Agenda – Public Accounts Committee

Meeting Venue:	For further information contact:
Committee Room 3 – Senedd	**Fay Bowen**
Meeting date: 15 January 2018	Committee Clerk
Meeting time: 13.45	0300 200 6565
	SeneddPAC@assembly.wales

(Private Pre-Meeting)

(13.45 – 14.00)

1 Introductions, apologies, substitutions and declarations of interest

(14.00)

2 Paper(s) to note

(14.00 – 14.15)   (Pages 1 – 4)

2.1 Auditor General for Wales Report: Central Government Accounts 2016 –17

(Pages 5 – 34)

2.2 Auditor General for Wales Report: Local Government Homelessness 2017

(Pages 35 – 135)

2.3 Public Procurement: Welsh Government response to the Auditor General's Report

(Pages 136 – 139)

2.4 Implementation of the NHS Finance (Wales) Act 2014: Additional information from the Welsh Government (22 December 2017)

(Pages 140 – 141)

2.5 Hospital Catering and Patient Nutrition: Additional information from the Welsh Government (3 January 2018)

(Pages 142 – 143)

3 Community Safety in Wales

(14.15 – 14.30)   (Pages 144 – 229)

Cynulliad Cenedlaethol Cymru
National Assembly for Wales

PAC(5)-01-18 Paper 1 – Letter from the Welsh Government (6 December 2017)

PAC(5)-01-18 Paper 2 – Welsh Government Report – Working Together for Safer Communities) (Published 12 December 2017)

PAC(5)-01-18 Paper 3 – Welsh Government Oral Statement – Working Together for Safer Communities (Published 12 December 2017)

4 Introductory Session with new Director Generals, Welsh Government

(14.30 – 15.30)   (Pages 230 – 243)

Research Briefing

Tracey Burke – Director General, Education and Public Services

Andrew Slade – Director General, Economy, Skills and Natural Resources

5 Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for the following business:

(15.30)

Items 6 & 7

6 Scrutiny of Accounts 2016-17: Consideration of the draft report

(15.30 – 16.15)   (Pages 244 – 279)

PAC(5)-01-18 Paper 4 – Draft report

7 Current Work Programme

(16.15 – 17.00)   (Pages 280 – 292)

PAC(5)-01-18 Paper 5 – Spring 2018 work programme

PAC(5)-01-18 Paper 6 – Funding for film and media industries

8 The Welsh Government's Supporting People Programme: Consultation Responses

Concise Minutes – Public Accounts Committee

Meeting Venue:	This meeting can be viewed
Committee Room 3 – Senedd	on Senedd TV at:
Meeting date: Monday, 11 December 2017	http://senedd.tv/en/4357
Meeting time: 14.01 – 15.55	

Attendance

Category	Names
Assembly Members:	Nick Ramsay AM (Chair)
	Neil Hamilton AM
	Vikki Howells AM
	Rhianon Passmore AM
	Adam Price AM
	Lee Waters AM
Witnesses:	Mark Child, Western Bay Regional Collaborative Committee
	Rachel Evans, Western Bay Regional Collaborative Committee
Wales Audit Office:	Huw Vaughan Thomas – Auditor General for Wales
	Matthew Mortlock
Committee Staff:	Fay Bowen (Clerk)
	Claire Griffiths (Deputy Clerk)
	Katie Wyatt (Legal Adviser)

Cynulliad Cenedlaethol Cymru
National Assembly for Wales

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1 Introductions, apologies, substitutions and declarations of interest

1.1 The Chair welcomed the Members to the meeting.

1.2 Apologies were received from Mohammad Asghar AM. There was no substitute.

2 Paper(s) to note

2.1 The papers were noted.

- On coastal flooding, the Chair agreed to write to the Welsh Government seeking an update on their timetable for the Coastal Risk Management Programme and advise the Chair of the Climate Change, Environment and Rural Affairs Committee of the coastal toolkit to accompany the new Strategy for Flood and Coastal Erosion Risk Management with regard to realignment.

- Regarding the correspondence between the Committee and the Welsh Government on working practices and procedures, Members felt that the response was positive but that close monitoring would be required to ensure that Welsh Government responses to Committee recommendations consistently provide full explanations of why a recommendation has been accepted or not. The Chair agreed to respond to the Permanent Secretary with the Committee's views.

2.1 Coastal flood and erosion risk management in Wales: Additional information from the Welsh Government (20 November 2017)

2.2 Inquiry into Regulatory oversight of Housing Associations: Additional information from the Welsh Government (21 November 2017)

2.3 Committee working practices and procedures: Correspondence between the Committee and the Welsh Government

2.4 Audit of Cardiff and Vale University Health Board's Contractual Relationships with RKC Associates Ltd and its Owner: Additional information from the Welsh Government (24 November 2017)

2.5 Audit of Cardiff and Vale University Health Board's Contractual Relationships with RKC Associates Ltd and its Owner: Additional information from Cardiff and Vale

2.6   Natural Resources Wales Scrutiny of Accounts 2015–16: Additional information

from Natural Resources Wales (29 November 2017)

3   The Welsh Government's Supporting People Programme: Evidence Session 4

3.1 The Committee received evidence from Councillor Mark Child, Chair, Western Bay Regional Collaborative Committee and Rachel Evans, Supporting People Lead, City and County of Swansea Co-ordinating Authority as part of its inquiry into The Welsh Government's Supporting People Programme.

4   Motion under Standing Order 17.42 to resolve to exclude the public from the meeting for the following business:

4.1 The motion was agreed.

5   The Welsh Government's Supporting People Programme: Consideration of evidence received

5.1 Members considered the evidence received.

6   The 21st Century Schools and Education Programme: Consideration of update from the Welsh Government

6.1 Members noted the written update and agreed to undertake an inquiry during the summer 2018 term.

7   Public Procurement in Wales: Auditor General for Wales Reports

7.1 The Committee received a briefing on the Auditor General's Report on the National Procurement Service which was published on 30 November. Members had already agreed to undertake an inquiry into Public Procurement following publication of his earlier report on Public Procurement – Landscape Review on 23 October.

7.2 Members noted that evidence sessions will be scheduled for the spring 2018 term.

8 The Governance Challenges posed by indirectly provided, publicly funded services in Wales: Oral Update from the Auditor General for Wales

8.1 The Auditor General gave an oral update on his discussion paper which was published in February 2017 and considered by Committee during its meeting on 6 March 2017.

8.2 Members agreed that the Chair should write to the Permanent Secretary seeking an update on progress made in respect of the relationship between the Welsh Government and arm's length companies.

Archwilydd Cyffredinol Cymru
Auditor General for Wales

2016-17 Central Government Accounts

WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU

I have prepared and published this report in accordance
with the Government of Wales Act 1998.

The Wales Audit Office study team comprised Julie Rees and Clare James
under the direction of Richard Harries.

Huw Vaughan Thomas
Auditor General for Wales
Wales Audit Office
24 Cathedral Road
Cardiff
CF11 9LJ

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Summary report

Summary

1   This is my second annual report on my audits of the financial statements of central government bodies. It summarises the results of my audit work for 2016-17 completed at central government bodies in Wales, as set out in Exhibit 1.

Central government bodies

Exhibit 1 – Central government bodies in Wales
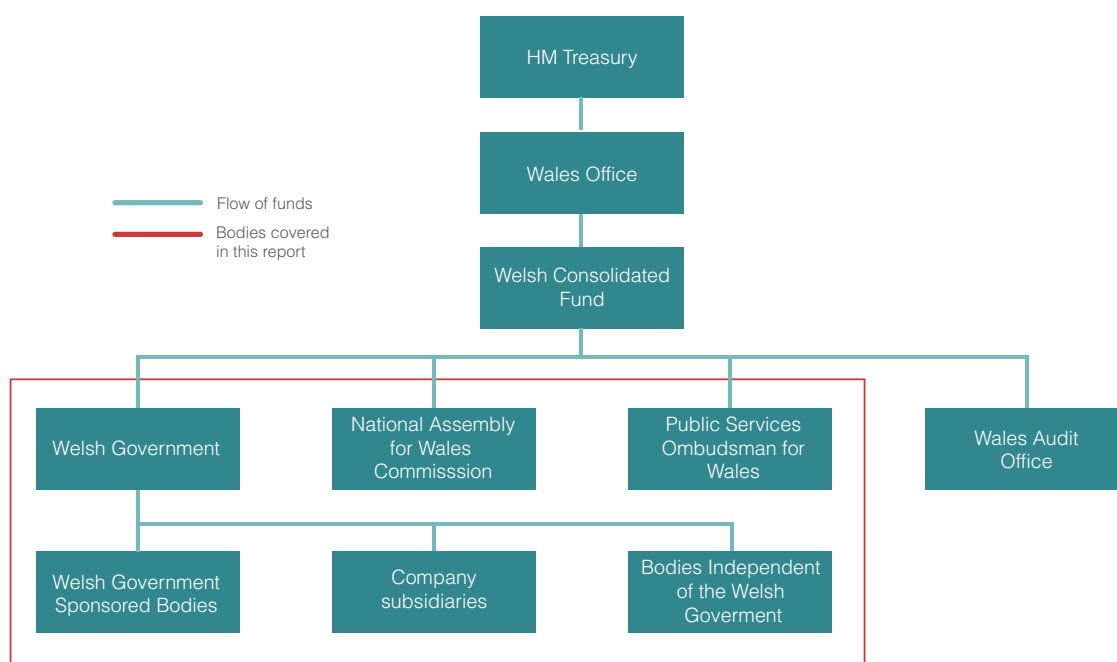
2   This report covers those 24 bodies falling within the 'red box' in Exhibit 1 which are audited by the Auditor General for Wales. The 24 bodies are listed in detail in Appendix 1.

3   Central government bodies (audited bodies) in Wales provide a vast range of services, and in doing so, spend a significant amount of public money. Like all public bodies, they are required to produce, and have audited, a set of annual financial statements (accounts) to demonstrate and report on the stewardship of the public funds entrusted to them, and they are held accountable for doing so.

4   All the audited bodies must use their funding for the purposes intended and within the powers and duties that specifically apply to them. However, as shown in Exhibit 1, three of the audited bodies[1] receive their funding directly from the Welsh Consolidated Fund, and so are required to submit a budget estimate to the National Assembly for Wales (the National Assembly) and are accountable to the National Assembly for the use of that funding, which requires that:

   a   a sum provided for a particular service may not be used to provide another service;

   b   expenditure must not exceed the approved budget; and

   c   amounts provided are for that financial year only and unused funds must be ordinarily surrendered back at the year-end.

5   Producing accurate and timely accounts is a significant task but is necessary to demonstrate accountability for the stewardship and governance of public funds. Failing to publish such accounts in a timely manner can reflect badly on the audited body, undermining its financial management and corporate governance arrangements, as well as the overall confidence in the organisation.

6   The accounting and governance framework applicable to each central government body will be defined by its legal and regulatory framework, and to a lesser or greater extent by the additional requirements of its sponsoring group (the group within Welsh Government that provides oversight of the body; relevant to Welsh Government sponsored bodies and company subsidiaries, also known as arms-length bodies). Together these dictate the form and content of the financial statements and other reporting requirements such as their annual report and any deadlines for the audit and publication of these documents.

7   I welcome the review currently being undertaken by the Welsh Government of the arrangements governing its relationship with its arms-length bodies. The purpose of the review is to provide assurance to ministers and the Principal Accounting Officer that the Welsh Government has in place arrangements for the proportionate and effective oversight of its public bodies, to identify best practice and make recommendations for the most effective organisational structure for the management of public bodies and for determining, and reconsidering, when an arm's-length body is the most suitable method of delivering ministerial objectives.

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1   Welsh Government, National Assembly for Wales Commission, Public Services Ombudsman for Wales

8   Welsh Government's review is particularly timely in the context of the significant challenges facing central government bodies. Most notable is the continued downwards financial pressure on budgets, which alongside the changing legal and regulatory framework (new accounting requirements for charitable bodies, changes to Annual Reporting requirements for non-charitable bodies and the passing of the Well-being of Future Generations (Wales) Act 2015) keeps pressure on audited bodies to find ways of delivering more with less. Any improvement in the clarity and efficacy of support and guidance provided by Welsh Government to audited bodies will be welcomed.

My audit and reporting responsibilities

9   I am the statutory auditor for most of the audited bodies detailed in Appendix 1. For the remainder, I am auditor by agreement under paragraph 18(3) of Schedule 8 of the Government of Wales Act 2006.

10   I examine and certify each audited body's financial statements and satisfy myself that they:

- give a 'true and fair' view of the body's financial position;

- are 'properly prepared'; and

- do not contain expenditure or income transactions which have been incurred unlawfully or not in accordance with the authorities given ('irregular').

