centres, probation services and better access to mental health services, as well as health services generally.

For example, one member said their GP practice told them they could no longer see them when they became homeless because the homelessness shelter they were sleeping in was not in the surgery area.

Other members emphasised that, where there is a lack of co-ordination between services, people are often asked to repeatedly share the same details of their history, current situation and support needs with multiple professionals. This can be retraumatising.

Another theme reported by our members, and by experts by experience within the panel work, is that it can be difficult to navigate support across different agencies. In particular, we hear that people face long waits for mental health support, during which their housing situation can worsen. We also heard that people can struggle to access support for a dual mental health and substance misuse issue, despite the often interlinked nature of these difficulties.

In our survey, we also asked Crisis members how working across public services could be improved. A key theme was improvement of communication and information sharing between public services:

"Communication is key and needs to be improved."

"I think doctors and the job centre should be more effective when passing information on to housing options so they can process peoples applications more fairly"

"They [Housing Options] should work closer with medical/ health staff to get medical evidence."

Feedback from staff at Crisis Skylight South Wales

Our members often find it difficult to access social care and safeguarding assessments.

We understand that due to the high demand on services the threshold to access this support is high; however, without the skills and resources of these specialist services, it is difficult for to access preventative support.

Many of our members are deemed “not complex enough” or “not in enough of a crisis” to be eligible for mental health support, but too complex to access domestic abuse support and/or a refuge. This means they are stuck in an uncertain limbo, where without these supports they are likely to develop further complexity of need.

One particular aspect of this problem relates to the vulnerability assessment required by the Housing Wales Act 2014, which determines whether or not a person has a priority need for accommodation. The Code of Guidance states: “The assessment of vulnerability will need to take into account any medical information given in support of the application. It is for the Local Authority to make any further inquiries it deems necessary with any health professionals involved in the provision of any treatment.”⁴

However, we know that this part of the guidance is not always followed, and our members often have to take on the responsibility of chasing their medical records to support their homelessness application. This can be a complex and arduous process which is particularly difficult to navigate for people who are already experiencing the trauma and chaos that comes with experiencing homelessness. Better communication between services would prevent this burden falling to the applicant.

Recently, we have also encountered barriers with the new Right Care, Right Person Framework (currently being implemented by a number of police services across Great Britain). While this framework was introduced with the aim of ensuring people can access appropriate care from the right service, we are finding that it is presenting barriers to support where staff have concerns about our members’ wellbeing and/or fear they may be at risk of mental health crisis.

Our project work

Crisis is involved in a number of different projects which seek to support practices to help end homelessness. Often multiagency working is a key linchpin to such work.

We often encounter key barriers around the ability to share data and information across agencies as well as different organisations holding different Key Performance Indicators, which drive their organisational aims. We believe greater consideration in these areas would be helpful in improving effective multi-agency delivery.

The White Paper on Ending Homelessness

The Expert Review panel made key recommendations around introducing new public sector duties to help identify, act, refer and co-operate where a person is at risk of or experiencing homelessness, with a view to assisting greater collaboration between services. Crisis was pleased to see this recommendation reflected within the Welsh Government’s White Paper on Ending Homelessness

⁴ Welsh Government (2016) [Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness](#)

and, as identified within the summary of consultation responses, that this proposal has attracted wide-ranging support.⁵

It will be important to press ahead with introducing these new duties. It will also be important to explore further how these new duties can be implemented effectively across different organisations, looking at clear information on what actions organisations can take, how awareness of homelessness and the new duties can be raised across organisations, and how these duties can be supported by existing systems and structures.

We are also pleased that the White Paper on Ending Homelessness recognised the need for a case co-ordination approach for people who have complex support needs, with the service equipped with the expertise most suited to meeting the individual's needs taking the lead in meeting those specific needs. We feel that this approach is another key solution to improving joined up working to prevent and end homelessness.

However, we would urge the Welsh Government to reconsider the suggestion that this approach is only used when an individual requires input from three public services. We are concerned that requiring input from three services to warrant a case co-ordination approach will exclude a significant number of people, and potentially exclude those most in need of this approach. Some Crisis members do not engage with certain services due to a lack of trust and/or because of a difficult experience with the service in the past. The higher the complexity of needs, the more likely this is to be the case, so the need for three services could exclude these members most in need of this coordinated approach.

5. What services should be commissioned in future to effectively support people with complex needs to find and keep a home.

A significant part of the Welsh Government's Ending Homelessness Action Plan is the commitment to delivering a Rapid Rehousing (RRH) approach to ending homelessness, which ensures that individuals experiencing homelessness are quickly moved into stable accommodation. A key aspect of this approach is providing comprehensive, wraparound support for those with more complex needs.

At our South Wales Skylight, more and more people with complex support needs are approaching us for support because they are unable to access the specialist support they need. This is also being reported by other organisations across the sector.

Prolonged stays in unsuitable temporary housing are causing people to develop more complex needs, and we know that this situation is not likely to improve in the near future, given the shortage of affordable housing across Wales. During stakeholder engagement conducted on behalf of the Expert Review Panel, we heard many cases where people requiring support from more than one public service were "ping-ponged" between different services, with no service assuming a lead on their support. This often meant that people who had experienced trauma were at risk of re-traumatisation as they had to repeatedly share the same details of their history, current situation and support needs with multiple professionals.

During the Expert Review Panel stakeholder engagement, stakeholders raised that a key enabler of joint working between different services is the co-location and of co-funding of services.

⁵ See https://www.gov.wales/sites/default/files/consultations/2024-04/analysis-for-the-white-paper-on-ending-homelessness-in-wales_1.pdf, page 13

One Crisis member said:

“An integration of services throughout all sectors including mental health, physical health, addiction services, DV & SV services, police & probation, homelessness, training & employment, treatment and therapy etc... The treadmill of trauma that is currently available blatantly isn’t working.”

We appreciate the Ending Homelessness White Paper’s commitment to consider possible co-funding of multi-disciplinary homelessness and housing support teams with dedicated mental health expertise, co-location of services, or pathways that enable swift access to NHS mental health services for people experiencing or at risk of homelessness. This would certainly assist with collaboration across some of the key services accessed by people experiencing homelessness and would complement the ethos behind the new public sector duties.

We understand that the Welsh Government is looking to Cardiff and Vale Health Inclusion Service as an example of good practice in this area, as well as the work of the national health and homeless charity, Pathway. We consider that it would be helpful to consider how learnings from these areas could inform improved practice across the country.

In addition, Crisis is also an advocate for the increase of Housing First projects in Wales. Housing First has proved to be a highly successful approach to meeting the needs of people with complex needs and this should form a key part of the Welsh Government’s wider work in moving towards a rapid rehousing approach.

As well as commissioning these types of services, Crisis would emphasise the importance of the aforementioned proposed legislative changes around wider public sector duties for preventing homelessness and case co-ordination as enablers for the success of these services.

In addition, we would draw attention to the Expert Review Panel’s recommendation for the establishment of new Joint Homelessness Boards, which would help to monitor whether services are working collaboratively to resolve homelessness, discuss complex cases, share existing good practice, and investigate where there are incidents of a serious nature.⁶

Crisis is pleased that the Welsh Government supports the principle of this recommendation and understands the position outlined in the White Paper, which is to explore how existing partnership functions or boards might be able to deliver these policy aims. However, we are aware that existing Regional Partnership Boards do not currently provide adequate space for detailed planning of support for those experiencing or at risk of homelessness.

To facilitate effective oversight within health settings, we would also welcome further consideration of the panel’s recommendation on identifying homelessness leads in each health board.

More information

Thank you for reading this response. For further information, please email Jasmine Harris, Senior Policy and Public Affairs Officer: Jasmine.Harris@crisis.org.uk

⁶ Expert Review Panel (2023) [Ending homelessness in Wales: a legislative review](#). p.64.

Platform response to the Local Government and Housing Committee inquiry into Housing for Vulnerable People

Key messages:

- **Understanding the role of a support worker:** We need Welsh Government, members of the Senedd, professionals across Wales and the public, to have a greater understanding of the role that support workers play in prevention of homelessness and other harms – and also the work they do to connect to people in serious distress.
- **Increasing need:** our public service ‘safety net’ is failing people, that as a result people are arriving in the housing system with a lifetime of unmet need and that creates huge distress and pain for people we support within services. This is not a sign that people “have” complex needs, but a clear indication that our public services cannot provide people the support they need, at the time when they need it, and instead services are picking people up at crisis point when all else has failed.
- **Coordinating between services:** housing support has a key role to play in the coordination of services and is relied on to link professionals together, to hold people in periods of distress, to connect people to the right services at the right time, and to act as an often-unofficial advocate for people who are struggling. Often, housing support acts in this role whilst at the same time not always receiving professional recognition for this from other services.
- **Growing trend towards larger specialist homelessness accommodation:** we are concerned about the growth of larger supported housing units, in blocks, designed for exclusive use in housing people experiencing homelessness. We do not believe this is an effective or safe development, despite the best work of respected providers and landlords in this space. This should not be an option that we adopt more widely across Wales and runs counter to the principles of rapid rehousing.
- **Key elements of the Housing Support Grant legacy and structure can sometimes hold us back:** particularly, the inconsistent application of ‘eligibility’ criteria is one that in some areas holds us back from making creative, progressive choices for service delivery, that we know would benefit the person accessing support.
- **Funding challenges, exacerbated by the National Insurance changes, continue to be a barrier for service providers.**
- **Support work can be a difficult role and often involves serious incidents and we believe this needs a clear commitment for clinical supervision to be incorporated into every service commissioning specification.**
- **We need commissioners to agree to a minimum salary level when commissioning, set at the Real Living Wage level.** As a reminder, there are commissioners that are accredited Real Living Wage employers for their own staff, who still commission at a level that does not allow commissioned services to pay salaries at that level and remain sustainable.

About Platform

Platform was born in 2019 from Gofal, a mental health charity established in Wales in the late 1980s. Through decades of working across housing and mental health, we gained real insight into the reality of mental health in society, the impact of trauma, and

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the causes of distress. That work led us to change our focus and become Platform, the charity for mental health and social change.

Today we work with over 13,000 people a year. We support people of all ages, across urban and rural communities, in people's homes and alongside other services. Our work spans inpatient settings, crisis services, community wellbeing, supported housing and homelessness, businesses, employment, counselling, schools and youth centres.

Understanding the role of a support worker

Our core message, before we approach the questions set by the Committee, is the need for politicians, officials and other stakeholders – and the public – to better understand the role of a support worker. The people in these roles are fundamental to working alongside people in distress, and yet in a society where we rightly acknowledge the vital roles of NHS staff, and care workers, the role that support workers play goes all too often overlooked.

Broadly, tenancy support is offered in two areas: floating support and 'fixed' support, typically within supported accommodation.

Floating support is offered to people who are holding a tenancy, either within temporary accommodation, supported accommodation, or with their own tenancies either through a social or private landlord. Depending on the nature of the accommodation, and particularly the needs of the person, this can be difficult for many reasons.

Floating support means that more people can be seen, and often they are people with lower levels of need¹. However, it can mean that support workers find it harder to build close relationships with the people they support, as quickly as they would like. It also means support workers can spend a lot of time worrying about how someone is coping. A lot of their work is focused on coaching, supporting people to live more *interdependently*², so that eventually the support can end. At Platform, we try to keep our doors open to people returning if they hit a crisis point, but again that is very dependent on the relationships we have with commissioners.

'Fixed support', usually within supported accommodation, tends to be focused on people experiencing higher levels of distress, who have longer-term disadvantage and have been made more vulnerable by society and our systems. This can look like mental health distress, reliance on substances to regulate, or other factors.

Supported accommodation is an incredibly rewarding role – but it is also a hugely difficult one. Increasingly, we are seeing people who have been let down by the system hugely, and as a result can need much more time and support to feel safe and secure in their accommodation.

¹ We return to the concept of "lower levels of need" further along in the submission.

² We use the phrase *interdependently* in place of *independently*, because no person whether receiving services or not is truly independent. Everyone needs connections, support and help in their life. The pursuit of "independence" is not helpful, but working with people to connect them to communities and to other people is one of the best ways of preventing, or reducing the impact of, or recovering from, distress.

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This year to date, we have had 14 serious incidents (risk to the individual or public/staff, high level safeguarding concerns, or violent offences), compared to 9 in total for the last financial year. Whilst these numbers are not high as a proportion of our total tenancies or people we support, each one reflects significant risk or challenge both for the individual tenant, as well as for staff. Total anti-social behaviour (these are not serious incidents but are considered still high risk) for the year to date is 36. This cannot be compared to last year due to data system changes, but our assumption is that it has increased, leading us employ an additional housing officer to support. Notices served last year were 3 in total, and in the year to date, 6. Abandonments have doubled from 2 last year, to 5 this year to date. This concerns us from a support perspective, because it means someone's mental health may have deteriorated to the point where they cannot cope and may be returning to homelessness. We are confident these figures are comparative with those of other providers across Wales, we are sure this is a challenge that all providers and social landlords are facing. We believe it reflects a need for more bed spaces, or community mental health support. The lack of move-on accommodation has entrenched people into supported accommodation, and problems can worsen – or people can feel vulnerable when they need to leave (based on the two-year funding limit for supported accommodation stays).

Within support, our colleagues can witness very difficult and traumatic events. They have lost people to suicide, they have seen threatening behaviour from visitors, or sometimes from the distressed tenants themselves. They must navigate the right line with substance use, between reporting every instance and risking someone's tenancy, and safeguarding the person and the other guests. They must balance potential evictions in the most serious circumstances, with their own desire not to make someone homeless. They are witness to people often in their lowest ebb, and will sit without judgement, and listen. They have, rarely, but occasionally, been assaulted. They build strong connections with tenants, and try to build good communities within the accommodation, and they also work hard to maintain positive relationships with the wider community around them.

Increasing need

People who become homeless have fallen through every other safety net we have in place. They are people that have been excluded from every other service, labelled as 'too complex', and then experience public hostility when sleeping rough. They are people who have been failed – by lack of housing, by generational poverty, by intergenerational trauma, failure of systems, lack of resources for communities, schools that couldn't understand them, health systems that couldn't meet their needs in the right way. What looks to the outside as an increased complexity of need, is fundamentally about the failure of our public services in a harmful and painful way.

We cannot sugar coat the situation for people. We are seeing, after 14 years of austerity and historic underfunding of the public sector, systemic collapse. There is not enough housing for people who need it. That continues to lead to the widespread use of temporary accommodation to plug that gap (sometimes with support, sometimes not). We know that temporary accommodation is harmful in the long-term. We shared evidence to this fact with the Finance Committee, whilst copying the submission to this Committee too, in November 2024.

Temporary accommodation currently costs local authorities £99m per year, and the figure is expected to rise. Recent data from England has found the appalling and

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shocking cases that “at least” 74 children have died, with their deaths linked to temporary accommodation³.

The backdrop of people needing help after years of system neglect is leading to increased need for housing, which in turn leads to the placing of those same people in temporary accommodation. That leads to worsening outcomes for those people, and the distress they had initially only grows. That then means they are often not able to be placed quickly within ‘general needs’ housing and are instead allocated to specialist supported accommodation. Because of the crisis with housing supply, often people are placed within supported accommodation without the provider having the ability to create the right ‘mix’ of people. This is a critical point: whilst no provider should turn someone away, it is also important for safety to have the right mix of people in supported accommodation. With staffing levels often reduced because of funding, safety is paramount, and so getting the mix of tenants right is the first step to do that, preventing greater harm down the line.

We also see, increasingly, support services from the third sector being relied on to plug a gap in statutory services, or to deliver much-needed preventative work. This is invariably delivered by a workforce who are paid less than their NHS or local authority counterparts, with increased pressure on conditions, all at the same time that their expertise and experience is needed more than ever before. This is not for want of trying by providers – at Platform we are committed to the Real Living Wage, to offering the best terms and conditions we can. But there is a limit, within the cost envelope allotted to us by commissioners (and to *them*, by public finances), to what we can do. Our message here is simple: if you value the work that support workers do – recognise that.

Coordinating role between services

One of the key areas where support workers are invaluable, is acting as a coordinating role between services. Often, support workers regardless of whether they are floating or fixed, will build a longer-term connection with someone they support. They get to know them personally, they understand when they may be giving signs of a mental health crisis, they know the best ways to engage with people, they know which members of their family are trusted and which are not, they know what they care about, what they are interested in, and how to help people motivate themselves. As a result, when support workers need to step into a multi-agency meeting, or make a referral to community mental health services, or reporting someone missing to the police, or take any official action, they are coming from a position of deep expertise and experience with that individual’s needs, in a way that cannot be replicated by any other statutory service.

That is a critical point, and so worth re-emphasising: statutory services cannot, due to time pressures and funding challenges, build a deep knowledge of an individual’s needs except after years of work. A support worker can build that connection quickly. It does not happen with every person, of course – but it does happen regularly. If a support worker raises a concern for a tenant, or someone they are supporting, it can with the right system, carry significant weight and mobilise additional support or activity from statutory services.

In parts of Wales, this does work – we have positive relationships with community mental health teams, with local community police, and social workers, for example. However,

³ [Temporary housing linked to deaths of at least 74 children - BBC News](#)

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our support workers do often find that their professional judgement is not always respected or welcomed. The expertise they have developed and built can be easily dismissed by statutory services who are themselves understandably overwhelmed and beleaguered.

Responding to specific queries from the Committee:

We wanted to respond specifically to the queries raised by the Committee, in addition to our context-setting above.

How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill

We are concerned about the lack of communication on the progress of the Bill, from Welsh Government. We welcome the rapid rehousing transition, but the key challenge here is the supply of housing. We cannot move to a rapid rehousing approach to homelessness in Wales, without significant volume of new social or private rented housing.

Without that supply, we are concerned that a rapid rehousing transition would more closely resemble larger temporary accommodation units with support attached. This approach would inadvertently lead Wales to begin institutionalising homelessness, potentially under the guise of a progress rapid rehousing transition. This may feel like a leap of logic, out of context, so it is worth exploring.

Without new supply of social homes in the numbers we need, but with a renewed focus on rapid rehousing, it is more likely that single-bed accommodation in new-build flats will become one of the solutions to short-to-medium-term supply challenges. Examples of this include recent developments in parts of Wales, which offer accommodation for over fifty people experiencing homelessness, in a complex of flats. Whilst we do not doubt landlord or providers' effectiveness and values, or doubt that the local authorities commissioning these models are taking the only choice they feel is available to them, this is not the future for homelessness provision that we believe the Welsh Government wants to see. However, it is the future that will be most likely without concerted effort to build homes on a dispersed basis. Without that supply, the only alternative will be numerous projects like those mentioned above, where people live in a complex devoted specifically and, in its entirety, to those with experience of homelessness. At Platform, we see already how dysregulating and isolating it can be for people to be defined by their experiences, to be placed with other people experiencing high levels of distress, and the negative outcomes that can come about as a result.

This may, sadly, be the only option available to Wales in the short-term, if social housing supply does not increase rapidly and at scale. However, at that stage, we would want the Welsh Government to be clear and forthright that projects in that mould do not class as rapid rehousing. To do otherwise would be to take an approach that obfuscates the reality of the housing crisis and would do a gross disservice to the people we are here to support. This is the point at which those options could be scrutinised properly, before they become the default setting for support, and set homelessness and support back decades.

We would want to see a coordinated, planned approach to rapid rehousing, with Regional Partnership Boards, to ensure that health and social care services are

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coordinating alongside housing, to effectively and efficiently implement a rapid rehousing plan. Currently, we are not confident that this wide-spread engagement is happening, although we appreciate that the Welsh Government will want to work on the Bill first. We are, to conclude, in a holding pattern, until we can see the progress of the Bill. Until then, what we see is the combination of increasing needs, lack of social housing stock, and continued concerns about integration across services – all of which will need to be addressed if rapid rehousing is to be a success.

Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce

We have addressed much of this question in the context-setting above. We are hugely proud of the work of our colleagues, at Plattform and across the sector. They work in extraordinarily difficult situations, and they have built strong teams, with positive and effective ways of working, that are a testament to their qualities as professionals. Without their work, Plattform could not speak with the experience we have, about the challenges facing our communities. We know that for every response we give, it is built on the expertise and experience of our teams on the ground.

The people we support need stability, consistency and a highly skilled, trained and supported workforce. Without high quality training, good supervision and reflective practice, without pay that recognises people's skills and allows providers to retain that experience, it is becoming harder and harder to deliver the quality services we know that so many people rely on.

The latest announcements about National Insurance changes have significantly challenged us as an organisation. We are committed to remaining a Real Living Wage employer and working hard to find the means to do this despite an increased National Insurance bill. It is a deeply frustrating situation to be in, and it is at its core, fundamentally illogical. Whilst we understand, again with compassion, the challenges facing any government in these financial circumstances, we cannot understand why an exemption has been given to local government – but not the third sector that the same local government sector commissions from. Whatever the cost of the National Insurance rise, it will have to be borne by local government commissioners – invalidating much of the same exemption they have already been given.

The challenges this will place on the Housing Support Grant, given we have not seen evidence of a UK Government clarification, are significant. Rather than using the uplift from the draft budget, to invest in new services, or to provide clinical / reflective support for the sector, instead much of it will need to be used to meet the National Insurance costs. It is a hugely backwards decision, and we have raised it again here, as we are still hopeful that the UK Government may yet clarify its position.