11   In undertaking this work, I do not seek to obtain absolute assurance on the truth, fairness and regularity of the financial statements and related notes, but adopt a concept of materiality. My aim is to identify material misstatements, that is, those that might result in a reader of the accounts being misled.

12   I am also required to report on a number of other issues, including the proper preparation of the Remuneration Report, and I also have the power to place a report alongside my certificate where I wish to draw the attention of readers to a particular issue. My responsibilities are set out in more detail in Appendix 2.

13   Following my audit of the 2016-17 central government accounts I concluded that overall the standard of the central government accounts and supporting working papers is good, although there remains scope to improve working papers and quality assurance arrangements in some instances. The Annual Reports are generally compliant with the relevant reporting frameworks but further work is also required to make them more succinct and engaging.

Detailed Report

All central government bodies submitted their accounts to audit on time and all audit opinions were issued by the required deadlines

14   Statutory deadlines for the production and audit of audited bodies' accounts vary from body to body. However, it is pleasing to report that:

- all those bodies with a stipulated date for production of accounts for audit, met those dates; and

- all those bodies with a stipulated date to receive their audit opinions received them by those dates.

15   For those bodies without such stipulated deadlines, I set a timeframe after receipt of draft accounts for my teams to complete their audit work and to issue my audit opinion. In all cases the deadlines were met.

The standard of draft accounts remains good but there is scope to improve the quality assurance arrangements adopted by bodies and raise standards further

16   The quality of the accounts submitted to audit in 2016-17 was generally considered to be good. Having robust quality assurance processes in place plays an important part in determining the quality of the accounts submitted to audit.

17   There was a marked increase in the number of bodies completing the relevant accounting disclosure checklist with sixteen of the 24 bodies now doing so, compared to ten in 2015-16 (Exhibit 2). The checklists are an important way for bodies to assess their accounts' compliance with the relevant accounting framework and to address any omissions prior to the start of the audit.

18   Quality assurances arrangements will be expected to vary from body to body, dependent in part on size and complexity. Exhibit 3 details examples of good quality assurance arrangements noted at audited bodies in 2016-17, which when taken together, form a robust quality assurance process.

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Exhibit 2 – percentage of audited bodies using accounts disclosure checklists
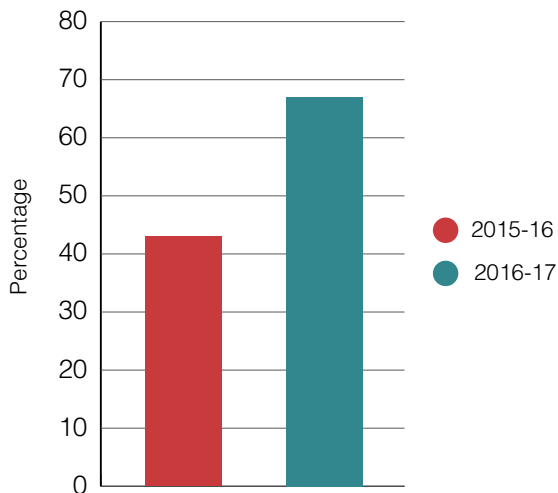
Source: Wales Audit Office analysis of data from audit teams

Exhibit 3 – Examples of robust accounts quality assurance arrangements

A table with narrative detailing examples of robust accounts quality assurance arrangements.

- A standard agenda item for meetings of those charged with governance to consider forthcoming accounting developments.

- The appropriate accounts disclosure checklist completed prior to the accounts being submitted to audit. The disclosure checklists are a valuable way to gain additional assurance over the quality of accounts and demonstrate compliance with relevant accounting standards.

- Draft accounts and working papers are subject to formal review by the Director of Finance/Head of Resources prior to submission to audit.

- Draft annual report and accounts are formally considered by those charged with governance prior to the audit, with a supporting report summarising the key points presented by the Director of Finance/Head of Resources to inform their review. This report on the accounts includes:

  - highlights key issues in the annual report and accounts;

  - provides explanations for significant year on year variances;

  - provides commentary on any exceptional items; and

  - reports the final out-turn position reported against the budget.

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19   In Appendix 3 I have included some of the key questions which those charged with governance may wish to consider when reviewing the Annual Accounts. These questions have been based on the National Audit Office's guide to Central Government Accounts which is an introductory guide for those with an oversight role. In the guide they pose key challenge questions for those with oversight to consider when reviewing accounts. The full guide: Understanding Central Government Accounts can be found on the National Audit Office (NAO) website.

Working papers provided to support the accounts were generally good with improvements reported at several audited bodies

20   In order to support the entries in the accounts, audited bodies should provide my auditors with a comprehensive and complete set of working papers in a timely manner. If working papers are incomplete, sub-standard or not provided promptly, it can lead to increased pressure on audited bodies' finance teams during the audit period and increase the risk that the accounts are not completed by the deadline.

21   The working papers to support accounts were generally reported to be of a good standard. In a small number of cases auditors reported that aspects of the quality, timeliness and accuracy of supporting working papers for the accounts needed improvement. Going forward, working paper requirements should be agreed with my auditors in advance to facilitate the timely completion of audit work

Material adjustments are made to draft accounts in over a quarter of audited bodies

22   As set out in paragraph 11 above, I do not seek to obtain absolute assurance on the truth, fairness and regularity of the financial statements and related notes, but adopt a concept of materiality – the level of misstatement which might mislead a reader of the accounts.

23   Materiality is a matter of professional judgement but is generally set between 1% and 2% of the level of expenditure. For certain items however, I will consider any misstatement to be material for example, remuneration of a senior officer (sensitive item); also where amendment would lead to exceeding the approved budget (specific regulatory requirements – see paragraph 4).

24   **Exhibit 4** shows for 2016-17 and 2015-16 the percentage of audited bodies with:

- material adjustments to draft accounts;

- unadjusted misstatements reported; and

- qualitative issues reported;

and are explained in detail below.

Exhibit 4 – matters reported in Audit of Financial Statements Reports
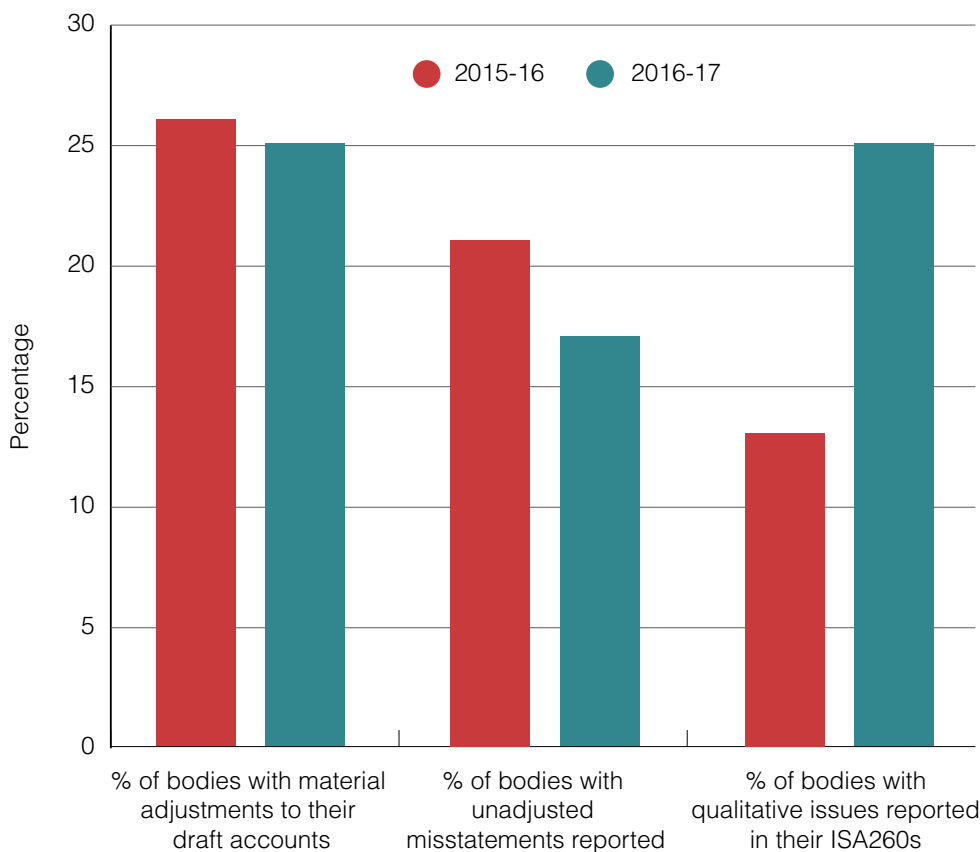
Source: Wales Audit Office analysis of data from audit teams

Material misstatements

25   When my auditors identify material misstatements, they will ask management to amend the accounts to correct the errors. If they are not corrected, or it is not possible to change them due to insufficient information, I will issue an appropriate qualified audit opinion.

26   As shown in Exhibit 4, in 2016-17, 25% of audited bodies made material adjustments to their accounts or remuneration report following the audit. This is marginally lower than the percentage as reported in 2015-16. Where material amendments are made, bodies should review the reasons why the errors occurred and ensure recommendations made by my auditors in respect of these errors are implemented. Bodies should also review their accounts production and quality assurance arrangements to ensure they are sufficiently robust to pick up such errors before the draft accounts are passed for audit. Two thirds of those bodies reporting material errors in their accounts had not completed the relevant accounts disclosure checklists, further highlighting how useful these can be in the quality assurance process.

Unadjusted misstatements and qualitative matters

27   When my auditors identify non-material misstatements, they are brought to the attention of management with a request for amendment or a written representation as to why no change will be made. Where such misstatements are not adjusted they do not result in a qualified audit opinion. They are reported to those charged with governance (usually the Audit Committee or equivalent) with a request to amend or an explanation as to why no amendment has been made.

28   It is pleasing to see that the level of unadjusted misstatements reported in 2016-17 fell compared to the previous year (Exhibit 4). Processing non-material adjustments is time consuming for both the audited bodies and my auditors. Although I want to see high quality accounts, I acknowledge that in the interests of streamlining the accounts and audit process and delivering on early closing, we might expect to see fewer corrections of identified non-material misstatements, and that this in itself does not necessarily indicate a drop in quality.

29   The areas where immaterial misstatements and other qualitative issues were identified in 2016-17 varied significantly. There were no specific themes across the bodies to report which given the varying nature of the work of central government bodies in Wales, is to be expected. Following each audit, detailed findings have been reported back to bodies in their Audit of Financial Statements Reports.

Unqualified audit opinions were issued on all accounts except for one audited body where the regularity opinion was qualified

30 As set out in Paragraph 10, on each audited body's accounts I must provide an opinion on whether they:

- give a 'true and fair' view of the body's financial position;

- are 'properly prepared'; and

- only contain expenditure or income transactions which have been incurred lawfully and in accordance with the authorities given ('regular').

31 All audited bodies' 2016-17 accounts were 'true and fair' and 'properly prepared', where material misstatements were identified (see paragraph 25-26 above), they were corrected.

32 With one exception, which I detail below, no audited body's accounts contained material irregular income or expenditure.

33 In 2015-16 I qualified my regularity opinion for one body and, in 2016-17, their regularity opinion was qualified on the same basis. While the financial statements of the body concerned gave a 'true and fair view', I concluded that the decision to agree a number of sales contracts did not follow the correct procedures. I was also unable to satisfy myself that the decision met other relevant rules and requirements. I therefore concluded that the correct and proportionate action to take was to qualify my regularity opinion[2].

34 Further explanations of the various opinions that I issue are included in Appendix 2.

2 Natural Resources Wales, Annual Report & Accounts 2016-17 (Page 52)

Annual Reports are increasingly compliant with their reporting requirements but work is needed to improve readability

35   Last year, in the context of new HM Treasury annual reporting requirements and Public Accounts Committee[3] recommendations to improve accessibility and readability of annual reports, including the use of diagrams and infographics for key data, I reported the findings of my high-level review of audited bodies' 2015-16 Annual Reports.

36   Findings were generally positive with reasonable levels of compliance and some good examples of engaging and readable annual reports. However, notwithstanding those examples, more work was needed to improve readability, eg reducing overall length and replacing narrative with infographics; and also to provide better reporting on performance and key risks.

37   This year my staff followed up their previous work by undertaking a light touch review of 2016-17 annual reports to check whether the compliance omissions in 2015-16 reports had been rectified (it has been assumed that previously compliant elements remain so in 2016-17) and whether there is greater use of diagrams and infographics in presenting information.

38   Our overall findings on compliance are set out in Exhibit 5 for the annual reports of the 15 audited bodies following HM Treasury's Financial Reporting Manual (FReM), and Exhibit 6 for annual reports of the three audited bodies following the Charity Commission's Statement of Reporting Practice (SoRP).