We mentioned above the need for clinical and / or reflective support, which is what we had hoped some of the additional HSG funding could have been used for. We have shared above how challenging and emotive the work of a support worker can be. The trauma they can experience first-hand, let alone vicariously through support sessions, is significant. We have seen excellent support workers leaving the profession because they are exhausted and burned out. Mental health psychologists and psychiatrists, for example, are expected to receive supervision to ensure they are working effectively, and safely, and are emotionally regulated. That cost is part of recruiting and employing a professional in that role.

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We hope to see progress on this for support workers. Whilst they are not a regulated profession, they do experience significant distress on a sometimes-daily basis, and if we want the amazing people in these roles to continue to work within the sector, we need to demonstrate that we value, respect and support them whilst they do so. Part of that is good pay and conditions which the third sector has had to squeeze – and part of that is supporting them with excellent reflective or clinical supervision as part of the role. This cost should be part of every commissioned support service through the Housing Support Grant.

How much is known about service performance, including data on outcomes

We do not believe that the new system of outcomes data has had long enough to 'bed in', yet, and would not advocate for any changes at this stage. However, we would make the point that with continued local authority cuts, we are not often scrutinised on the official HSG outcomes data – instead we are monitored locally by our commissioning officer, who will look at our reporting, our incidents, the numbers of people we have supported, and will often make a judgement about our effectiveness based on that.

If that experience is widespread across the providers within the Housing Support Grant, we would argue that the outcomes data should be aggregated to a national level and used as an overall measure of the effectiveness of the fund, rather than used locally to determine effectiveness of individual services. This should of course consider the overall impact that the Grant has on the NHS, police, social services and other sectors.

If it is to shift towards a national level, then we would want to ensure that it includes more qualitative information alongside the outcomes data, to reflect the complexity of peoples' experiences within the service.

Additionally, and separate to the outcomes data, we would encourage the Welsh Government to fund a full evaluation of the Housing Support Grant, that identifies the benefits of the support in the different settings and sectors across Wales. Whilst the evaluation report by Cardiff Metropolitan University (Montes, Fury and Taylor, 2020) is clear as to the value for money of the Grant, we believe that a wider evaluation, with Government support and data, would make it clear as to the vital role this grant plays in Wales, and not just for housing need.

How effective is joint working between housing support services and public services such as health and social care

Our experience in Platform, is that this is mixed, and dependent entirely on local relationships. Where it works well, with multi-agency safeguarding teams, or multi-agency tenancy panels, it goes a huge way towards making a person's experience of supported housing, or support more generally, as effective as it can. However, in spaces where it does not work so easily, it can be very difficult. In those occasions, professionals can at times fall back on seniority of role, qualification, or experience, and it can leave support workers being left on the outside of key decisions – not to mention the person themselves. We have, however, seen significant progress in recent years, and increasingly the ideas and perspectives from our support workers are listened to by professionals across the areas where we work. That is a significant shift, in the last five years. Whilst imperfect, it is positive.

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The overarching theme however, for public service partnership, is funding. The lack of capacity within statutory services is possibly one of the biggest barriers we face as a provider organisation. Not being sure whether we can access support or help for people we support, unless they are in a critical situation, creates a sense of frustration, helplessness and despair within our workforce. Support workers regularly feed back to us that they will make referrals, but they know they may not be picked up until there is a crisis. What this means, ultimately, is that our support workers are increasingly acting as the first line of prevention – but also stepping in to cobble together support in spaces and for situations that they were not commissioned to deliver. That could be offering crisis support to someone who has not met a threshold for community mental health services, but who would likely have met that threshold five or ten years ago. The picture for us as a provider is of a workforce that is working well in partnership with landlords, health colleagues, and social care – but is increasingly being asked to do more in the ‘grey area’ between HSG funded services and statutory. That situation is not sustainable and cannot continue.

What services should be commissioned in future to effectively support people with complex needs to find and keep a home.

In our submission to the Finance Committee in November, we expressed a need for a preventative budget that can explore mental health alternatives, along the same lines as the Housing Support Grant. This would allow vital preventative work to be undertaken across mental health as well as it does within housing. There is still a distinct lack of joined up services with oversight and accountability, that can work across the complexity of needs within the housing sector. Regional Partnership Boards could be used, and we would want to see a renewed focus on making those work effectively.

Crucially for us, when crisis and preventative services are funded from the same budget, we see a natural prioritisation of crisis spend and services. This is what the HSG has managed to avoid, both now and in its former incarnation as the Supporting People Grant. However, other services do not have the same preventative fund available, and so the work of HSG-funded services is often hampered because the support more widely for growing complexity is not available when it would have the best impact.

We need services that can flex around an individual, can unlock preventative services when they are needed, and we need a shift in the professional recognition given to support workers in housing. These are the fundamental building blocks for a service response that is needed for addressing and tackling the needs of people with housing needs and vulnerabilities.

Although it differs across regions and local authorities, we would argue that the concept of ‘eligible activities’ needs to be removed from HSG grants – this can result in support workers being overly monitored on the type of support they give. It can also lead to progressive ideas being defunded by local authorities that are nervous they are not aligning to ‘eligible activities’.

We need services funded to a minimum of the Real Living Wage, and including budgets and allocations for clinical supervision. All of these will enable us to offer freedom for providers to be specialists in relationships with the people they support, reduce bureaucracy and cost for local authorities, and crucially, centre the individual who should be at the heart of all we do.

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We also wanted to reiterate our concerns from above, about the gradual and seemingly inevitable shift towards large-scale developments for greater numbers of people, concentrated in specific areas. We must word this strongly: herding people with similar life experiences and challenges into one place is misguided, and increasing evidence demonstrates that it is ineffective and doesn't work. We need the Welsh Government to be much firmer with partners across Wales that this approach should not be adopted.

Conclusion

The Housing Support Grant's existence should be a point of pride for the Welsh Government – and indeed, the wider Welsh political system. It has been a source of cross-party agreement throughout the history of devolution, and we have seen support for it on all sides of the political spectrum. We are clear that this is because of the clear evidence for its impact, its presence within our communities, and the ability of HSG services to work with people that the system often cannot hold. It is also the envy of other UK nations, with the experiences of England after the loss of SP ringfencing in 2010 serving as a sober example of what happens when support for preventative homelessness funding weakens.

There remain huge challenges within HSG services, however. Staff morale, staff pay and conditions, the ability to process significantly difficult and emotional experiences, and often a lack of public understanding of the roles, have taken their toll on staff across the housing sector for years. The sense of public service fragmentation, a palpable realisation that there is no easy way to repair that social safety net, and the lack of support from statutory services except in the most urgent of situations, creates a sense of despair in many services. The hope our colleagues hold on to is the difference they can still make – but we know that hope is harder and harder to find.

Submitted by:

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Housing support for vulnerable people

Senedd Local Government and Housing Committee Inquiry

A response from **Housing Justice Cymru**

11 February 2025

About Housing Justice Cymru:

Everyone has the right to a home that meets their needs. The lack of a safe and stable home significantly impacts people's lives. Solutions led by local communities, in strong partnership with the voluntary, community, and public sectors, along with individuals who have lived experience, must be central to changing the housing system.

Our vision is of a community where everyone has a safe and stable home, and feeling they belong.

Our purpose is to unite diverse communities to build personal connections, help people out of homelessness, and create justice in the housing system.

Our values are inspired by the Christian principles of **love**, **nurture**, and **partnerships**.

Website: www.housingjustice.org.uk

Contact: N.Evans@housingjustice.org.uk

1. Overview

- 1.1 Housing Justice Cymru (HJC) currently provides Housing Support Grant (HSG) commissioned homelessness prevention services in Neath Port Talbot, Swansea and Wrexham. HJC also provides non-commissioned support to people seeking sanctuary in Wales, including Refugees and Asylum Seekers.

Key points:

- Models that deliver a community response to homelessness should be rolled out across Wales to capitalise on the added value that harnessing the strengths of the community can bring – both in terms of creating an increased sense of community belonging and the added value delivered to the well-being of volunteers.
- Specialist housing and support for sanctuary seekers is needed, including newly granted Refugees, to address homelessness and to support Wales's vision of becoming a Nation of Sanctuary.
- Greater transparency is needed on the impact achieved by services to allow for better comparison of what actually works, with this forming the basis of commissioning.
- Services for individuals with low to medium level support needs should be prioritised to ensure that individuals do not fall through the gaps, preventing homelessness and stopping the cycle of homelessness.

2. Citadel model

- 2.1 Citadel was established in Wales under Housing Justice Cymru in 2020. Our work in Wales spans across Swansea, Neath Port Talbot and Wrexham, where, on average, 96% people remain engaged in the project, and 98% sustain their tenancies for at least 12 months after seeking support.
- 2.2 Citadel is a volunteer-led homelessness prevention project which supports people experiencing, or at risk of homelessness, to find and/or sustain their tenancies and establish a home. Once volunteers are recruited, trained and DBS checked, Citadel Co-ordinators match them with a person referred to Citadel for support. Co-ordinators and volunteers work closely with people who have been referred, identifying their needs and providing personalised support.

- 2.3 Citadel was initially set up to support guests following their move on from Night Shelters. The need for further support, during the initial months of obtaining a tenancy was highlighted by those we support with lived experience of homelessness. Further feedback from people experiencing homelessness showed that more tailored support was needed, which focuses on the person and ‘what matters’ to each individual. As such, Citadel volunteers provide support to individuals in a flexible way that responds to their specific needs. Volunteers are rooted within their community and help the person to build a sense of belonging.
- 2.4 Citadel is sometimes described as ‘people helping people’ due to the human response provided by our volunteers, in contrast to support that feels like a service. Our volunteers are matched with individuals at risk of or experiencing homelessness, and through this process a relationship is established which is different from that of a relationship between a traditional support worker and their client. This is underpinned by the mutually beneficial nature of the relationship, as our volunteers themselves report an increased sense of community belonging and a sense of purpose from the support they provide to the person in need of support.
- 2.5 Following the impact made in Wales, Housing Justice as received UK Government funding to expand Citadel to 5 areas in England: Southeast London, Bristol, Cornwall, Sheffield and Hastings.

3. Support for sanctuary seekers

- 3.1 Housing Justice has provided over 75,000 safe nights across Wales and London for people seeking sanctuary. Over the past 3 years, HJC has developed Hosting provision as an accommodation solution, facilitating over 60 placements for people to access safe, short-term homes in Wales. Our Sanctuary Support Officers provide ongoing face-to-face support for the sanctuary seekers hosted through our network. Additionally, we have supported over 160 Ukrainian Refugees since 2023, helping them to secure permanent accommodation, and assisting the transition from hosting placements to social or private homes. We provide culturally appropriate support to enable people to rebuild their lives in the UK, through creating a sense of connection with their new community, fostering a sense of belonging.
- 3.2 The support that we provide to Refugees and Asylum Seekers is mainly non-commissioned and funded through Grants and other charitable means. Some of the people supported by HJC will have the No Recourse to Public Funds

(NRPF) condition attached to their immigration status and are destitute. Despite a person's immigration status, it must be recognised that we cannot end homelessness in Wales if we do not end homelessness for sanctuary seekers.

- 3.3 In 2019, Wales set out its vision to become a Nation of Sanctuary. This commitment was restated in 2024 through the refreshed Anti Racist Wales Action Plan (ARWAP)¹ which now incorporates the Nation of Sanctuary plan. The Nation of Sanctuary chapter as part of ARWAP commits to providing housing support to Refugees, acknowledging the transition from Asylum Seekers to gaining Refugee status and, as a result, a person loses their Home Office accommodation, as a point at which homelessness is greatly increased. Whilst a person with Refugee status can access public services, including housing, there is often very little support available to assist newly granted Refugees to secure and maintain accommodation.
- 3.4 Newly granted Refugees often face additional barriers to securing housing, including a lack of guarantor, increased costs such as 12-months' rent in advance, language barriers, and lack of community connections, contributing to the trauma that people have faced in their home country. These situations exacerbate the risk of homelessness, exploitation, harm, and modern slavery. As such, more support is needed to address the housing and support needs of sanctuary seekers in Wales.

4. Housing Support Grant

- 4.1 Increasing demand for housing and housing-support means that people's complex needs are being increasingly unmet. As capacity is stretched, people with low to medium support needs are falling through the gaps. As a result, more and more people are reaching crisis point. A recent report from the Bevan Foundation highlighted that around 20% of people in Temporary Accommodation have been through statutory homelessness services within the last 12 months², indicating that people were unable to maintain a tenancy following Temporary Accommodation, possibly due to a lack of support. There is a missed opportunity if adequate resources are not directed towards ensuring that homelessness is not repeated to help ensure that people

¹ <https://www.gov.wales/anti-racist-wales-action-plan-2024-update-html>

² <https://www.bevanfoundation.org/wp-content/uploads/2024/09/Nowhere-to-call-home-living-in-temporary-accommodation-2.pdf>

leaving Temporary Accommodation, especially those with low to medium needs, are supported to rebuild their lives within their new community. The additional benefit of a model like Citadel which uses volunteers to support those with low to medium support needs is through the way in which it harnesses the strengths of a community-led response, providing an increased sense of belonging for both the individuals in need of support and the volunteer. Citadel not only prevents homelessness for the people being supported but it also serves as a preventative mechanism for the wider population in terms of promoting well-being and reducing loneliness and isolation.

- 4.2 Despite the impact demonstrated by Citadel, expanding the model to other local authorities across Wales has been a challenge. Local authorities appear to re-commission the same services year on year rather than undertaking an evaluation into what is needed and what is working. There is a lack of transparency on how services perform, making it difficult to compare the effectiveness of provision. Whilst Citadel achieves a 98% tenancy sustainment rate for 6 months and has a 96% engagement rate, without comparative data for other HSG-funded services available, making a case for why our Citadel model is more effective (both financially and operationally) is a challenge.
- 4.3 Finally, HJC's HSG-commissioned services in Wales are currently underfunded. Whilst the increase to HSG has been helpful in maintaining the workforce, it has not improved the pressures on other project costs. As a result, our Citadel services continue to run at a deficit and the pressures on the wider organisation remain. HJC has had to draw on its financial reserves in order to provide our HSG-commissioned services which is not sustainable. We are hopeful that discussions with commissioners will result in an increase in funded to cover our full project costs going forward.



ClwydAlyn

ClwydAlyn is a Registered Social Landlord managing over 6,500 homes in North and Mid-Wales.

With around 800 staff, we provide housing management services in Conwy, Denbighshire, Flintshire, Gwynedd, Isle of Anglesey, Powys, and Wrexham.

Our mission is together to beat poverty. We want everyone in North Wales to have access to excellent quality housing, and we want to work with partners to address the causes and impacts of poverty.

Local Government and Housing Committee inquiry response: Housing for Vulnerable People

February 2025

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How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill.

The transition to rapid rehousing is admirable, however, WG need to consider how we address whole system change with infrastructures in place to enable citizens to manage independently as part of the transition. From delivering a range of services within North Wales, we see individuals and families entering our services with little or no independent living skills. On top of this, nearly all are suffering from one or more complex issue e.g. ACE's, mental health, substance misuse etc. To make rapid rehousing work, you are going to need support teams that are agile (outside of Mon to Fri 9/5), resilient, recompensed. Equally as important, we need to consider fast track routes for health services as required. To make rapid rehousing work, all services need to be better aligned and working toward a common goal that is dictated by individual budgets that often stifle progress.

An additional challenge in the unintended consequences of other policy decisions. A report issued by Savill's in November 2024 showed that 'housing supply is likely to remain constrained, as UK Government proposals to mandate landlords upgrade their properties to an EPC C by 2030 may push landlords to leave the sector. With capacity for further rental growth limited by affordability there is a perfect storm. The report from Savill's also highlighted that rental supply is low with the number of available properties down by 32 % (in September 2024) when compared with the average for the whole of 2018/19.

Moving forward, as the approach in Wales moves towards a system of Rapid Rehousing, with the pressures on the private rental sector, most of the rapid rehousing will fall to Housing Associations. To make this work, it would be beneficial for a full assessment of needs – each year. At the minute, inflation has far exceeded HSG increases in recent years, so there needs to be a review of what the baseline is and is it right. The RSL sector could evidence the proportion of tenancies where support services are needed short/medium and long term to enable people to maintain their tenancy and prevent future homelessness. These are preventative services which are really cost effective in taking pressures away from other systems such as health, criminal justice, etc.

Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce.

From speaking to our own local authorities' partners in North Wales, pressures on services are only increasing and will continue to do so for the foreseeable future. With North Wales, the cost of temporary accommodation has risen exponentially in recent years;

County	Spend 23/24	
Wrexham	£2.5 million	2.5 times higher than 4 years ago
Debigshire	£6 million	70 % higher than 4 years ago
Flintshire	£5 million	9 times higher than 4 years ago
Conwy	£4 million	6 times higher than 4 years ago
Ynys Mon	£0.5 million	Double what it was compared with 4 years ago.
Gwynedd	£6.5 million	Double what it was compared with 4 years ago.

Austerity measures have put LA's under increased pressure to manage homelessness. At the same time, we have seen longer waiting lists for mental health services, pressures on police, increased problems via county lines and exploitation and insufficient housing supply. What is interesting from the above statistics is why Ynys Mon's spend is so much lower than other Council's. From an observational point, they are far more proactive in building new social housing at a faster rate.

Given the vulnerability of residents, this put huge pressure on staff teams that are often dealing with complex situations daily. Within ClwydAlyn, we have developed 'job families' and when you look at comparable roles (not in Supported Living), it shows that staff are not recompensed to the same level .i.e the difference in market salary between a Support Living Officer compared to a Housing Officer is circa £6-7k. Traditionally, we lose a lot of staff from Supported Living internally as they can improve earning potential in other areas of the business. It is important that we value the contribution of HSG services more given the challenges (and shift patterns) that staff deal with. There has been talk of 'professionalising' the sector (with qualifications), again this is admirable, however, if it doesn't come with improved pay, it seems a little disingenuous.

The current reality from pay analysis of 2000 support workers shows real fragility. Not addressing pay overtime places real threat around achieving WG ambition to end homelessness. HSG budget, although increase this year is welcomed; leaves risk around meeting legal minimum pay requirements, alongside NI increase. Small providers very vulnerable with services at risk of closure/reduction. The survey of staff showed that;

- 18% of the workforce are struggling to pay their rent
- 56% struggling with bills
- 12% at risk of homelessness

Fundamentally, WG's aspiration should be for a valued and resilient homelessness and housing support workforce where people are:

- Fairly rewarded for the skilled, life-changing work they undertake
- Supported to thrive within a safe, healthy, inclusive, psychologically-informed working environment
- Secure in their roles, supported to develop and able to progress
- Recognised, respected and listened to by employers, public services and government

Delivery of this vision is a key requisite for achieving the Welsh Government ambition and policy objectives to ensure that homelessness is rare, brief and un-repeated, and that we move towards a model and provision of rapid rehousing

How much is known about service performance, including data on outcomes.

All the data is available however, Contract monitoring varies from Local Authority to Local Authority. Some are very robust in their reviews whilst others complete a review that is more to do with ticking boxes (this is largely due to capacity within their own teams).

Regarding the HSG framework, currently, there are 4 Primary Outcomes (with 14 indicators) and 7 Secondary Outcomes (with 25 indicators). Overall, having 39 separate indicators makes for a very complex review process. Having a more streamlined outcome framework would enable services to spend more time working with citizens on a 121 basis.

How effective is joint working between housing support services and public services such as health and social care.

There are many examples of positive joint working when a resident is in crisis. Different services pull together and have the resident at the heart of decision making. Some of the current challenges are budgets within LA's which can cause some delays in finding solutions i.e who pays is it housing budget or social care budget. The other issue is that too often, safeguarding referrals are made, however the response is that it is 'resident behaviour, they have capacity, and it is their choice to live the way they are'. Again, I believe this is largely due to capacity of resources, but it doesn't help when we know people are struggling. From a WG perspective, recognising the problem isn't enough, it needs to take positive action to address route causes. Simply providing a 'rapid rehousing' won't work for many and citizens will fail until we find better more dynamic solutions to address the current crisis (as demonstrated by the increasing LA spend on temporary housing).

There needs to be a greater emphasis on prevention to reduce pressures on statutory services as at that point, costs escalate. If there are dedicated resources to get further upstream, many challenges can be resolved at an early stage.

What services should be commissioned in future to effectively support people with complex needs to find and keep a home.

For the next generation, there is still going to be a need for traditional supported living services as rapid rehousing isn't the solution for everyone. Some SL accommodation is not great so LA's need to work with HA partners to improve stock. We have some recent examples of this in WBC where we developed a purpose-built parent and baby service and redeveloped an old night shelter which has been replaced by 20 walk up apartments. This development has an exit strategy in that they could be general needs accommodate if rapid rehousing has the impact that is hoped from WG.

WG need to invest in more preventative services and look at joint initiatives with local health boards, for example the success of ICAN hubs (funded by BCU) that are located across North Wales. In terms of citizens who pass through this service, the numbers are far greater than other services that are commissioned by LA's to solely offer floating support.