39   Overall compliance has improved for both FReM and SoRP reports. Individually almost all bodies increased their compliance score, a small number markedly so, with some now just marginally short of full compliance. It is also pleasing to note that almost 50% of the annual reports now make better use of infographics particularly in providing a 'snapshot' or summary of the year, and making presentational changes to highlight key issues.

40   There remain some individual bodies with more work to do, however I recognise that given limited resources, incremental movement in the right direction is a positive step, and encourage audited bodies to keep up the momentum.

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3   National Assembly for Wales Public Accounts Committee, **Scrutiny of Accounts, 2015-16**, December 2016

FReM Annual Reports

41 **Exhibit 5** shows compliance with the required FReM report elements:

- **Performance Report** – this should 'tell the story' of the body, including an overview and performance measures;

- **Accountability Report** – this should set out how well the body complies with stewardship and governance requirements and contains:

  - **Corporate Governance Report**;

  - **Remuneration and Staff Report**; and

  - **Parliamentary Accountability and Audit Report** (measured against mandated items only (2015-16 is re-stated).

Exhibit 5 – Annual Report compliance with FReM requirements

Source: Wales Audit Office review of 2015-16 and 2016-17 Annual Reports

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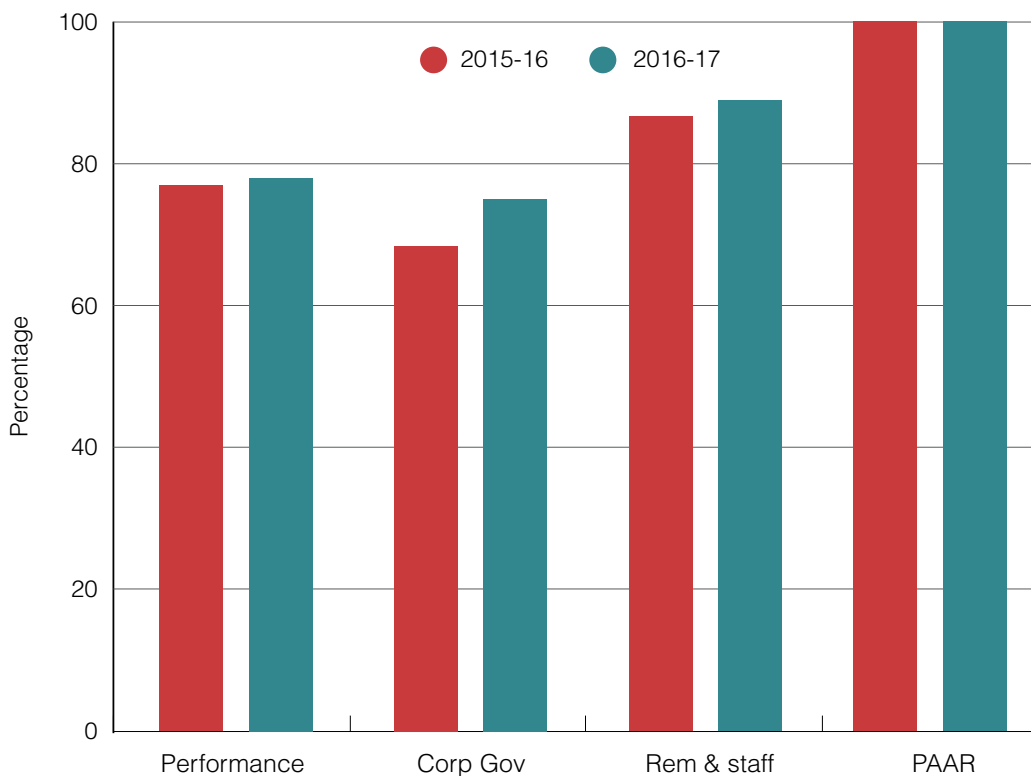
Charities SoRP Annual Reports

42 Exhibit 6 shows compliance with mandated Charities SoRP requirements analysed over the six separate elements required in the report.

Exhibit 6 – Annual Report compliance with mandated Charities SoRP requirements
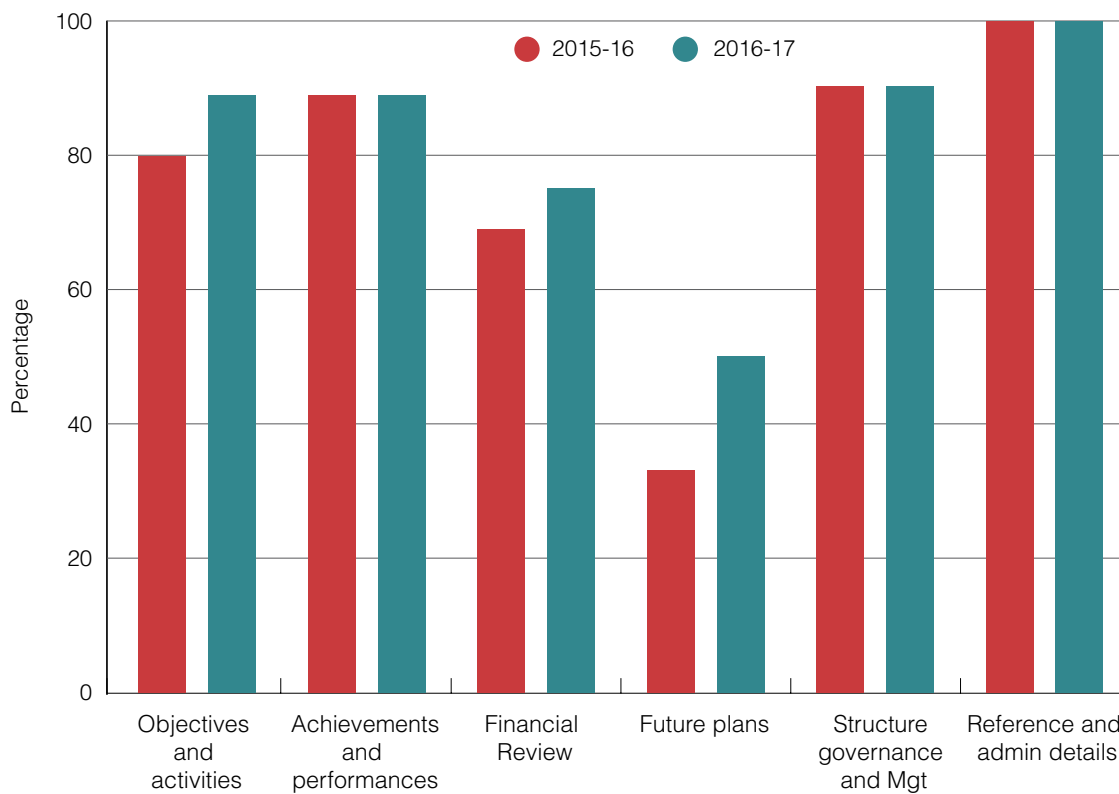
Source: Wales Audit Office review of 2015-16 and 2016-17 Annual Reports

Qualitative aspects

43   While compliance omissions are generally straightforward to address, it is more difficult to address readability and accessibility issues. It is far easier to write a long narrative report than a short engaging report using infographics to simplify complex reporting. Given the finite and very limited resource in many of the audited bodies this is especially difficult.

44   Improving annual reporting will be an iterative process and learning from others is key. Good practice identified from the annual Excellence in reporting in the Public Sector award is a great reference document to learn from and is available on the NAO website. Awarded jointly by PricewaterhouseCoopers and the National Audit Office, continued improvement has been seen in public body reporting, with more time invested in producing engaging and clear annual reports but also making use of good practice examples from their peers.

45   In Exhibit 7 below I reiterate from last year's report the key questions I would encourage bodies to ask themselves in preparing their Annual Reports. These questions should help reports focus on the key issues without allowing them to get lost in too much narrative. Excellence in reporting doesn't mean providing more information, but instead ensuring that key insights and issues are communicated clearly, in balanced and transparent manner.

Exhibit 7 – Key questions to ask when compiling an Annual Report

Does it tell the story of:

- Who you are and what you do?
- How you have performed and how you measure performance?
- What worries the Board?
- How you ensure governance is doing its job?

Does it have brevity and clarity?

- Is it jargon free?
- Is too much detail masking key messages?
- Does it flow and use good summaries and infographics?

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There are a number of forthcoming financial accounting and audit developments that central government bodies will need to consider and prepare for

Future key IFRS changes (relevant to all Central Government bodies except charitable WGSBs)

46 Forthcoming changes to accounting standards (dealing with financial instruments, revenue from contracts with customers and leases), introduce key changes to the accounting principles to be applied by central government bodies. In particular IFRS 16 is expected to have a significant impact on accounts preparation.

Exhibit 8 – Forthcoming key IFRS changes

A table showing forthcoming key IFRS changes in standards IFRS's 9, 15 and 16.

Standard	Effective date	Further details
IFRS 9 financial instruments	2018-19	IFRS 9 financial instruments will replace IAS 39 and includes a new principles-based approach for the classification and measurement of financial assets. It also introduces a new impairment methodology for financial assets based on expected losses rather than incurred losses. This will result in earlier and timelier recognition of expected credit losses. The accounting requirements for financial liabilities are almost all carried forward unchanged from IAS 39.
IFRS 15 revenue from contracts with customers	2018-19	IFRS 15 revenue from contracts with customers introduces a principles-based five-step model for recognising revenue arising from contracts with customers. It is based on a core principle requiring revenue recognition to depict the transfer of promised goods or services to the customer in an amount that reflects the consideration the body expects to be entitled to, in exchange for those goods or services. It will also require more extensive disclosures than are currently required.

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Standard	Effective date	Further details
IFRS 16 leases	2019-20	IFRS 16 will replace the current leases standard IAS 17. The key change is that it largely removes the distinction between operating and finance leases for lessees by introducing a single lessee accounting model that requires a lessee to recognise assets and liabilities for all leases with a term of more than 12 months, unless the underlying asset is of low value. It will lead to all leases being recognised on the balance sheet as an asset based on a right of use principle with a corresponding liability for future rentals. This is a significant change in lessee accounting.

Future changes to UK GAAP (relevant to charitable WGSBs only)

47   Following the introduction of the new UK GAAP (Generally Accepted Accounting Principles) accounting regime in 2015-16, and the replacement of the Financial Reporting Standard for Smaller Entities (FRSSE) by Section 1A of FRS 102 in 2016-17, there will be no substantive changes to FRS 102 until 2019-20. Any changes made then are expected to be limited in nature. More significant amendments are expected from 2022-23, reflecting recent changes in International Financial Reporting Standards, including accounting for financial instrument and leases.

The introduction of the Well-being of Future Generations (Wales) Act 2015

48   The Well-being of Future Generations (Wales) Act 2015 (the Act) became law in April 2015. The Act requires me to report before the next National Assembly election on how public bodies are acting in accordance with the sustainable development principle when setting their wellbeing objectives and taking steps to meet them. This year I am conducting my first work under the Act – the Year One Commentary – to understand how bodies are beginning to respond to the requirements. Undertaking the Year One Commentary will enable the Wales Audit Office to provide some early feedback without prescribing expectations for how public bodies should be undertaking their new responsibilities. The Year One Commentary will aim to support progress, while ensuring that new approaches can emerge.

49 I am also working collaboratively with a small number of public bodies (including some central government bodies), to develop a future audit approach that is meaningful, integrated and proportionate. The outputs from this work will be shared at a national event in May 2018.

National Fraud Initiative

50 National Fraud Initiative (NFI) is a data-matching exercise that helps detect and prevent fraud and overpayments from the public purse across the UK. The NFI matches data across organisations and systems to help public bodies identify fraud and overpayments.

51 Since it began in 1996, NFI exercises have resulted in the detection and prevention of more than £30 million of fraud and overpayments in Wales and £1.3 billion across the UK.

52 NFI exercises are run every two year and the 2016-17 NFI exercise to date has identified £4.8million worth of fraud, error and overpayments. Forty two Welsh public sector bodies took part in the exercise. These included the Welsh Government and 4 Welsh Government Sponsored bodies who participated on a voluntary basis. We are currently working jointly with the Welsh Government to extend NFI data-matching into new areas that are considered to have a high level of inherent fraud risk.

53 I would encourage all audited bodies to take part in the bi-annual exercise. Though there may not be substantial savings to individual bodies from the exercise there are wider benefits to consider:

- pan-public sector – the more participants, the greater effectiveness;

- the work will form part of an audited body's assurance framework;

- participation does prevent and detect fraud. Publicised participation is a deterrent to would-be fraudsters; and

- continually evolving with new data sets and matches introduced. Grants due diligence likely to be a future dataset.