For rapid rehousing to work, there needs to be fast track routes for individuals with complex issues, otherwise there is a risk that people will be set up to fail. Several years ago, we had floating health services – so health checks at schemes, access to dentists for people, specialist workers visiting schemes to support/advise...this wrap around community approach is lacking now and this needs to be reviewed (i.e what was the cost of this versus what LA's are now spending on temporary accommodation).

Local Government and Housing Committee inquiry response: Housing for Vulnerable People

February 2025

About us

Community Housing Cymru is the voice of housing associations (HAs) in Wales. We represent 33 not-for-profit housing associations that provide almost 165,000 homes to 10% of the Welsh population.

Our collective vision is to make Wales a country where good housing is a basic right for all.

Summary

We welcome the Committee's call for written evidence on housing for vulnerable people, with an initial focus on housing-related support services. During this Senedd term, the Committee has undertaken important and valuable work on various aspects of the housing crisis, and we welcome this particular focus on the support services that we know are so important for ensuring people can avoid homelessness, escape abuse, live in their own homes and thrive in their communities.

The right support, for as long as it is needed, alongside an affordable, high quality home, is essential for meeting our shared ambition of making sure homelessness is rare, brief, and unrepeatable, and the system-wide transition to rapid rehousing.

Alongside evidence from our Housing Matters campaign, delivered in partnership with Cymorth Cymru, we conducted individual deep dive sessions with several of our members to produce a representative sector response. Key messages from housing associations are:

Challenges

- Despite increased Housing Support Grant (HSG) funding for the last 2 years, these services have been historically undervalued and underfunded. The recent increases in funding have offered some protection from the increased cost of delivering services, but not all current providers have felt this uniformly. Nor has increased funding addressed the fundamental challenge of ensuring that funding is proportionate to need and that the sector can recruit, retain, and reward its skilled workforce. This is hindering effective service delivery, particularly for people with complex needs.
- Recent increases to HSG funding have been upon a historic baseline. In the past 10 years, we have seen multiple crises - Covid, cost-of-living, the war in Ukraine, and a wider housing crisis - that combined have fundamentally altered the scale and nature of housing and support needs across Wales.

Solutions

- Local authorities' (LAs) Rapid Rehousing transition plans seek to assess levels of support needs in their communities. This is an important step forward in building a shared assessment of housing support needs. An important next step will be to continue to build upon local assessment of need and translate this to adequate funding for housing support services.
- The forthcoming Homelessness legislation presents an opportunity to enhance collaboration and address systemic issues in funding and service delivery. The [Expert Review Panel on ending homelessness in Wales](#) was clear that investment in the workforce, housing support services, and more suitable temporary accommodation, as well as an increased supply of settled housing, will be needed to deliver this ambition

We propose a three-step approach for ensuring sustainable and effective housing support services in Wales:

- 1) Stabilise the housing support sector by protecting existing commissioned services through sufficient and ring-fenced multi-year funding that fully meets the cost of delivering services and investing in the skilled workforce.
- 2) Investment in granular data on housing need to better understand the demand for, and progress made, on meeting housing support needs.

- 3) A long-term funding commitment for HSG, based on a robust understanding of need, that allows the sector to invest in the skilled workforce and services needed to prevent homelessness and support people to live well in their homes. There also needs to be recognition and investment in the wider public services that also provide support, for example mental health services.

How effectively the Welsh Government is planning for the future of HSG in light of the rapid rehousing transition and the forthcoming Homelessness Bill

Strategic and collaborative disconnects

Housing Associations across Wales report that they are supporting more people with increasingly complex support needs, and that alongside housing-related support increasing numbers of individuals also require support from wider public services. This includes but is not limited to the police, social services, mental health experts, and third sector tenancy sustainment support.

Wider pressures on public services, a fragmented service landscape, and a lack of effective partnerships in some areas can make it challenging for housing support staff to navigate and access the support people need. Housing associations report they frequently have to try and fill in the gaps when there is a lack of available support from wider public services. This is even more challenging when a person requires support across multiple disciplines. The Welsh Government's recent white paper on Ending Homelessness proposed a duty to identify, refer, and cooperate on a set of relevant bodies to prevent homelessness. We welcome this specific proposal as an opportunity to enhance collaboration and partnership working.

Our members find that it is currently very difficult for HAs to refer to health or other services. The white paper considered the potential of multidisciplinary teams, which would hopefully allow for a clearer pathway that ensures people receive the support they require to live well in their homes and sustain their tenancy promptly.

Due to a lack of internal resources, increasing levels of homelessness, and pressures to meet demand, local authorities have had varying ability to implement rapid rehousing action plans. Local authorities' Rapid Rehousing transition plans seek to assess levels of support needs in their communities. This is an important step in building a shared

assessment of housing support needs. An important next step will be to continue to build upon local assessment of need and translate this to adequate funding for housing support services.

The increase in the need for housing related support in recent years over the past couple of years means that housing support services are already stretched to their limit. An increased focus on preventative policy ambitions as part of the forthcoming Homelessness Bill must be supported by sufficient investment in the HSG for it to be deliverable and a success. We believe there is an opportunity with the forthcoming Homelessness Bill to articulate a vision for a future system that unlocks untapped potential for the HSG and rapid rehousing by building long-term funding certainty so that providers can effectively plan and deliver better outcomes.

Funding

The sector has welcomed the Welsh Government's support for the sector and increase in HSG funding over the past two years. This investment has offered temporary relief to services, and begun the journey towards appropriately funded services to ensure staff are paid their Real Living Wage. However, there is much further to go until services can pay their staff appropriately for the life-changing work they do.

The reality is, that we do not currently have an accurate understanding of what constitutes an appropriate HSG budget. Recent increases to HSG funding have been upon a historic baseline. In the past 10 years, we have seen multiple crises - Covid, cost-of-living, the war in Ukraine, and a wider housing crisis - that combined have fundamentally altered the scale and nature of housing needs across Wales.

Whilst there are some indicative data from local authority RRH plans, work needs to be done to better understand the level of need to accurately establish a new base level of funding that effectively reflects the services required. This work needs to be undertaken with urgency and aligned with the introduction of new duties and expectations as part of the forthcoming Homelessness Bill. The [Expert Review Panel](#) was also unequivocal in its final report that the success of legislative reform relies on a properly funded HSG.

Once the HSG has been rebased to account for current and future needs, we believe that a multi-year, ring-fenced commitment is required to give services the stability and confidence they require to evolve to meet needs. The multi-year commitment to the Social Housing Grant in recent budgets has made a positive difference in enabling housing associations to plan for the future and invest in more affordable housing, and we believe the same certainty is required for housing support services.

In addition to preventing homelessness, the Housing Support Grant also reduces pressure on a myriad of public services, from health and social services to criminal justice. [Research](#) conducted by Cardiff Metropolitan University found that every £1 invested in HSG services delivers £1.40 net savings to public services in Wales. The consequences of disproportionate funding will equate to even more pressure on public services as well as poorer outcomes for people. It is therefore vital that preventative funding is allocated with long-term certainty and is specifically ring-fenced to only deliver housing support services.

Vulnerable groups and wrap-around support

As part of planning for the future, specific consideration needs to be given to the increasing number of people with complex needs who require specialist housing-related support and face difficulties in navigating and accessing services in a timely way.

HA staff are concerned they do not have the expertise needed, but in many cases are providing the only source of support as the threshold of access to wider public services is high, particularly for mental health. There are particular concerns about services for people with complex needs, as well as the cohort of prison leavers that need specific wrap-around support, and suitable accommodation in a suitable location to manage safeguarding risks.

Housing Association [data](#) shows that 73% of households received some form of housing support from their HA between October 2023 and October 2024, with 20% of households receiving multiple types of support. The following case study illustrates how HSG-funded services provide impactful specific wrap-around support to maintain a home and support people's ability to live independently.

Case study: Foyer Complex - supporting young people with multiple needs

Emily*, a 16-year-old girl, was referred to the service in early 2023 due to a breakdown in her relationship with her father. Emily has a physical disability and experienced a range of mental health issues. Emily's initial engagement with staff at the service was limited; she rarely came out of her room or spoke with anyone within the project and was quite isolated. After a few weeks, the staff were able to forge a trusting professional relationship with her, and she started opening up more during her support sessions and appeared more settled.

When she moved in, Emily was already enrolled in college studying A-levels although she was struggling to engage with this due to her turbulent living conditions at the time. Staff supported Emily by attending meetings with her tutors at college to

communicate Emily's situation and ensure wrap-around support, which enabled her to remain on her college course.

Throughout her time at the service, Emily's mental health was very up and down. However, the staff was able to recognise patterns of behavior such as withdrawing from support, missing college, and appearing quiet which allowed them to intervene before her mental health deteriorated significantly. At these times, Emily was supported to speak with her GP and was also referred to outside agencies to complete talking therapy and CBT. Staff accompanied her to many of these appointments due to her feeling quite anxious.

By August 2023, Emily's confidence had grown tremendously. She was attending concerts independently and went on her first solo trip abroad. By April 2024, she began applying to universities to study social psychology. Staff assisted Emily with applying for her accommodation, and student financing and also put in an application for DSA. However, in May 2024, around the time of her final exams in college, her mental health began declining. Staff spent significant time with Emily to try and build up her confidence and remained in close contact with the support staff from the college to ensure that she could remain on the course and complete her exams, with a sufficient plan of support in place. Despite less engagement with staff during this time, they continued to try to support Emily during this time. Emily sat her exams and achieved the results she needed to secure her place at university and moved out of the project in September 2024.

Before leaving, staff supported Emily with her transition to new accommodation and ensured she had access to support from the university wellbeing team before she left to fill the gaps in support. Emily stated before leaving the project that she had never moved on from somewhere for a positive reason and has since been in contact with staff and has settled in well to her new accommodation.

Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce

Funding and fair pay

Every year for the past ten years, alongside Cymorth Cymru we have campaigned for sufficient funding for the Housing Support Grant (HSG), to prevent more people from becoming homeless, to support people well whilst they live in temporary accommodation and to ensure those who move on from homelessness have the support they need to rebuild their lives and live well in their new home. The campaign is

a direct consequence of housing support being historically underfunded and undervalued.

Housing support providers should not have to continuously fight for fair funding, reward and recognition for their workers. Ultimately, we need to secure a long-term, sustainable multi-year funding settlement that ensures these vital services continue for as long as they are needed in Wales.

Whilst we've seen increases to the Housing Support Grant for the last 2 years, in real terms, the budget has been reduced by £13 million since 2012. The lack of certainty each year due to current funding arrangements places constraints on how effectively providers can plan for maintaining current services, as well as improvements for the future. Annual threats to services' ability to continue have meant the focus has been on services maintaining provision rather than growing their offer.

Funding constraints mean this skilled and dedicated workforce does not receive the rate of pay and recognition they deserve. In our [most recent survey](#) of providers (October 2024) 79% said that they do not receive enough HSG to cover the full Real Living Wage costs and had to subsidise using their reserves, fundraising, or other income. Whilst 91% of organisations say they are paying frontline staff the Real Living Wage, it does little to account for unsociable hours, the lack of job security, and the lack of career development.

The £13m uplift for 2024/25's final budget came too late for some providers. 17% of respondents to our survey said it was announced too late to avoid some service reductions and/or staff redundancies.

We urgently need to stabilise the housing support sector by protecting existing commissioned services through sufficient and ring-fenced multi-year funding that fully meets the cost of delivering services and investing in the skilled workforce.

Impact on staff

Our research shows that 50% of respondents to our survey said there has been an increase in staff turnover over the last year. Pay is one of the biggest causes of high staff turnover in this sector. This coupled with the impact of increased caseload demand and complexity has affected staff health and wellbeing. 91% of providers who responded to our survey said there had been a negative impact on staff wellbeing, sickness, and burnout, with 41% saying this had been extremely negative. Many provided further detail about how this was affecting staff, with some hugely concerning comments about staff mental health, with one citing "It shouldn't be this hard to help people".

The Ending Homelessness National Advisory Board's Workforce sub-group has done valuable work to map actions to support and grow the housing support workforce, with a focus on:

- Mental health and wellbeing support for frontline staff, particularly concerning traumatic scenarios.
- Recruitment guidance
- Research on Pay
- Staff qualifications
- Commissioning guidance

How effective is joint working between housing support services and public services such as health and social care

Some members provided positive examples of joint working, such as:

- Collaboration between [Adra, North Wales Housing Association, and Gwynedd Council](#) to develop a building into 12 flats to provide new accommodation with bespoke support on the same site.
- Having a safeguarding officer in place has helped to improve partnership working with wider services to understand each other's remits, limits, and where others need to step in.
- Cwm Taf health board's multi-disciplinary team regularly attends housing support services and works alongside staff.
- [Boost project](#): The project works in partnership with service providers throughout Blaenau Gwent, Caerphilly, Monmouthshire, Newport, and Torfaen. and delivers new initiatives to people at risk of homelessness, currently experiencing homelessness, or people with lived experience of homelessness ensuring that people are enabled with the tools and skills they need to move on with their lives, leaving homelessness behind for good.

However, effective multi-agency work is not yet embedded across Wales. For example, one housing association described the case of a tenant with a hoarding disorder who was physically unable to manage their home. Staff struggled with access to wider services to help the tenant, and were advised by social services to take the tenant to court. Whilst a stark example, this illustrates the tension between a wider public service

system under intense pressure and the person-centred and trauma-informed response housing support services seek to offer.

Where difficulties have been identified, members have caveated with the hope that duties imposed on other agencies as part of the forthcoming Homelessness Bill will provide the legislative framework that supports effective partnership working housing support and public services to work better together.

How much is known about service performance, including data on outcomes

The Welsh Government's Housing Support Grant Outcomes Framework has gone some way to developing a shared understanding of outcomes achieved between providers of services and local authorities. The outcomes framework was developed collaboratively with providers, frontline workers, and local authorities and is a positive step forward in helping to build shared understanding of the outcomes delivered by services.

However, to date, no national synthesis of this information that would allow us to understand progress has been published. Coupled with efforts to better understand housing needs, data on outcomes will help us assess the progress we are making.

As evidenced elsewhere in our response, services are already under intense pressure, and it is important to strike a balance between reporting on meaningful outcomes that drive service improvement and protecting front-line workers' time to provide much needed support.

What services should be commissioned in the future to effectively support people with complex needs to find and keep a home?

As a starting point, we need an improved national understanding of housing need to ensure that commissioned services can respond effectively.

Our most recent Housing Matters report with Cymorth Cymru gathered perspectives from services about the changing nature of housing support needs. The evidence we have collected from support providers demonstrates that demand for homelessness

and housing support services has increased over the last year, as well as the complexity of people's support needs:

- 91% said demand for their services had increased since last year
- 94% said the complexity of support needs had increased since last year

We believe a focused discussion is needed on how services need to adapt - and be supported to do so - to meet the ambitions set out in the Expert Review Panel's report and effectively respond to the increase in complex needs.

As a guiding principle, our members believe it needs to be as easy as possible for people to get the support they need to sustain a tenancy, with more floating support services, flexible thresholds, and support provided for as long as needed. Ingredients for these services include:

- Increased staff capacity that allows front-line staff to work flexibly with people as their needs change
- Strengthened partnerships with wider public services, as recommended by the Expert Review Panel, to respond effectively to complex needs, in particular mental health needs
- Investment in front-line workers' ongoing training and support, to ensure they are supported to develop the skills required to meet complex needs
- Continued investment in fair pay for front-line workers.
- Bespoke specialist accommodation for vulnerable people to live independently.
- Supported accommodation with ongoing support.

In particular, our members called for more flexible and adaptable services, brought directly to a person's home. It is thought this is where the biggest strides could be made to support the transition to rapid rehousing and ensure people are supported to live well in their new homes. In addition to this, specialist services for specific groups of people should be considered, including families, 16 & 17-year-olds, and care leavers.



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John Griffiths
Local Government and Housing Committee
Welsh Parliament
Cardiff Bay
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CF99 1SN

Date: 07/02/2025

Dear Sirs,

Thank you for the opportunity to provide evidence to the Committee Inquiry on Housing Support for Vulnerable People.

Adra is an LSVT stock transfer organisation and we are the largest housing association in north Wales with 7000 homes, 16000 occupiers and 400 staff.

We operate across urban, rural and coastal areas covering 5 Counties providing good quality affordable homes and we have an ambitious new build programme of 800 new homes at pace. We have high levels of customer satisfaction and trust amongst our partners, stakeholders and tenants. As well as providing homes, we are keen to maximise social value through all our activity. We provide high levels of support to help individuals and communities with independent living, regeneration, employment and skills, health and wellbeing and financial hardship etc etc.

We are pleased to hear that the Inquiry is considering Housing Support for Vulnerable People and in particular the Housing Support Grant (HSG).

We have participated in the sector response via Community Housing Cymru (CHC) and given the importance of these services to vulnerable people we wanted to provide an individual response as well. For ease of reference, we have summarised our points under each of the 4 specific questions from the Committee.

1. **How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill**

This is probably one of the most difficult questions to answer, despite being part of the working groups developing this new legislation there is a lack of clarity about what this will mean in practice. We have observed consistently that points made by both the local authorities and housing associations have not been taken on board and it is unclear what the changes will mean in practice as no drafts have been shared. We have concerns about the rushed nature of the Bill and the impact of this on issues such as unfunded financial demands and migration to Wales for more favourable access to housing. This will put



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further cost and capacity pressures on the Local Authorities, Landlords, the NHS and Police etc. There are also concerns about the impact on safeguarding, Welsh language and ultimately community cohesion. This would be more pronounced in rural areas.

We know from experience with new legislation there are unintended consequences and we would ask Welsh Government to delay the implementation of the Homeless Bill so that organisations can properly assess the impact once the Bill is drafted and allow time to properly co-design effective new policy and legislation.

2. Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce;

The main pressures on HSG funded support services are the short term nature of the funding, particularly for smaller organisation who can only provide short term contracts. Also the increasingly complex issues including mental health, alcohol, substance misuse, complex disabilities, the funding gap to ensure services can be sustained. Recruitment and retention is an issue, more so for small charities who do incredible work. There is a high staff turnover given the short term nature of the funding, ability to pay competitive/comparable salaries and high levels of stress and trauma for staff dealing with increasingly complex caseloads. There are clear capacity issues within other organisations e.g. NHS and Police to provide essential support and the Homeless Bill appears to extend responsibilities to those already stretched organisations. The time to access mental health services for those in crisis is the biggest concern and we know that prevention and early intervention are far more effective solutions. The expression 'left holding the baby' is an often used phrase by dedicated housing professionals who know their client needs the support of more specialist services who cannot respond due to the level of demand.

3. How much is known about service performance, including data on outcomes;

We know from our own customer service data and feedback, that there are very high levels of customer satisfaction and trust amongst our clients therefore we are confident we are providing excellent services. The data that is collected to report national outcomes is time consuming to collect and there is no feedback at all on this data that is submitted. Our staff question the purpose and value of this exercise.

A large amount of preventive programs are funded through HSG, and therefore deal with "up-stream" rather than "down-stream" problems. This makes better use of resources and enables organisations to intervene early in supporting vulnerable people. We would like to see that there is a clear commitment from Welsh Government to use HSG to support preventative work to avoid the situation where problems escalate and become terribly costly. It is also important that HSG can be used to fund priorities that are identified at a local level



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4. How effective is joint working between housing support services and public services such as health and social care;

There are lots of examples of very effective joint working between housing support and public services. Adra are working with a number of Adults and Children's Social Care Services to review how we can make best use of resources and co-design services around prevention and early intervention. Our Academi Adra and Gwynedd Council Academi Gofal (care) are great examples of how we are tailoring bespoke employment and skills courses for roles supporting vulnerable people. Staff who work in this area have high levels of empathy and want to do their very best for clients. However, we can see the pressures our own staff and partner colleagues are facing. There is a huge mismatch between the demand for service, the complexity of issues being faced by clients and public services capacity to respond. We see this particularly with services such as adaptations where there are increasingly complex needs amongst children. These services provide a great example of an invest to save business case. However, the funding available does not in any way meet the level of new demand. Another example of joint working between Adra and Betsi Cadwallader Health Board where accommodation has been provided for international nurses to meet short term skills gaps. Housing Associations are well placed to provide bespoke accommodation solutions for staff and clients.

5. What services should be commissioned in future to effectively support people with complex needs to find and keep a home.

We would ask that any commissioning of services does not impact negatively on existing services and that any change is kept to a pace that can change can be managed effectively. Also, the importance of partnership working and early intervention. We are proud of our track record of supporting tenants to find and keep a home. Like many landlords we no longer carry out evictions and work hard to overcome any issues faced by our tenants. Our particular concerns is that independent living services for older people will lose funding and this will inevitably lead to failure demand and increased costs for the NHS and Local Authorities. We would ask Welsh Government to ensure that new funding is made available for the homelessness support services. Further concerns are about the length of support available. This cannot stop when keys to a property are handed over. Tenancy support is crucial for many to sustain their tenancy and avoid repeat homelessness. It is important that increased funding is made available for adaptations and suitable housing to meet the needs of children with complex disabilities. Alcohol and Substance Misuse services, Mental Health support particularly for people in crisis and people facing the trauma of Domestic Abuse and Sexual Assault. This is the core purpose of HSG, early intervention and prevention in turn reduces pressure on homelessness services. We are concerned that new approaches could lead to funding only being made available at crisis point thereby leading to more crisis points.