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Appendices

Appendix 1 – Central government bodies in Wales audited by the Auditor General for Wales (AGW) or by the AGW on behalf of the National Audit Office

A table listing the central governments bodies in Wales audited by the Auditor General for Wales (AGW) or by the AGW on behalf of the National Audit Office.

Audited bodies	Number
Welsh Government	**1**
Welsh Government Sponsored Bodies (non-charitable)	**4**
Sports Council for Wales	
Social Care Wales	
Higher Education Funding Council for Wales	
Natural Resources Wales	
Welsh Government Sponsored Bodies (charitable)	**3**
Arts Council for Wales	
Amgueddfa Cymru – National Museum Wales	
National Library of Wales	
Company subsidiaries of the Welsh Government limited by Guarantee	**4**
Hybu Cig Cymru (Meat Promotion Wales)	
Careers Choices Dewis Gyrfa Ltd	
Sector Development Wales	
Life Sciences Hub	

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Audited bodies	Number
Bodies independent of Welsh Government	**10**
Older People's Commissioner	
Children's Commissioner	
Welsh Language Commissioner	
Future Generations Commissioner	
Public Services Ombudsman for Wales	
Education Workforce Council	
Estyn	
Qualifications Wales	
Local Democracy and Boundary Commission	
National Assembly for Wales Commission	
Accounts audited on behalf of the Comptroller and Auditor General	**2**
Sports Council for Wales Lottery Account	
Arts Council for Wales Lottery Account	

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Appendix 2 – My reporting responsibilities

My reporting responsibilities

What I report on in my certificate and report:

Opinion on Financial Statements

a) Do the financial statements give a true and fair view of the state of the body's affairs?

b) Have they been properly prepared?

Opinion on Regularity

Have the expenditure and income in the financial statements been applied to the purposes intended by the National Assembly for Wales and do the financial transactions recorded in the financial statements conform to the authorities which govern them?

Opinion on other matters

a) Has the part of the Remuneration Report to be audited been properly prepared?

b) Is any other information that has been published with the financial statements consistent with those financial statements?

Matters on which I report by exception:

a) where the Governance Statement does not reflect compliance with guidance;

b) where adequate/proper/sufficient accounting records have not been kept;

c) where the financial statements and the part of the Remuneration Report to be audited are not in agreement with the accounting records and returns;

d) where information specified by HM Treasury/Welsh Ministers regarding the remuneration and other transactions is not disclosed; or

e) where I have not received all of the information and explanations I require for my audit.

My Report

I must also consider whether I have any further observations to make on these financial statements and state the position here. If I do have further observations I make them in a separate report and refer to them here.

The context of my reporting: materiality

In planning and conducting the audit, I seek to identify material misstatements whether caused by fraud or error in the financial statements. Misstatements, including omissions are considered to be material if they, individually or in the aggregate, could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements. Where a material misstatement or omission remains in the audited financial statements I will amend my standard certificate and report.

Materiality depends on the size of the item or error judged in the particular circumstances of its omission or misstatement.

My determination of materiality is a matter of professional judgement and is influenced by several factors including:

- the type of audited body;

- the nature of the services the body provides;

- legislative requirements; and

- the financial information needs of legislators and other users of the financial statements.

Whether an item is judged to be material can also be affected by certain qualitative issues such as legal and regulatory requirements and political sensitivity.

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How I can amend my certificate and report

My certificate: qualified and unqualified audit opinions

Table detailing how the Auditor General for Wales can amend his certification and report. It describes the 5 types of auditor opinions that can be expressed.

Type of opinion	Description
Unqualified opinion	The financial statements give a true and fair view and there are no irregular transactions, in all material respects.
Qualified 'except for' opinion – limitation of scope	The financial statements give a true and fair view and there are no irregular transactions, except for the effect of a material matter where the auditor was unable to obtain sufficient evidence.
Qualified 'except for' opinion – disagreement	The financial statements give a true and fair view, and there are no irregular transactions except for the effect of a material matter where there was a disagreement between the auditor and audited body about how the matter was treated in the financial statements.
Adverse opinion	There was a disagreement that was both material and pervasive, that the financial statements as a whole were misleading or incomplete.
Disclaimer of opinion	The auditor was not able to express an opinion, because they could not obtain evidence to such an extent that the financial statements as a whole could be misleading or incomplete.

My certificate: emphasis of matter, other matters, and reports by exception

My audit report may also contain an 'emphasis of matter' paragraph. This draws the attention of users of the financial statements to a matter, or matters, presented or disclosed in the financial statements, which are of such importance that they are fundamental to users' understanding of the financial statements. This does not affect my opinions.

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I may add an 'other matter' paragraph if I consider it necessary to communicate a matter, other than those that are presented or disclosed in the financial statements, that is relevant to users' understanding of the audit, my responsibilities or the audit report.

I report by exception if:

- the annual governance statement does not reflect compliance with guidance;

- the information given in the explanatory foreword was not consistent with the financial statements; or

- I exercise any additional powers or duties under the Public Audit (Wales) Act 2004.

My Report:

Where I have any further observations to make on the financial statements I make them in a narrative report referred to as a 'substantive' report. Ordinarily I will make a substantive report where I qualify any of my opinions, but I may choose to make one where my opinions are unqualified.

Appendix 3 – Key questions for those charged with governance to consider when reviewing the accounts

Primary Statements and Notes

- Can management explain any significant differences between this year and last year?

- Have management sufficiently explained the basis for any prior year restatements? Are such explanations appropriate?

- Do any of the analyses of expenditure or income include significant amounts categorised as 'other'. If so, what does this relate to?

- Are the disclosed operating segments consistent with your understanding of how the department functions, and how it reports and informs its decision-making processes?

- Are there significant current or non-current liabilities (including provisions) on the Statement of Financial Position? Do they represent future risks to the body which should be included in the risk register?

- Does the Statement of Cash Flows demonstrate use of resources in line with the body's priorities? For example, does the 'Cash flows from investing activities' section reflect investment in future assets or infrastructure?

- Are there any non-descriptive lines (for example, which include the word 'other')? If so, what do these relate to, and is it right that they are included in the Statement of Cash Flows?

- Are there any unusual reserves, or transfers between reserves, that require explanation?

- Are the accounting policies understandable?

- Are there any significant commitments which are at risk from potential changes in policy or plans? For example, are any leased buildings likely to become unused before the end of the lease period?

- Have management clearly explained the rationale behind any additional obligations entered into during the year?

- Are the contingent liabilities consistent with the risk register?

Governance Statement and Remuneration Report

- Is the Governance Statement a balanced reflection of the department's activities in this area? Are risks and weaknesses openly and honestly considered?

- Has appropriate approval been obtained for exit packages which are outside of standard terms?

- Are the changes in numbers of staff employed in line with your understanding of changes in the department during the year?

- Has relevant approval been obtained for reported losses and special payments?

- How have management satisfied themselves as to the value for money case for these payments?

Source: Questions based on the National Audit Office's guide to Central Government Accounts

Archwilydd Cyffredinol Cymru
Auditor General for Wales

How Local Government manages demand – Homelessness

WALES AUDIT OFFICE
SWYDDFA ARCHWILIO CYMRU

I have prepared and published this report in accordance
with the Public Audit (Wales) Act 2004.

The Wales Audit Office study team was project managed by Nick Selwyn and comprised Gareth Jones, Steve Frank, Euros Lake, Martin Gibson and Duncan Mackenzie under the direction of Jane Holownia.

Huw Vaughan Thomas
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Wales Audit Office
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Summary report

Local authorities are reacting to the problems caused by homelessness with varying degrees of success, but there is limited focus on preventing the fundamental causes of homelessness

1   Given the ageing population and rising public expectations, which are putting a strain on local authorities' budgets, many local authorities across the UK are considering where they can drive greater efficiencies, improve productivity, or reduce expenditure on services by reducing levels of service or removing services entirely. Demand management can be a starting point for local authorities and public service providers as they balance delivery of services that meet the needs of citizens with fewer resources at their disposal.

2   In the past, increasing demand for services was often addressed by allocating more resources, widening out activities, developing new programmes or projects, improving infrastructure and increasing provision. With reduced public sector funding, public bodies need to find ways of reducing demand, and costs, whilst continuing to meet their statutory responsibilities.

3   This review of homelessness services assesses how well the local government is managing demand, considering the wider principle of prevention. We selected homelessness for a number of reasons. First, the Welsh Government, through the Housing (Wales) Act 2014, fundamentally changed the duties of local authorities with regard to homeless people. From April 2016 local authorities are required to provide everyone, whether homeless or not, with housing advice and assistance, and must seek to prevent homelessness from occurring where possible. A focus on prevention fits well with managing demand.

4   Secondly, people become and stay homeless for a whole range of complex and overlapping reasons, and solving homelessness is about much more than putting a roof over people's heads. Many homeless people face a number of issues in addition to, but often compounded by, their homelessness. For example, homelessness can be the result of:

   a   a lack of affordable accommodation;

   b   poverty and unemployment;

   c   mental health issues;

   d   alcohol, drug and gambling addictions;

   e   traumatic life events including childhood abuse, family breakdowns or instability, foster care, frequent moving, domestic violence, institutional care and parental death;

   f   convictions and imprisonment along with a lack of appropriate support following release; and

   g   discrimination by some landlords.

5   Thirdly, by looking at homelessness, we have been able to test how well local authorities balance delivery of services that people are entitled to, with finding solutions that are cost effective and reduce future demand. Responding to homelessness is also within the gift of each local authority and there is no prescribed or single approach in how authorities meet these needs. Our examination of homelessness services touches on wider corporate policies and approaches to managing demand for other public services and other public bodies.

6   Finally, data sets have been revised by the Welsh Government to take account of the new responsibilities of homelessness prevention and provide sufficient information to be able to assess if authorities and their partners are preventing homelessness.

About this report

7   This review has focussed on assessing if local authorities and their partners are addressing demand through the development of appropriate and effective prevention approaches. Our study methods are set out in Appendix 1. These include audit fieldwork at five local authorities; a commissioned survey of citizens about local authority services; a detailed analysis of data and expenditure on homelessness services; website and document reviews; and interviews with national organisations. Based on the findings of this audit, the Auditor General has concluded that local authorities are reacting to the problems caused by homelessness with varying degrees of success, but there is limited focus on preventing the fundamental causes of homelessness.

Summary of our findings

8   The Housing (Wales) Act 2014 places homeless prevention at the centre of local authority duties, requiring authorities to focus their work on problem solving, negotiating, persuading and mediating to address homelessness. This requires authorities to both widen staff skills, and change how they organise services to mainstream prevention work and reduce demand. Better performing authorities recognise that how services are structured and delivered can encourage and create unnecessary demand, which requires new and very different ways of working to successfully prevent homelessness. However, many authorities are yet to strategically review their services to improve their effectiveness in preventing homelessness or changing citizens' behaviour.

9   To assist with the implementation of the 2014 Act the Welsh Government provided grant funding of approximately £11.5 million between 2015-16 to 2017-18 and plan to spend a further £6 million per year in 2018-19 and 2019-20. Whilst this funding has supported authorities to implement their new duties, the overall level of funding on homelessness and housing advice services has fallen in real terms. This is concerning as citizens we surveyed have low levels of satisfaction with homeless services, rating them as the poorest quality service that local authorities provide.

10   Despite low levels of service user satisfaction with homelessness services, citizens still consider their local authority to be the key agency to contact to resolve issues and address their problems. However, authorities are not always organising their services to consistently engage with users and potential users of homeless services, and opportunities to reduce homelessness demand by broadening and better targetting advice are being missed. Website information varies too widely to consistently meet people's needs.

11   Whilst citizens have clear expectations of how and what they want authorites to do in all areas of activity, their experience suggests that services are becoming less accessible overtime. Authorities need to make available a range of options, directly and indirectly with partners, to address homelessness. However, current approaches vary too widely and homeless people get very different solutions depending on where they seek help in Wales.

12   The Welsh Government recognises the importance of joint working between key partners in tackling homelessness. The Housing (Wales) Act 2014 places new duties on social services and housing associations requiring them to collaborate with local authority homelessness services to prevent and address homelessness. The impact of these new duties has been negligible in many local authority areas and partners are not always contributing to the prevention of homelessness.

13   Whilst national data highlights some achievements in preventing homelessness, the levels of successful prevention work is beginning to decline and the numbers threatened with homelessness and requiring temporary accommodation from local authorities are growing. Some authorities are not meeting their responsibilities under the Equality Act 2010, and are unable to demonstrate that their services are equally accessible and made available to all citizens.