Thank you for taking the time to consider Adra's individual response. We are fully committed to working with Welsh Government to overcome these significant challenges. We note the that you will also be



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holding a day of oral evidence sessions and we would be delighted to participate in that important debate. Please do not hesitate to contact ourselves at Adra if there is anything more we can do to assist.

Yn Gywir/Yours sincerely,

Sarah Schofield

Sarah Schofield
Cyfarwyddwr Cwsmeriaid a Chymunedau
Director of Customers and Communities



Call for written evidence: Housing for vulnerable people

Response from Housing Services, Isle of Anglesey County Council

The Welsh Parliament's [Local Government and Housing Committee](#) is holding an inquiry into [housing for vulnerable people](#), with an initial focus on housing-related support services, funded by the Housing Support Grant.

Terms of Reference

The Committee will be looking to examine:

- **How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill;**

The Welsh Government's expectations of local authorities are made clear through the requirement to have in place a housing support grant strategy and rapid rehousing scheme. The Welsh Government aims to collaborate to prevent homelessness and ensure, in instances when it is not possible to prevent homelessness, that it is brief, rare and unrepeated. Changes to rapid rehousing and the homelessness Bill present opportunities and challenges for the housing support grant (HSG). Although the strategic direction aligns with homelessness prevention and the provision of long-term housing solutions, concerns remain regarding the sufficiency of HSG funding to meet increasing demand.

The Welsh Government has ensured that housing support grant guidance is aligned with these requirements and that the grant funds services that prevent or help to tackle homelessness. A major challenge is to ensure that short-term support services remain viable while investing in preventative models that are housing-led in the long term.

The proposed homelessness Bill will place local authorities under a great deal of pressure as they will be expected to support everyone without taking into consideration whether a person has intentionally made their situation worse. Local authorities want to help everyone, and constantly seek opportunities to do so, but there will be financial and resource implications if there is an expectation that support can be offered to all. This will also place the housing support grant under increased pressure due to an increase in the number of those requiring support.

Cymorth Cymru can attest to the fact that every £1 spent through HSG saves £1.40 for other public services. The Welsh Government should ensure a sustainable funding model that allows flexibility in terms of service provision.

- **Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce;**

The pressure on the workforce is increasing in terms of the number and complexity of clients that need to access services. Intensive support needs: an increasing number of service users present with complex needs, including mental health issues, substance abuse and neurodivergence, which call for more specialist interventions that are not currently covered

by current funding structures. This increases the depth of support needed, which impacts on individual HSG allocations and leads to extended periods of involvement.

While the Welsh Government has been able to maintain and increase the level of the grant, this does not reflect the true costs that providers face in terms of meeting service costs and paying a fair wage to workers.

We welcome the three-year funding cycle that has been in place, but we need certainty that this will continue so that we can commission services with a guarantee that funding will be provided.

There has been some coverage recently that the increase in HSG does not reflect the true cost of providing services:

[Charities facing National Insurance hike have 'nowhere left to cut' - BBC News](#)
[Homelessness charities warn National Insurance changes could take £60m away from frontline services | News | Housing Today](#)

[Cymorth Cymru](#) has published a report on the impact of HSG and the need to increase funding.

Workforce challenges: issues of staff burnout and retention are being exacerbated due to onerous caseloads, emotional demands and insufficient remuneration within the sector. A workforce-development strategy is urgently needed, along with enhanced training opportunities and sustainable remuneration strategies, to ensure that services continue to be provided. The matter of recruitment and maintaining an experienced, high-quality workforce is increasingly proving to be a challenge, with other sectors able to attract staff on better terms and conditions working in roles that are less pressured.

The 'Right Care, Right Person' model introduced by the police service: there is a lack of clarity regarding who bears responsibility for individuals with complex needs, particularly those who require housing and health support / specialist social care. It is crucial to define lines of responsibility between housing support, health services and social care to avoid gaps in services and ensure that individuals receive the appropriate interventions.

- **How much is known about service performance, including data on outcomes;**

Local authorities report on HSG outputs on a six-monthly basis and provide detailed data on the numbers accessing services and the outputs delivered. On Anglesey, we also gather data on satisfaction levels via an online survey. Feedback and comments are used by providers to improve their services and assist with the design and commissioning of services.

Through our 'single point of access' process for HSG, we measure the number of people accessing services, what services they require and the output of these services.

We convene a Providers' Forum and share information on outputs and outcomes on a regular basis. We also review services and report back to providers on their achievements.

A report on the housing support grant's impact was published in 2020
[Evidencing-the-Impact-of-HSG-ENG.pdf](#)

Although the outcomes data are gathered through the results framework, there is room for improvement, including:

Understanding the long-term success of the outcomes.

Integration with other sources of data, linking with health, social care and justice data to assess the wider impact of housing support interventions.

- **How effective is joint working between housing support services and public services such as health and social care;**

We work hard to foster and maintain links with other public services to ensure that they understand and contribute to homelessness prevention.

A partner event was recently held on Anglesey to raise awareness of the relevant issues and the way that we are collaborating on the island. Here is a copy of the agenda:



Housing
Homelessness Partn

There is a great deal of work still to be done to improve relationships and to encourage services to collaborate to prevent homelessness.

On Anglesey, we have an example of good practice in our Complex Cases Co-ordinator, and we have seen significant improvement since this role was introduced, as it has led the provision of housing-related support in complex cases involving vulnerable individuals, either those who are at risk of becoming homeless or those who have been placed in emergency and/or temporary accommodation. The co-ordination of these cases by convening multi-disciplinary meetings (which are increasing) also highlights the pressures faced by HSG services and the associated workforce.

Improvement could be made by developing integrated funding methods that encourage joint commissioning across housing, health and social care.

More work could be done to ensure that health and social care services are accountable for their role in supporting individuals with housing needs to challenge the perception that 'Housing is everyone's problem, but nobody's responsibility!'

We are currently strengthening multi-agency protocols to provide clear pathways between services; for example, a discharge pathway for hospitals to prevent homelessness after discharge.

The rapid rehousing agenda has contributed to an emphasis on partnership working.

- **What services should be commissioned in future to effectively support people with complex needs to find and keep a home.**

Local authorities should be able to commission the services they need according to the needs assessment. Local authorities should receive the funding they need to commission the right level of services according to need. There is a risk that a lack of investment will

mean that providers decide not to provide services due to salary costs and overheads, leaving local authorities to deal with higher levels of homelessness and complex cases.

Specialist support services should be expanded, particularly services for those facing mental health or substance misuse challenges.

Trauma-based models of support that focus on the individual and that recognise the long-term engagement required to provide stability should be expanded.

Preventative approaches should be strengthened, including early intervention targeted at individuals who are at risk of homelessness.

Move-on pathways should be improved to ensure that individuals do not remain in temporary supported accommodation due to a lack of appropriate alternative housing options.

An holistic approach, led by the individual, supported by sufficient and flexible funding, is vital to the provision of effective support services related to housing under the HSG framework.

The Committee would be very keen to hear your views and would be grateful if you could provide written evidence by **Friday 7 February 2025**. Further information on how to provide written evidence can be found [here](#).

Written Response from Powys County Council

Subject: Housing Support Grant (HSG) and Homelessness Prevention

1. Effectiveness of Welsh Government Planning for HSG in Light of Rapid Rehousing Transition and the Forthcoming Homelessness Bill:

1.1 Strategic Frameworks: The Welsh Government has developed a comprehensive strategy for rapid rehousing, aiming to make homelessness rare, brief, and non-repeated. This strategy includes ensuring that people move into settled homes as quickly as possible and receive the necessary support to maintain their tenancies. The strategy is detailed in the "Rapid Rehousing: guidance" document, from which Powys, along with local authorities across Wales, has produced its Rapid Re-Housing Transition Plan that outlines the principles and practices for implementing rapid rehousing in Powys; and indeed, across Wales in the case of Welsh local authorities as a collective. The requirement for local authorities to produce a four yearly Housing Support Programme Strategy that brings together both statutory provision for housing and homelessness and non-statutory instruments in the form of support delivered through the Housing Support Grant funded services, has been effective in aligning all housing and homelessness provision under the umbrella of one strategic document and action plan.

1.2 Policy Adjustments: The forthcoming Homelessness Bill is expected to further support these efforts by providing a legislative framework that prioritizes rapid rehousing and integrates it with other housing and support services. This legislative support is crucial for ensuring that rapid rehousing becomes the default approach for addressing homelessness, reducing reliance on temporary accommodation. Care will however need to be taken in framing any future homelessness legislation and guidance to secure an equitable balance between those who are homeless and those who have an equally intense and urgent need for a home or accommodation that is better able to help them manage and improve their well-being.

1.3 Stakeholder Engagement: Continuous engagement with stakeholders, including local authorities, support providers, and community organizations, is crucial for refining and implementing these plans effectively. The Welsh Government's six weekly Legislative Reform engagement meetings have been useful at involving housing and homelessness stakeholders, including HSG leads, across all local authorities and shown the Welsh Government's intent to consult and collaborate in planning sessions to ensure that the strategies are practical and address the real needs of those experiencing homelessness. Strengthening the responsibilities and duties of all housing providers, including critically housing associations, to provide homes for those who are vulnerable or who are homeless, will be critical to the success of all our efforts to improve the housing of vulnerable households. The forthcoming Homeless Bill is a timely opportunity for the Welsh Government to enhance the duties and responsibilities of housing associations to proactively support local housing authorities in resolving homelessness and helping vulnerable people have a place they can call home.,

1.4 Resource Allocation: Between 2021 and 2024, local authorities have been allowed to use a portion of their Housing Support Grant allocation to fund short-term project management and strategic planning resources to support the delivery of rapid rehousing. This allocation demonstrates the Welsh Government's commitment to providing the necessary resources for effective implementation. As will be expanded upon later, commitments to future funding have reverted from a three-year indicative allocation of Housing Support Grant, back to a one-year

indicative allocation which is a retrograde step in terms of future resource planning. That said, the integration of the whole of the Homelessness Prevention Grant and Bond Scheme funding into the HSG, and indicative uplifts to assist the third sector to achieve the real living wage in a period of economic uncertainty, have highlighted the importance the WG has placed on the HSG as the key non-statutory funding vehicle for homelessness prevention commissioning and procurement.

1.5 Monitoring and Evaluation: The Welsh Government has revised and refreshed the HSG Outcomes Framework that monitors and evaluates the performance of HSG-funded services. In addition, review of HSG Delivery Plans, commissioning intentions and the implementation of WG Relationship Managers who liaise closely with local authority housing managers and HSG leads has been an effective way to monitor and evaluate service delivery and exchange ideas.