14   The change in emphasis for local authorities in addressing homelessness has been positive, and progress is being made in a number of important areas. However, responses still focus on resolving the symptoms of homelessness and local authorities and partners are not effectively tackling the underlying causes.

15   Ensuring long-term sustainable prevention is difficult in key areas of activity across all of Wales because the work of public bodies in Wales is often shaped by decisions they cannot influence. Policy alignment is critical to preventing homelessness but the split in responsibilities between the UK and Welsh Government creates challenges for local authorities and partners, particularly in respect of welfare benefits.

16   Focusing on demand, management is hard because responsibilities rarely fall to one organisation and requires long-term commitment to deliver sustainable results. Collaboration is critical to managing demand but solutions are still too often driven by individual organisations. There is growing recognition that managing demand needs to become more central to how public bodies collectively plan and deliver services, but progress has been slow. Local authorities have generally not moved from conceptualizing what demand management could mean for them to actually improving how they manage demand in distinct services. Consequently, public bodies' current approaches to managing demand are often falling short of their responsibilities under the Wellbeing of Future Generations Act 2015.

Recommendations

Our work has identified a series of recommendations for improvement and these are set out below.

Recommendations
R1   Implementing the Housing (Wales) Act 2014 requires local authorities to develop services which are focussed on preventing homelessness and reducing demand. These are very different to traditional casework led homelessness services, and prevention work requires new skills and early interaction with users and potential users. We found local authorities' progress in revising and strengthening services is variable (paragraph 1.12 – 1.20). **We recommend that local authorities:** • **ensure their staff are sufficiently skilled to deal with the new demands of mediating, problem solving, negotiating and influencing with homeless people; and** • **review and reconfigure their services to engage more effectively with homeless and potentially homeless people to prevent homelessness.**
R2   The Welsh Government provided funding to support local authorities to implement the Housing (Wales) Act 2014 and this funding has been critical in enabling new preventative services to be developed. The funding is in place until 2019-20 but authorities need to ensure they use to headspace provided by these resources to revise their services to deliver their responsibilities in the future (paragraph 1.21 – 1.28). **We recommend that local authorities review their funding of homelessness services to ensure that they can continue to provide the widest possible preventative approach needed. Reviews should consider use of Supporting People as well as General Council fund monies to support delivery of the authority's homelessness duties.**

Recommendations

R3 How services are configured and managed at first point of contact can significantly influence how effective local authorities are in managing and reducing demand. Easy to access services which maximise usage, avoid gate keeping and focus on early solutions can significantly improve the prospects for successful homelessness prevention. We found that some authority point of entry systems are poorly designed which reduces the authority's prospects for early intervention to prevent homelessness from occurring (paragraphs 2.4 – 2.11). **We recommend that local authorities:**

- **design services to ensure there is early contact with service users;**
- **use 'triage' approaches to identify and filter individuals seeking help to determine the most appropriate response to address their needs; and**
- **test the effectiveness of first point of contact services to ensure they are fit for purpose.**

R4 Establishing clear standards of service that set out what the authority provides and is responsible for is critical to ensuring people know what they are entitled to receive and what they need to resolve themselves. We found that authorities are not always providing clear, concise and good quality information to help guide people to find the right advice quickly and efficiently (paragraphs 2.12 – 2.17). **We recommend that local authorities publish service standards that clearly set out what their responsibilities are and how they will provide services to ensure people know what they are entitled to receive and what they must do for themselves. Service standards should:**

- **be written in plain accessible language;**
- **be precise about what applicants can and cannot expect, and when they can expect resolution;**
- **clearly set out the applicant's role in the process and how they can help the process go more smoothly and quickly;**
- **be produced collaboratively with subject experts and include the involvement of people who use the service(s);**
- **effectively integrate with the single assessment process;**
- **offer viable alternatives to the authority's services; and**
- **set out the appeals and complaints processes. These should be based on fairness and equity for all involved and available to all.**

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	Recommendations
R5	Local authorities need to design services to engage with service users effectively and efficiently, but current standards are too variable to ensure service users are getting access to the advice they need (paragraphs 2.18 – 2.24). **To improve current performance we recommend that local authorities make better use of their websites to help manage demand by:** • **testing the usability and effectiveness of current website information using our lines of enquiry set out in Appendix 5;** • **increasing and improving the range, quality and coverage of web based information; making better use of online applications; and** • **linking more effectively to information from specialist providers' and advice specialists, such as Citizens Advice.**
R6	The Housing (Wales) Act 2014 introduces a new duty on social services and housing associations to collaborate with local authority homelessness services in preventing homelessness. We found that these arrangements are not operating effectively and service responses to prevent homelessness and assist homeless people are not always being provided, nor are they consistently effective (paragraph 3.13 – 3.25). **We recommend that local authorities set out and agree their expectations of partners identifying how they will work together to alleviate homelessness. The agreement should be reviewed regularly and all partners' performance reviewed to identify areas for improvement.**
R7	Local authorities monitoring systems and evaluation approaches to ensure compliance with their responsibility under the Equality Act 2010 and the Public Sector Equality Duty are not working as well as they should (paragraph 3.35 – 3.39). **We recommend that local authorities address weaknesses in their equalities monitoring, and ensure that their homelessness service accurately records and evaluates appropriate data to demonstrate equality of access for all service users that the local authority has a duty towards.**

Recommendations
R8   Managing demand can be challenging for local authorities. There are some clear lessons to be learnt with regard to the implementation of the Housing (Wales) Act 2014 and homelessness prevention duties that can be applied to managing demand in other services (paragraphs 4.24 – 4.27). **We recommend that local authorities use the checklist set out in Appendix 10 to undertake a self-assessment on services, to help identify options to improve how they can help manage demand.**

Part 1

Legislation focusses on preventing homelessness but not all authorities have effectively organised themselves to fully implement these new duties

1.1 Dating back to 1977, there has been a legal duty for the state to help people who are homeless or threatened with homelessness. Local authorities are responsible for this in England, Scotland and Wales, while Northern Ireland has a single organisation – the Northern Ireland Housing Executive (NIHE) – who is responsible for housing. With the devolution of housing policy to Northern Ireland, Scotland and Wales, each country has developed different approaches to tackling homelessness. In Wales, authorities have to provide everyone, whether homeless or not, with housing advice and assistance, and must seek to prevent homelessness from occurring where possible. This is very different to other parts of the United Kingdom.

1.2 In this section of our report we briefly outline the different approaches to addressing homelessness in the United Kingdom, highlighting the Welsh Government's change in focus to create new duties that seek to prevent homelessness from happening in the first place. We also review how authorities are progressing in implementing these new duties, drawing out the challenges they present to the traditional focus on homelessness casework services and the very different skillset now required to prevent homelessness. We highlight how well authorities are addressing this challenge and the risks that remain. Finally we review how authorities are investing in homelessness services to support full implementation of the prevention agenda, and set out the financial risks that authorities face.

The Housing (Wales) Act 2014 changes how local authorities address homelessness and represents a major shift in approach compared to other parts of the UK

1.3 The Housing (Homeless Persons) Act (1977) made local authorities responsible for the long-term rehousing of some groups of homeless people for the first time. The Act defined which groups of homeless people were considered to have a 'priority need', and therefore might be owed a statutory duty to be provided with settled accommodation by local authorities. Whilst the 1977 Act created a safety net that required local authorities to assist homeless people, it also made a distinction between those who should be assisted – mainly families with dependent children – and those who authorities did not have to assist.

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1.4 In 1996, the duties in the 1977 Act were revised with the introduction of the Housing Act 1996 (for England and Wales), and the definitions of households in priority need was set out in greater detail and the circumstances in which local authorities should assist homeless persons or those threatened with homelessness. Under the 1996 Act eligibility for assistance was more tightly defined and authorities were required to assess and determine whether someone:

a was homeless or would become homeless within 28 days;

b was deemed eligible for assistance;

c had a priority need as defined in the statutory guidance;

d had a local connection with the local authority area; and

e had become, or will become, homeless unintentionally.

1.5 The duty placed on local authorities was therefore to assist those households who were considered to be the most vulnerable and often the victims of circumstances beyond their control. Consequently a large number of homeless people, especially single people, had no automatic right to accommodation or help to prevent their homelessness, even if they occupied very temporary or insecure accommodation or, indeed, no accommodation and were sleeping rough.

1.6 The 1996 Act[1] broadly remained the basis for authorities' responsibilities towards homeless people in Wales up until 2014, when the Welsh Government[2] introduced the Housing (Wales) Act 2014 (the '2014 Act') which changes the focus of local authority work and widens authority responsibilities to cover a much broader group of people[3]. Central to the new approach introduced by the 2014 Act, is a focus on better managing demand by preventing homelessness and finding more cost effective and sustainable solutions by intervening earlier to address the people's homelessness.

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1 This is the system that currently operates in England and Northern Ireland.
2 Housing policy, in particular how local authorities manage homelessness, is a devolved matter within the United Kingdom with each country setting its own legislative and policy framework for administering and tackling homelessness. In recent years, there have been changes in how each country addresses homelessness and there are consequently significant differences between the four countries of the United Kingdom.
3 The new legislation was introduced on 27 April 2015 following research, development and consultation and replaced Part VII of the Housing Act 1996, the Homeless Persons (Priority Need) (Wales) Order 2001, the Homelessness Act 2002 and the Homelessness (Suitability of Accommodation) (Wales) Order 2006

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1.7 The legislation has changed the law on homelessness in Wales in a number of important ways and the new system, which commenced in April 2015, is very different to the legal frameworks for homelessness in the rest of the United Kingdom. The 2014 Act:

a   places a new duty on local authorities to carry out 'reasonable steps' to prevent or relieve homelessness for all eligible households, greatly increasing the number of people who can be helped;

b   has created more flexibility in the range of local authority interventions, and also expanded the definition of 'threatened with homelessness' so that people are assisted when they are within 56 days of losing their home;

c   requires authorities to undertake better, more targeted, prevention work with increased help, advice and information for households;

d   has also sought to encourage a more person-centred service culture within local authorities, so that service users are closely involved in identifying and putting into action the solutions to their housing problems;

e   has a stronger focus on the service user, requiring local authorities to help homeless and potentially homeless people to address the causes of their homelessness and make informed decisions on finding solutions to their housing problem; and

f   places a stronger emphasis on co-operation and multi-agency working to enable a holistic response to meeting the needs of homeless and potentially homeless people, in particular enabling local authorities to make more effective use of the private rented sector as a solution to homelessness.

1.8 Taken together, these changes greatly increase the number of people who authorities can assist and is very different to the previous legislative system. Under the old systems local authorities had to challenge and investigate each case of homelessness and determine what assistance, if any, they had to provide. Whilst local authorities in England[4] and the Northern Ireland Housing Executive are encouraged to focus on preventing homelessness where possible, their duties in respect of homelessness are not framed around prevention as the primary driver. This is very different to Wales.

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4   The legislation governing homelessness is, however, due to change in England with the implementation of the Homelessness Reduction Act 2017. The 2017 Act sets out new duties on English local authorities with the aim of preventing homelessness and is similar in coverage to the 2014 Act in Wales. These new duties will come into force in 2018.

1.9   In comparison to the rest of the United Kingdom, the Scottish Government through its Homeless (Abolition of Priority Need Test) (Scotland) Order 2012, removed the distinction between priority cases of homelessness and those that up until 2012 had only been entitled to temporary accommodation. In Scotland local authorities no longer operate unintentionality and priority need tests, and the 2012 Act, entitles anyone finding themselves homeless through no fault of their own, to settled accommodation. Previously, homeless people with 'priority need', such as families with dependent children, had the accommodation entitlement from local authorities, but that has been extended to anyone, such as single people, finding themselves 'unintentionally homeless'. This has removed much of the investigative requirements and has resulted in Scottish authorities rehousing greater numbers of homeless people.

1.10   As a result of these different changes, care needs to be taken in comparing performance between countries as the systems that govern homelessness are very different. Appendix 1 summarises the key differences between the countries of the United Kingdom.

The new prevention duties require different staff skills and new ways of working but authority responses to these challenges vary

1.11   As noted in the preceding section, front-line responsibility for helping homeless people in Wales falls to local authorities who have a statutory duty to assist those who are homeless or threatened with homelessness. Up until the introduction of the 2014 Act this required local authority staff to make inquiries, and satisfy themselves whether a duty was owed to a homeless applicant based on their investigation of each individual's circumstances against the five eligibility tests noted above (paragraph 1.4). This assessment could often be very complex, drawing in a wide range of information covering, for example; tenancy disputes, a person's behaviour, family issues, relationship breakdown, an assessment of potential vulnerability, employment matters, financial standing and immigration status.

1.12 Given the previous investigatory focus of homelessness work, authorities needed to appoint and train staff to have a detailed knowledge of housing case law and tenancy rights. This was essential if authorities were going to both conduct and complete a thorough investigation into the individual circumstance of each homeless person and make the right initial decision, but to also defend the authority if its decision was challenged legally[5]. Authorities also had to ensure that they had staff with a good understanding of associated welfare and social policies such as housing benefits, immigration status, welfare payments and social care eligibility and assessment criteria; key areas that often needed to be investigated when making a decision on someone's homeless application.

1.13 With the introduction of the 2014 Act local authorities now need their staff to prevent homelessness through effective problem solving, negotiating, mediating and influencing people and behaviours. Upskilling staff to focus on problem solving, mediation, multi-service responses, and knowing how and where to commission the right prevention activity is a very different set of skills to traditional homelessness casework. For example, local authority staff now need to:

a   persuade and convince homeless people to make choices and often take different actions;

b   negotiate effectively with landlords to change their decisions;

c   work creatively to problem solve and overcome obstacles to find a solution that best resolves a situation; and

d   influence people – parents and family members for example – to reach a mutually satisfactory agreement that may not have been their original intention.

5   Homeless applicants had the right to request a review by the authority and, subject to the outcome of this review, could also appeal to the County Court and, in certain circumstances, request a judicial review. For example, where an authority refused to house a homeless applicant while it carried out enquiries; ignored relevant factors (such as their health) when deciding whether the temporary accommodation they provided was suitable or not; or refused to review its original decision.

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1.14 Despite local authorities anticipating that the 2014 Act would require a change in staff skills, a large number have struggled to make the effective transition from the old homelessness system to the new one. Authorities we visited noted that implementing the Housing Act 2014 created difficulties for them, particularly in respect of the amount of work required to deliver the new duties, the changing focus of activity and the personal interaction skills required by staff to work with vulnerable people to prevent homelessness. This is borne out by the findings of a recent Welsh Government survey of local authorities on the challenges of implementing the Act which found that 17 of the 22 authorities have experienced significant challenges implementing the Act[6]. In particular, fieldwork authorities noted to us that training and guidance provided by the Welsh Government was delivered very shortly before the commencement of the new duties, which limited the opportunities to reorganise services in sufficient time.

1.15 In addition to developing new skills amongst staff, local authorities recognise that they need to change their systems and processes for managing homelessness to enable them to effectively deliver the duties of the 2014 Act. In particular, the need to organise services to deliver more prevention options, reduce dependency and encourage self-reliance amongst individuals. Positively, most of our fieldwork authorities are changing how they structure and deliver homelessness services to better manage and prevent homelessness demand. The better performers recognise that how services are structured and delivered can encourage and create unnecessary demand, and to successfully prevent homelessness requires the adoption of new and very different ways of working.

6   The Welsh Government appointed Salford University to undertake a survey of local authorities on their experience in implementing the Housing Act 2014. The survey was undertaken in August 2016 and was reported in August 2017 – Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report, 8 August 2017, Welsh Government. The Welsh Government provided the Wales Audit Office with the anonymised raw data to support delivery of this study and to avoid duplication of activity.

1.16 For example, Carmarthenshire County Council has moved away from face-to-face office based application and assessment processes to introduce more flexible ways of working to increase the prospects of preventing homelessness from occurring. Similarly, Bridgend County Borough Council is seeking to move more information relating to housing issues online so that people can access that information without needing to meet a council official in person. The authority has also developed a Customer Service and Access Strategy which sets out actions to reduce failure demand[7].

1.17 Too often though, the changes that authorities are making to their homelessness services are initiative-led rather than a fundamental reconfiguration of services. Consequently, many of the changes we have seen are very new and their success has not been subject to a full evaluation. They do however, show a willingness from local authorities to try new ways of working to deliver better outcomes to reduce demand and prevent homelessness. However, only four authorities noted that they had upgraded their IT systems to bring their management systems in line with the 2014 Act.

1.18 Despite the greater emphasis placed on authorities needing to prevent homelessness, roughly a third of authorities have a limited focus on changing behaviours amongst service users and, to an extent, staff. Some authorities continue to provide a 'paternalistic' service with homelessness services and staffing responsibilities continuing to operate with little change. These approaches can often create a culture of entitlement and dependency simply because the authority has structured services to encourage demand.

1.19 The impact of legislative change and the requirement to develop new staffing and service responses can be challenging. Frontline staff we interviewed during our study fieldwork noted that rigid eligibility criteria and prescriptive requirements, often set for valid and good reasons, can in practice be a barrier to managing demand. For example, one of the requirements for implementing the 2014 Act of the Welsh Government was for local authorities to use a series of notification letters that are sent out at different times during their investigations. A substantial number of local authority officers noted to us that these decisions are stretching staff resources and increasing workload. The administration time required to provide various notification letters, and personal housing plans, are time consuming to prepare and great caution has to be taken to ensure they are not open to legal challenge, although the Welsh Government has noted that these are to be provided over a 100 day or more period and they do not consider them to be too onerous.

7 vanguard-method.net

1.20 Likewise, local authorities who require homeless people to physically present at their office for assistance and staff continuing to investigate intentionality and priority need rather than seeking quicker and more timely approaches which deliver quicker solutions to prevent homelessness. Prescriptive approaches reduce discretion, limit suitable alternatives, decrease local choice, and ultimately adversely impact on public bodies' ability to improve how they manage demand for services. Recent research by Shelter Cymru found that "homelessness services are in transition. Currently this transition appears to be taking place unevenly, within authorities as well as between them. We spoke to people who felt they'd been helped effectively and people who felt they'd been brushed off with minimal help, despite having presented to the same authority at the same time."[8]

Reductions in local authority expenditure on homelessness services has been offset by Welsh Government grant funding but not all authorities are using this grant to develop sustainable approaches to tackling homelessness

1.21 An area where local authorities have been positive about the support provided by the Welsh Government is the grant funding allocated for the implementation of the 2014 Act. To assist with the implementation of the 2014 Act the Welsh Government provided Homelessness Prevention Transitional Funding to local authorities of: £5.6 million in 2015-16; £3 million in 2016-17; and £2.8 million in 2017-18. The draft budget for 2018-19 and 2019-20 includes an additional £6 million in each year which has been added to the Revenue Support Grant to support delivery of local authority homelessness prevention duties under Part 2 of the 2014 Act. This funding has been provided to support authorities to review and reorganise their services to better position themselves to deliver their new statutory duties.

8   Reasonable steps: experiences of homelessness services under the Housing (Wales) Act 2014, Shelter Cymru, 2016.

1.22 Without the Welsh Government ring fenced grant, authority homelessness staff stated to us that they would not have been able to implement the Act. We found that local authorities are using the transitional funding in three main ways:

a   employing additional staff in, for example, private rented sector or housing solutions roles or to work with specific groups of homeless or potentially homeless people. However, these posts can often be fixed term or temporary for the duration of the funding and there is uncertainty if authorities will continue with these posts in the medium to long-term;

b   developing their IT infrastructure to improve efficiency of administration and improve prevention work and casework management; and

c   creating prevention funds for deposits, rent in advance, rent guarantees, bonds, and to cover debt and arrears.

1.23 In some authorities, however, the transitional funding has been used to offset reductions in core authority funding with Welsh Government monies covering the cost of posts previously funded from the General Council Fund. 14 of the 22 authorities responding to the Welsh Government's survey on implementing the 2014 Act, note that apart from the transitional funds, there had been no increase in resources available within their local authority to prevent and tackle homelessness. We found through our fieldwork that some authorities have consequently not taken the opportunity afforded by the Welsh Government's transitional monies to change their homelessness services to better deliver their new duties.

1.24 Our analysis of annual data returns to the Welsh Government since 2009-10, set out in Exhibit 1, show that in absolute (cash) and real terms, spending on homelessness and housing advice has fallen significantly in recent years; homelessness by roughly £7 million, and housing advice by £1.4 million. In real terms, a 24.1% and 27.9% cut respectively. A detailed analysis of homelessness and housing advice expenditure by local authority is set out in Appendix 3.

There has been a significant reduction in local authority expenditure on housing advice and homelessness services in recent years.

Year	Homelessness spend			Housing advice spend		
	Absolute (£'000)	Real terms (£'000)	Real terms (% change)	Absolute (£'000)	Real terms (£'000)	Real terms (% change)
2009-10	£26,269	£28,773	-	£6,637	£7,270	-
2010-11	£31,333	£33,703	17.1%	£5,101	£5,487	-24.5%
2011-12	£23,734	£25,180	-12.5%	£4,253	£4,512	-37.9%
2012-13	£22,843	£23,736	-17.5%	£4,231	£4,396	-39.5%
2013-14	£20,461	£20,916	-27.3%	£5,035	£5,147	-29.2%
2014-15	£18,849	£18,989	-34.0%	£5,246	£5,285	-27.3%
2015-16	£21,822	£21,822	-24.1%	£5,240	£5,240	-27.9%

Source: Revenue outturn (RO) data collection, Welsh Government. This information has been audited by the Wales Audit Office and the figures presented in the exhibit are drawn from updated returns collated from local authorities. This information is different to the unaudited data presented on StatsWales.

1.25 From our analysis of local authority expenditure, we found that roughly half of the authorities reduced expenditure between 2009-10 and 2015-16. Exhibit 2 below, shows that the largest budget reductions between 2009-10 and 2015-16 have been in Cardiff (-73.8%), Pembrokeshire (-48.5%) and Monmouthshire (-46.2%). 11 authorities have increased expenditure in this period with the largest rises in Merthyr Tydfil (67.1%), Flintshire (63.8%) and Newport (51.3%).

Exhibit 2 – Real terms change in expenditure on homelessness and housing advice services in Wales between 2009-10 and 2015-16 by local authority

The graph shows the proportional change in investment made by local authorities in their homelessness and housing advice services in the last seven years. The graph highlights that overall there has been a 26.3% reduction in real terms on how much all Welsh local authorities are spending on homelessness and housing advice services. The change in expenditure ranges from budgets reducing by 76.6% in Cardiff to budgets increasing by 49.7% in Merthyr Tydfil.
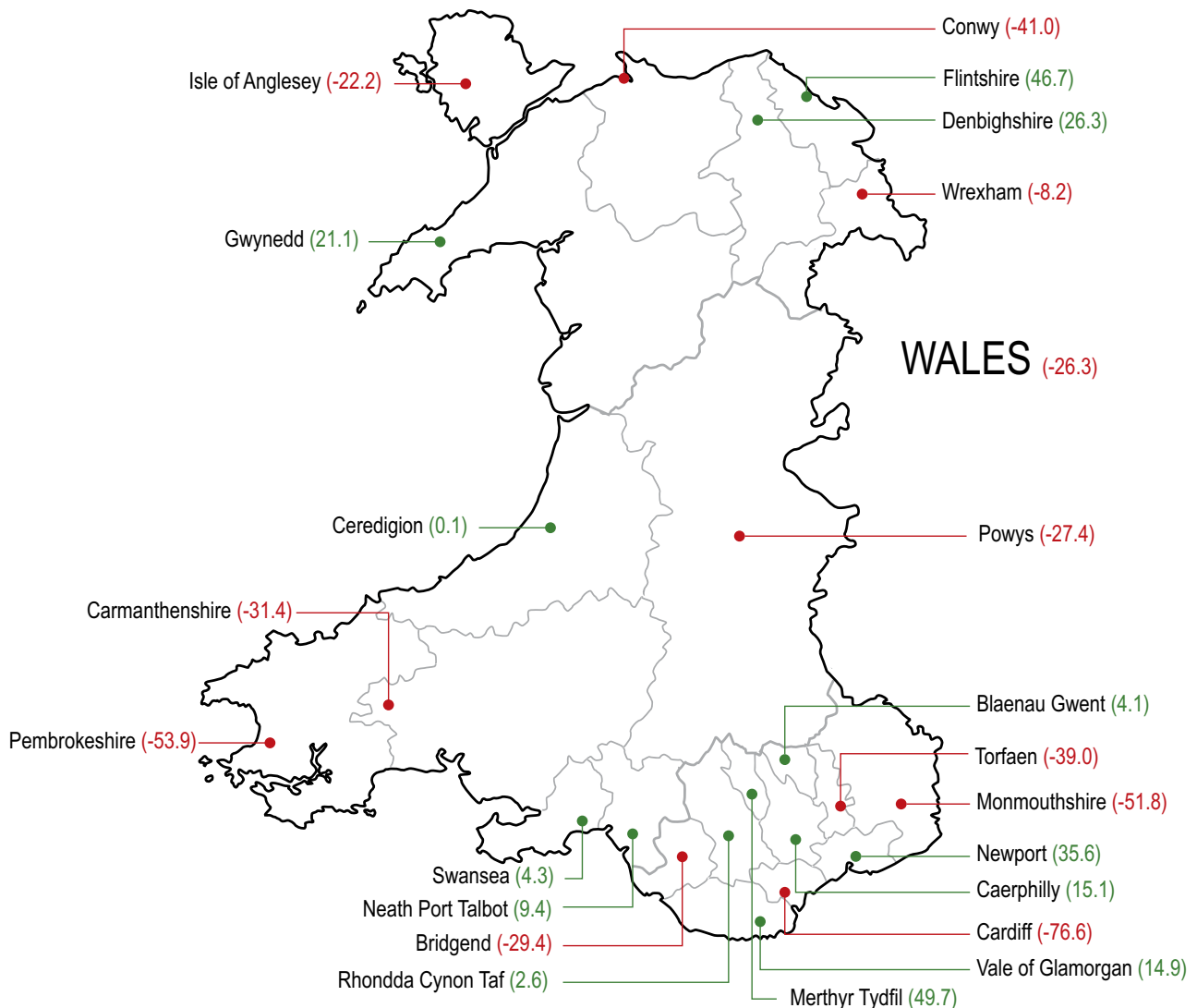
Conwy (-41.0)
Flintshire (46.7)
Denbighshire (26.3)
Isle of Anglesey (-22.2)
Wrexham (-8.2)
Gwynedd (21.1)
WALES (-26.3)
Ceredigion (0.1)
Powys (-27.4)
Carmanthenshire (-31.4)
Blaenau Gwent (4.1)
Torfaen (-39.0)
Pembrokeshire (-53.9)
Monmouthshire (-51.8)
Newport (35.6)
Swansea (4.3)
Caerphilly (15.1)
Neath Port Talbot (9.4)
Cardiff (-76.6)
Bridgend (-29.4)
Vale of Glamorgan (14.9)
Rhondda Cynon Taf (2.6)
Merthyr Tydfil (49.7)