2. Current and Anticipated Pressures in the Delivery of HSG-Funded Support Services:

2.1 Funding Constraints: Prior to the Covid 19 pandemic, the Housing Support Grant went through several real-term budget cuts, putting significant pressure on service delivery. The cost of delivering these services has continually increased, leading to challenges in maintaining current service levels. The reasons for the increased costs can be encapsulated as follows:

Increased Cost of Living: The overall cost of living has risen, including higher prices for essentials like food, utilities, and transportation. This impacts both the operational costs of support services and the living expenses of those they support.

Rising Property Prices and Rent: Property prices and rental rates have increased significantly in many areas, making it more expensive to secure housing for those in need. This also affects the cost of maintaining existing properties.

Higher Demand for Services: There has been an increase in the number of people requiring housing-related support, partly due to economic challenges and the ongoing effects of the COVID-19 pandemic. This higher demand puts additional strain on resources.

Funding Cuts: Many support services have faced reductions in funding over the years, which means they must do more with less. This has led to increased costs as they try to maintain the same level of service with fewer resources.

Complex Needs of Clients: The individuals requiring housing support often have more complex needs, such as mental health issues or substance use disorders. Providing comprehensive support for these needs requires more specialized staff and resources.

Regulatory and Compliance Costs: There continual addition of new regulations and compliance requirements that support services must adhere to increase administrative costs and the need for additional training and resources.

The increased allocations of HSG during and following the pandemic were a welcome recognition of the increased demands on housing and homelessness services and support provider organisations across the third sector; however, demand continues to outstrip funding allocation levels. The Welsh Government's decision to provide only a yearly indicative allocation of the Housing Support Grant in 2025-26 significantly hampers efforts to effectively plan for the future prevention of homelessness. This short-term funding approach creates a range of challenges that undermine the stability and effectiveness of homelessness prevention strategies.

Overall, the Welsh Government's current funding approach not only disrupts the planning and implementation of effective homelessness prevention strategies but also sends a message of instability and short-term thinking. For a more robust and sustainable approach, it is essential to move towards multi-year funding allocations that provide the necessary stability for strategic planning, staff retention, service procurement, and data-driven decision-making. This shift would enable organizations to build stronger relationships, foster innovation, and ultimately make a more significant impact on preventing homelessness in Wales.

2.2 Workforce Challenges: There are concerns about the wages and working conditions of support workers, which do not always reflect the expertise required to be a support worker. This has led to difficulties in recruiting and retaining skilled staff in Powys. Firstly, the inability to plan beyond a single year sends a discouraging message to staff. Without the assurance of long-term funding, it becomes difficult to develop and implement comprehensive strategies aimed at reducing homelessness. Staff are left in a state of uncertainty, unable to commit to long-term goals or innovative approaches that require time to develop and yield results. This uncertainty further impacts recruitment and retention, as potential and current employees may seek more stable opportunities elsewhere, leading to a loss of experienced and dedicated personnel. Even though many HSG commissioned and procured service contracts are multi-year, they do always have to be caveated on the basis that they will continue only as long as the yearly indicative funding is in place otherwise the contracts will be discontinued. Hence the messaging tends to be couched in uncertainty.

2.3 Increasing Demand: The rising number of people experiencing or at risk of homelessness – the result of lack of housing available that people can afford to buy or rent, and in the case of the latter the continued use by private landlords of non-secure Standard Contracts, has increased the demand for support services, exacerbating existing pressures.

In spite of there being a strong and growing new development programme in Powys for Council housing and homes developed by housing associations, too many vulnerable households are still compelled to rent accommodation in the private sector. Privately rented accommodation is still predominantly let on Standard Contracts, that includes the risk of 'no fault' evictions, at rents considerably higher than Local Housing Allowance and the rents offered by the Council and housing associations.

Private landlords in some cases have reacted adversely to the legislation, introduced by the Renting Homes (Wales) Act to strengthen and improve the rights of tenants, and opted out of this line of business. Not all properties have remained in the rental market, with some being bought by homeowners but others by Air BnB type operators. This means that while options for home ownership – especially at the entry level of the housing market – may have increased, there may be fewer privately rented accommodation for those who cannot buy or be able to secure social housing.

To give vulnerable people a place they can truly call home, the most pressing need is for a net increase in the total number of homes available in Powys, with rented housing being best provided by social landlords willing and able to offer secure contracts, homes maintained to the Welsh Housing Quality Standard and genuinely affordable rents.

Demand for housing in Powys, especially for those with low to medium incomes and those who are vulnerable, far outstrips supply.

3. Knowledge About Service Performance, Including Data on Outcomes:

3.1 Outcomes Framework: The Welsh Government's continued implementation of an HSG Outcomes Framework to monitor and evaluate the performance of HSG-funded services, is a fairly useful baseline for capturing data on the effectiveness of these services in achieving their goals. The lack of long-term indicative funding runs counter to the fact that the outcomes data suggests that homelessness is an issue that needs to be funded for the long term to be effective. Longitudinal data is vital for understanding trends, measuring the impact of interventions, and making informed decisions. Without the stability of multi-year funding, data collection efforts are fragmented, making it difficult to draw meaningful conclusions and adapt strategies based on evidence.

3.2 Data Collection: Local authorities and service providers are required to submit regular data returns, which include both primary and secondary outcomes. This data is used to assess the impact of support services and inform future planning. There is quite a robust process for ensuring accountability for HSG funding however the data collection process is not unduly onerous.

4. Effectiveness of Joint Working Between Housing Support Services and Public Services:

4.1 Collaboration Models: Effective joint working often involves multi-agency collaboration, where housing support services work closely with health and social care providers to deliver integrated support. This can include shared case management and coordinated service delivery. Powys has worked to develop closer working between our main floating support provider services funded by HSG and local authority housing teams to improve the 'move on' of people from temporary into settled accommodation. There have been pockets of success but recruitment challenges in certain localities in Powys reflect the necessity for wage levels in the sector to increase to attract people into the housing support market.

4.2 Challenges and Successes: While there are successful examples of collaboration, such as joint agreements over which services will focus on temporary accommodation support and which ones will focus on Housing First delivery for example, there continue to be challenges as well. These challenges may include issues such as differing organizational cultures and priorities and funding streams that can hinder joint working. The rurality of Powys is a challenge in terms of relevance of public transport for many journeys, which creates sustainability pressures as higher staff mileage is incurred to meet support needs across localities. Collaboration is therefore key to sharing resources wherever possible.

Insufficient funding of statutory Health and Social Care Services and local authority Housing Services in Powys means that non-statutory preventative services must be better funded and provided to prevent low level needs escalating to crisis. The reliance on HSG to bridge the gap between statutory services and non-statutory provision cannot be overstated. Ensuring that gaps in Statutory Health and Social Care funding aren't met by HSG in a way that breaches HSG guidance remains an ongoing challenge.

Maintaining and improving housing related support provision to prevent and reduce the risk and incidence of homelessness would benefit from creating a clearly defined task-based 'ring-

fence' to help make sure that HSG resources remain entirely focused on homeless prevention. This will clarify for all services and agencies what can and cannot be considered eligible for HSG and so limit the risk that HSG funding may be used for activity that does tangibly prevent and reduce homelessness.

5. Future Commissioning of Services to Support People with Complex Needs:

5.1 Integrated Support Services: Future commissioning funded by HSG will include a focus on integrated support services that address the diverse needs of individuals with complex needs. This includes combining housing support with health, mental health, and social care services. Unfortunately, the short-term indicative funding model complicates the procurement of services on a multi-year contractual basis. Multi-year contracts and the ability to develop strong, long-term in-house teams allows for the development of trust and collaboration, which are essential for effective service delivery. They also provide the time needed to embed innovative approaches and practices, ensuring that new methods are given a fair chance to prove their effectiveness. Continuity of funding is crucial – indeed, essential - for building strong working relationships with service providers and stakeholders.

Powys is actively looking for site or building opportunities to develop the Enhanced Homeless Services project - two Instant Access 24/7 Triage Centres, two Interim 24/7 Supported Housing Schemes and its own 'bed-and-breakfast' style Instant Accommodation scheme. The Triage Centres and the Interim Supported Housing schemes will also act as hubs in key localities that comprise complex needs support, health and social care support and will be closely aligned with HSG funded support services.

5.2 Person-Centred Approaches: HSG commissioned services should be tailored to the specific needs of individuals, providing flexible and responsive support that can adapt to changing circumstances. These are tried and tested approaches. However, one phenomenon that has been far more apparent in recent years and is a growing problem is the non-engagement of people who are offered support and the complexity of need they present with. Demand for 'Assertive Outreach' is increasing and will need the right level of investment in conjunction with earlier intervention to be able to prevent homelessness and trauma for households and individuals.

5.3 Innovative Models: Exploring and implementing innovative models of care, such as Housing First and Critical Time Interventions, can provide effective support for people with complex needs. However as stated already, the uncertainty surrounding yearly allocations can lead to a reactive rather than proactive approach to homelessness prevention. Organizations may find themselves constantly adjusting to funding changes rather than focusing on long-term solutions. This reactive stance can result in inefficiencies and missed opportunities to address the root causes of homelessness.

Summary:

Powys County Council acknowledges the Welsh Government's efforts in planning for the future of the Housing Support Grant (HSG) through strategic frameworks, policy adjustments, and stakeholder engagement. However, current and anticipated pressures, including funding constraints, workforce challenges, and increasing demand, pose significant challenges. The

Outcomes Framework and data collection efforts are crucial for assessing service performance. Effective joint working between third sector housing support services and public services is essential, though it faces challenges. Future commissioning should focus on integrated support services, person-centred approaches, and innovative models to effectively support people with complex needs.

Key Statistics:

- In 2022-2023, HSG-funded services helped prevent homelessness for over 20,000 households in Wales.
- 35% of those supported by HSG services were individuals with mental health issues, and 25% were experiencing domestic abuse.
- Every £1 invested in housing support services saves £1.68 in public spending by reducing the need for more costly crisis interventions.
- According to the HSG Outcomes Framework, 85% of service users reported improved well-being and stability in their housing situation after receiving support.
- Joint working between housing support services and health services has led to a 30% reduction in hospital admissions among service users.
- In 2022, 40% of housing support providers reported difficulties in recruiting and retaining staff due to funding uncertainties.
- The number of households assessed as homeless and owed a duty to help secure accommodation increased by 7% to 12,537 in 2022-2023.
- The number of households in temporary accommodation rose by 23% to 5,481 as of March 2023, the highest figure since the legislation was introduced in April 2015.

These statistics highlight the significant impact and value of the Housing Support Grant in Wales, underscoring the importance of continued and increased funding to sustain and enhance these vital services.

References

[1] [Rapid Rehousing: guidance - GOV.WALES](#)

[2] [Housing Support Grant Guidance - GOV.WALES](#)

[3] [Developing a Rapid Rehousing Transition Plan 2022 to 2027 - GOV.WALES](#)

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