Source: revenue outturn (RO) data collection, Welsh Government. This information has been audited by the Wales Audit Office and the figures presented in the exhibit represent updated information collated from local authorities. This information is different to the unaudited data presented on StatsWales.

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1.26 There are a number of reasons for some of these reductions in authority expenditure. For example, Cardiff Council's figures include payments from the Home Office under the National Asylum Support Service contract[9], which has now ended. In Monmouthshire County Council the transfer of private sector leasing properties to a housing association has resulted in a fall in expenditure on homelessness.

1.27 Given the reduction in expenditure in some authorities, there is a risk that authorities will not be able to continue to provide some of the new services critical to preventing homelessness. This was flagged by roughly a third of authorities responding to the Welsh Government survey of those concerned that the loss of transitional funding in 2018-19 would present a threat to their continued implementation of the Act. The continuation of Welsh Government funding will help support authorities to deliver their new responsibilities.

1.28 This is particularly challenging for local authorities as the citizens we surveyed who have used homelessness services in the last 12 months generally have low levels of satisfaction with the quality of services they receive. Continued reductions in authority resources for homelessness and housing advice services are likely to result in even lower levels of satisfaction in the future. We found that citizens are most satisfied with libraries, doorstep recycling, education, collection of council taxes and refuse collection. The local authority services with the lowest levels of satisfaction are provision of temporary housing and homelessness services and repair of roads. Temporary accommodation and homelessness services comparatively, have very low levels of satisfaction and are well below the average satisfaction rate for all local authority services. Exhibit 3 below summarises the detailed survey findings.

9   The National Asylum Support Service (NASS) provided accommodation for asylum seekers whilst their application was considered by the Home Office. Cardiff Council was the regional lead for accommodation provision working with the Home Office under the NASS contract which has since ended.

Exhibit 3 – Citizens' views on the quality of local authority services they have used in the last 12 months

The graph summarises the views of 750 citizens on the quality of local authority services and shows that citizens we surveyed rate homelessness and temporary accommodation services as the poorest quality service provided by their local authority.

Legend:
- Very or fairly good
- Poor or very poor
- Neither good nor poor

Categories (top to bottom):
- The provision of temporary housing and services to homeless people and those at risk of becoming homeless
- Repair of roads
- Maintaining the quality of pavements
- Parking services
- Planning and building control
- Council housing
- Street cleaning
- Social services for adults
- Environmental health
- Social services for children and families
- Council owned leisure facilities
- Housing benefits
- Parks, playgrounds and other open spaces
- Refuse collection
- Collection of council taxes
- Education
- Doorstep recycling
- Libraries

Source: Wales Audit Office, Citizen Survey, March 2017

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Part 2

Authorities are changing how they provide services and are generally effective at providing advice, but not all homeless people and potentially homeless people get the help they need

2.1 A key duty of authorities under the Housing (Wales Act) 2014 is the provision of effective advice and assistance. Section 60 of the 2014 Act places a duty on local authorities to provide everyone, whether homeless or not, with housing advice and assistance to help to secure accommodation. Advice and information should be based on person-centred assessment of need; be available to all people in its area, or people who have local connection; should be free; and should at least relate to preventing homelessness, securing accommodation and accessing any other help that is needed.

2.2 Local authorities should use a variety of media to provide advice, including face-to-face, telephone based, printed material and on-line. The timing of advice is also important, with a wide a range of information made available as early as possible. Having the right first point of contact and the right mediums to engage with service requests is also a prerequisite for authorities being able to respond to the needs of homeless people, manage expectations and influence demand for their services. Improving customer care, digitization of services, including self-help and improved online and paper based guidance are key components of demand management.

2.3 In this section of the report we consider how citizens find out about the services that local authorities provide, and whether services are configured to maximise usage and assistance. We review how well authorities engage with users and potential users, and whether services are provided both quickly and efficiently to homeless people to offer them timely advice to prevent homelessness. We also consider whether changes made to services are improving how homeless and potentially homeless people are accessing the help they need.

Local authorities have not organised their services to efficiently and consistently engage with potentially homeless people

2.4 Appropriate, available and timely advice is essential to help homeless and potentially homeless people make the right choices to address their housing situation. Local authorities have a duty to homeless people to ensure they make available good quality information in accessible ways. The importance of good quality advice is recognised in the findings of the Welsh Government's survey of local authorities on implementing the Housing Act 2014, where 20 of the 22 authorities agree that the 2014 Act has influenced them to provide improved information and advice. To discharge their homelessness duties local authorities need to use a wide range of channels to engage with their citizens; offer good quality advice and information in a range of formats; and test that their approaches are working effectively.

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2.5   We asked people who use local authority services how they obtain information about their local authority and the services it provides. We found that many citizens place greater reliance on indirect and non-authority sources of information than material published by authorities. For example, 44% of people rely primarily on local media as their main source of information about local authority services. Nonetheless, citizens we surveyed continue to see their authority as the first point of contact to resolve issues and the primary source of advice and information to help address their problems. For example, just over half of the citizens said that their main reason for contacting the council in the past year had been to either report a problem (27%), or to seek advice and information (24%). A higher proportion of those aged over 55 contacted their authority to report a problem, whilst younger respondents and people who are unemployed are more likely to request advice and information.

2.6   The 2014 Act requires authorities to now deal with people who are at risk of homelessness much earlier (56 days) than under the previous legislation, and to provide a broader range of options to resolve and prevent homelessness from happening. Configuring services to effectively engage with citizens is essential if authorities are to comply with their statutory duties and maximise their resources to better meet the demand from homeless people.

2.7   Citizens tend to use a range of approaches when contacting an authority to request a service, or when they need assistance. Our survey found that whilst service users most often telephone authorities, either via a customer call line/centre or directly to a specific department or person, a significant number also use e-mail (directly or via the authority website), as well as visiting an office or information centre. Authorities need to ensure that people are aware of the methods that they can use to contact the authority, and they should monitor the effectiveness of these arrangements.

2.8   There are a number of challenges for authorities delivering services to homeless people. On a practical level, people who are homeless, and those threatened with homelessness, often do not have the finances to visit authority offices. The quality of public information also tends to be generic and not tailored to individuals, which makes it less relevant and consequently often ineffective at guiding them on what they need to do. People who use homeless services use in person contact and third party contact with local authorities rather than web based services and social media. Authorities need to understand service users' communication preferences and to design information in ways that they can best access directly or via partner agencies.

2.9 Given the different approaches citizens use, authorities need to ensure they offer a broad range of options to respond effectively to their needs. Authorities also need to understand how and when people enter the 'public service system'. Good quality customer/user data and intelligence is critical to this process. Therefore systems for customer contact should be wide ranging; fully accessible; and capture the work of all relevant public sector bodies[10].

2.10 Carmarthenshire County Council reviewed its housing options services in 2011 to determine the best way of providing housing options services to enable staff to engage more quickly and efficiently with service users in ways that reflected the preferences of homeless people. The review concluded that homeless people preferred a telephone based service to face to face office based interviews. Subsequently, the authority has introduced a telephone call handling service to act as a first point of contact triage service which provides initial advice and information to identify how best to meet client's needs. If a person's circumstances are more complex and require further intervention, then the triage team refer the individual onto specialist case officers.

Carmarthenshire County Council – The authority's Housing Options and Advice team's approach to coping with incoming activity provides a good example of how to deal with service demand

In 2013, the Council had limited information on customer satisfaction and addressed this with the introduction of five evaluative questions asked to each person who contacted the service. These were focussed on the quality of advice, resolution of issues and communication methods. The Council also analysed the numbers of calls being dealt with, and found that only 40% of calls were being answered at the first point of contact.

The Council installed a screen to show the demand coming in and to allow team members to better manage the demand, enabling the use of data to match callers to the best suited staff members. The new approach contributed to increasing the proportion of housing options calls dealt with at first contact to 96%.

The Council strives to resolve issues at the first point of contact wherever possible. In 'making every contact count', the core team dealing with incoming calls is made up of officers with a variety of backgrounds who can provide solutions to people's problems. This is also found to be more satisfying for team members who actually help and advise on housing options for people as a result, rather than taking and diverting calls to more suitable departments.

10 Gateway reviews along intervention timelines in youth justice services are an increasingly established way of understanding how and when people enter the 'public service system'.

2.11 A number of authorities noted that a substantial percentage of contacts between the public and housing options officers is not for specific homelessness assistance, but to obtain advice on wider housing issues. For example, at the time of our fieldwork Merthyr County Borough Council operated generic Housing Solutions Officers which provide services for a wide range of issues including homelessness and other matters. The housing options service requires those threatened with, or actually homeless, to physically attend offices and to be interviewed, unless they are unable to attend the civic centre. Whilst officers recognise that this approach enables the authority to identify and focus on the needs of homeless people, their initial analysis and evaluation of casework found that only 19% of contacts were requests for homelessness services and the other 81% related to other housing issues. Poor organisation of staff and services can therefore generate additional and often unnecessary demand.

There are opportunities to reduce homelessness demand through the provision of effective information and advice, but authorities fall short of the standards required in key areas

2.12 As well as making advice available through a range of appropriate channels, authorities also need to ensure the advice they provide meets the needs of those requiring help to avoid creating 'failure demand'[11]. Avoiding 'failure demand' is better for the service user and more cost effective for an authority as it cuts costs by reducing avoidable contact between the authority and its users by resolving problems as quickly and efficiently as possible. To achieve this authorities need to resolve citizens' problems at the first point of contact by providing information and advice that is relevant, timely, comprehensive and clear.

2.13 Poorer performing authorities are often creating additional demand by failing to do something or do something right for the service user at the initial contact. Exhibit 4 below summarises the findings of our citizens' survey and shows that there is variable performance across Wales, and authorities are not always effective in how they engage with services users.

11 Vanguard Method.

Exhibit 4 – How well local authorities respond to requests for assistance

There is variable performance in relation to how well authorities respond to request for assistance from homeless people and other local authority service users and are consequently able to avoid failure demand
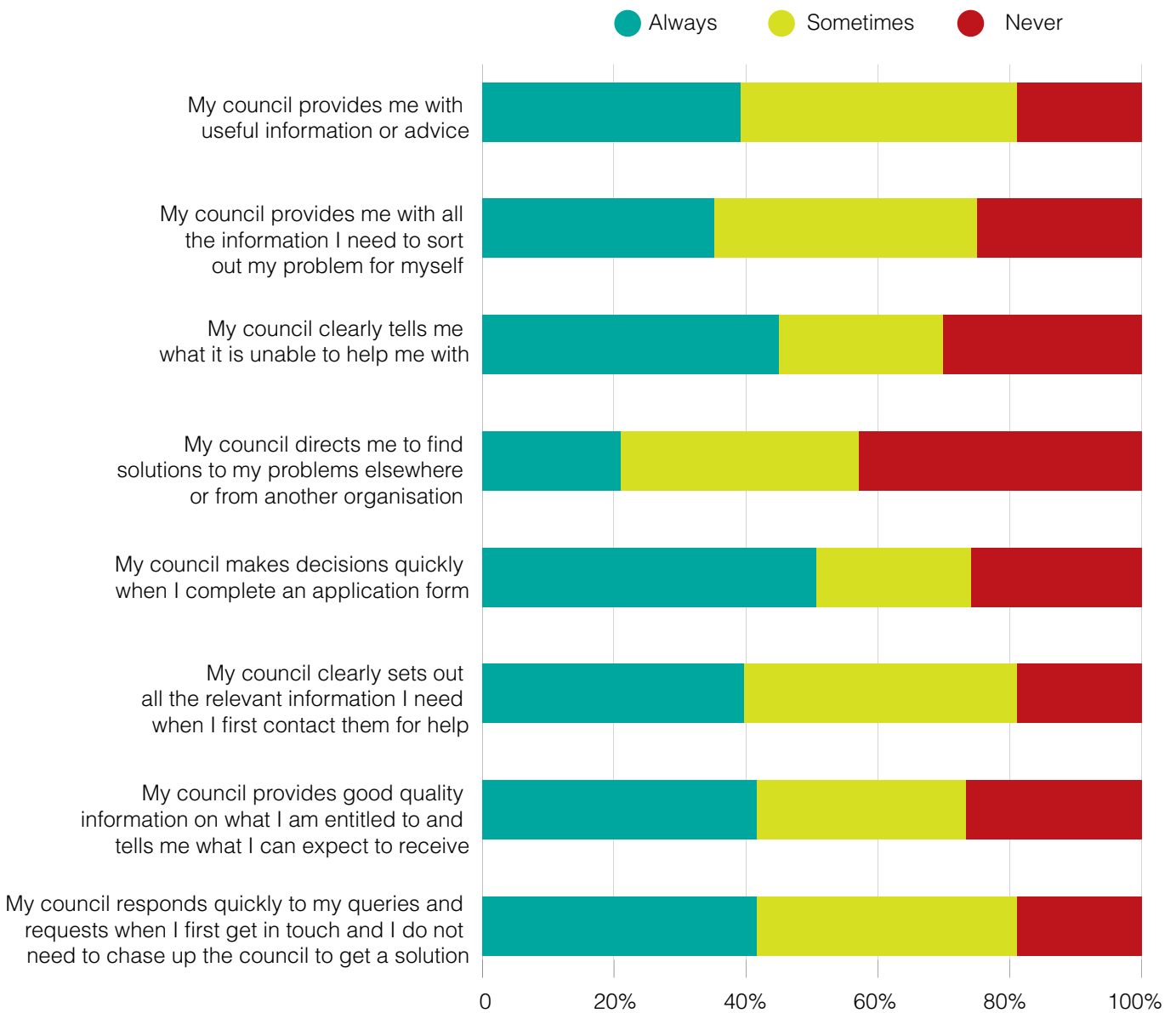
Source: Wales Audit Office, Citizen Survey, March 2017.

2.14 Engaging effectively and early with homeless people is essential if authorities are to successfully prevent homelessness. Our survey found that there is no discernible difference between the views and experiences of homeless people compared to those who use other services provided by local authorities. Citizens who have used homelessness services are generally positive that authorities respond quickly to requests for help, providing useful advice and information. Where people apply for a homelessness service the majority stated that authorities make decisions quickly. However, authorities are not always good at directing homeless people to find solutions to problems elsewhere, or from another organisation. Similarly, authorities do not always clearly set out what homeless people are entitled to and can expect to receive, which is creating uncertainty and ambiguity for them. A quarter of survey respondents also note that their authorities are also poor at telling them what they are unable to help with.

2.15 Reducing unnecessary demands on homelessness services is often hindered by poor or unclear service standards[12]. Service standards are often not published, and it is not always clear what homeless people can expect now and in the future. Some public services provide clear service standards. Whilst many authorities have some form of corporate customer care standard, for example Flintshire County Council's Customer Service Policy[13], these often lack clear measures of success, and do not set out what authorities do not do and the expectations of homeless applicants and wider users of public services. Good service standards need to:

a   be written in plain accessible language that is well understood by users, including those that may be anxious or uncertain about their future;

b   be precise about what applicants can and cannot expect, and when they can expect resolution;

c   be clear about the applicant's role in the process and how they can help the process go more smoothly and quickly;

d   be produced collaboratively with subject experts and includes the involvement of people who use the service(s);

e   be linked to good gatekeeping and a single assessment process;

f   offer viable alternative preventative services; and

g   be based on fairness and equity for all with appeals and complaints processes clearly set out and promoted widely.

2.16 Better performing authorities organise homelessness services in ways which help people to resolve their problem at first interaction. Integrating customer contact centres can help manage demand by reducing the numbers of separate service requests from homeless people and signposting a fuller package of support and information. Newport City Council's Information Station, on the site of the old Newport railway station, offers services from Newport City Council and partner organisations and services such as citizen's advice, tourism, employment, community safety and the authority's homelessness services as well as an increasing range of other authority services such as housing, social services and planning.

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12 Service standards define the service provided by a public body. They inform customers of the services they are entitled to receive; provide a foundation for the delivery of services; allow for better measurement of an organisation's performance; and form the basis of the internal management information systems.
13 Customer Service Policy

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2.17 Partner organisations we interviewed such as Shelter Cymru highlighted that from their experience authorities have yet to develop comprehensive or accessible information and advice services that consistently meet the needs of homeless people. Because of the complexities of homelessness, voluntary sector partners also feel that authorities are not maximising opportunities to work collaboratively with specialist agencies to identify and address the needs of people with challenging issues – prison leavers and people with substance misuse issues for example – and advice often falls short of providing timely and effective solutions.

Digitisation offers authorities opportunities to improve how homeless people access services and advice but current approaches vary too widely to meet their needs

2.18 Smartphones[14] are invaluable tools for connecting people who are isolated, and empowering homeless individuals to access important, often, life-changing services and gain self-sufficiency. Some homeless people are using social media to build support networks and solve practical issues such as where to find help and assistance. Mobile phones, and in particular smartphones, offer homeless people a valuable lifeline to opportunities. Homelessness organisations told us that some homeless people often need support to access information on local authority websites, and authorities are beginning to address how information is accessed. All organisations recognised however, that access to good quality on-line information is vital and the use of mobile telephones to access this data is growing.

Better use of technology to help prevent homelessness

Better technology can help manage and prevent further challenges to homelessness people. New services include touch-screen kiosks, phone charging terminals, better Wi-Fi coverage and free access to the use of computer terminals[15]. Projects such as the Virtual Backpack – which is an electronic bundle of important personal documents – builds on the work by Westminster City Council who hosted a Homeless Hack Day to take advantage of the free Wi-Fi provided for Olympics visitors in 2012. The Homeless Link website lists information on 9,000 services such as hostels, day centres, and advice and support services and is offered by local authorities in response to the increasing numbers of rough sleepers in London. Sandwell Council in the West Midlands provides an internet based application system for young homeless people to access services, keep in contact with friends and family, and find jobs.

14 A smartphone is a mobile personal computer with a mobile operating system with useful features for mobile or handheld use. Testing the mobile experience for 'Better connected' is done from a smartphone and fully integrated into the overall assessment.
15 The potential for empowering homeless people through digital technology, Lemos and Crane 2013.

2.19 Authorities need to therefore ensure that online information is accurate, of a good quality and up-to date to support homeless people addressing their needs. Our review suggests that at present there is scope for authorities to improve how they organise and provide their services online to both ensure homeless people, and those threatened with homelessness, get the help they need but also enable authorities to make the best use of their resources.

2.20 SOCITM's Better Connected Ratings[16] provide an overall evaluation of a user experience of local authorities' digital platforms across all services including homelessness. SOCITM's Better Connected results for 2016-17 (Appendix 4) rated no council in Wales as having a four star (very good) user experience for their digital platforms. 11 local authorities are rated as three star and 11 as two star or below. When comparing performance with 2015-16, six local authorities improved their rating, three saw their ratings worsen and 13 local authorities' ratings stayed the same. Overall, there is scope for the Welsh local government to improve how it uses its web assets to engage with and support people.

2.21 16 authorities are rated by SOCITM as having passed the mobile standard[17] assessment, and 15 authorities the accessibility assessment[18]. Only one council improved its rating in the area of accessibility, with all others retaining their previous rating. Compared to 2015-16, three local authorities that passed have now failed, and three that failed have now passed. Local authorities who make no attempt to optimise their sites for mobile access are providing the service user with a poorer user experience.

16 SOCITM, the society for public sector IT practitioners undertakes annual reviews of council digital performance, websites, social media and customer portals, as well as take-up, satisfaction and management. SOCITM reviewers conduct some tests on a smartphone, given nearly half of all visits are made from mobile devices. SOCITM publishes the results of their reviews as Better Connected data.
17 The mobile standard is determined by the average satisfaction rating for each of five questions used by SOCITM to find common information from a mobile device plus overall ease of use. Generally, better performing authorities have no errors while people are browsing the authority site and the overall mobile experience is rated satisfactory or very good.
18 Websites must be as accessible as possible for all users, including people with disabilities. Badly designed and implemented websites can make it difficult or impossible for disabled people to use the internet, including those using assistive technologies, for example, text-to-speech screenreaders. SOCITM rate the accessibility of local authority website against 14 design and coding best practices.

2.22   We assessed the quality, accessibility and range of current information that authorities provide on their websites for their homelessness service and, for comparison, two other service areas – home to school transport, and bulky waste – to assess the current standards of service and the quality of information provided. Our review judges the effectiveness of authority websites to provide quick and easy 'customer journeys' and successful resolution of homeless peoples service requests against a five point scale ranging from very poor to very good to rate the information across 13 aspects. Appendix 5 sets out our detailed findings and the key lines of enquiry for our assessment.

2.23   Authorities generally provide up-to-date information which is available in a range of formats and languages which is easy to find. The best performing authorities have developed on-line application processes, although this was more prevalent for home to school transport and bulky waste than homelessness services. However, most authorities do not provide comprehensive wide ranging advice and information that is sufficient to allow citizens to make considered choices and decisions on what they should do to resolve their problem. Information relating to homelessness was harder to find and did not always clearly signpost people to where they could get assistance to address their problems, compared with the other two services we reviewed. These weaknesses present a less than positive starting point for homeless people, and does not offer them the information they need to make informed choices to address their predicament. The poor quality of current digital services may also explain the low current take up amongst service users.

2.24   From our fieldwork, we have concluded that whilst authorities recognise that they need to design services to engage with homeless people effectively and efficiently, current standards of services are too variable to ensure homeless people are getting access to the advice and assistance they need. Taken together, SOCITM's analysis and the findings of our review highlight that authorities could make better use of their websites to help manage demand. For this to work, authorities will need to consider when and where channel shift can take place and ensure they engage with homeless people and other stakeholders to maximise the potential benefits of these approaches.

Homeless people are clear on how they want their local authority to provide services to them but their experience suggests that services are becoming less accessible

2.25 Homeless people and other local authority service users have high expectations of what authorities should do for them and how they should provide services to them. Whilst many people acknowledge local government is having to change how they provide services to reflect the resources that are available, homeless people and other people using local authority services still believe that their local authority should continue to provide a safety net when they need help. The findings of our survey bear this out and provide some clear messages for how local government provides homelessness and other services in the future – Exhibit 5.

Exhibit 5 – Key issues in how local authority should provide services in the future

Homeless people and other local authority service users are clear on how they want local authorities to provide homelessness and other local authority services to them in the future.

Thinking about the services your council needs to provide in the future, to what extent do you agree or disagree that they should focus on...	Strongly agree/ agree	Strongly disagree/ disagree	Do not know
Focus on providing advice and information and directing me to others who are best placed to solve my problem	83%	9%	8%
Focus on providing advice and information to solve people's problems	81%	12%	7%
Direct people to other organisations who are best placed to solve their problems	81%	10%	9%
Provide more services in the community and in people's homes	79%	12%	9%
Be the first point of contact for any problem people have in their area	78%	18%	4%
Share offices with other public bodies	69%	15%	17%
Make more services available online	63%	26%	12%

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Thinking about the services your council needs to provide in the future, to what extent do you agree or disagree that they should focus on...	Strongly agree/ agree	Strongly disagree/ disagree	Do not know
Equip people to find their own solution to the problems they have	60%	31%	10%
Prioritise what is provided and reduce services in other areas of activity	51%	30%	19%
Reduce services provided from offices away from main town hall/county hall to local offices	42%	40%	18%
Increase council tax charges to have enough money to continue to provide existing services	29%	64%	7%

Source: Wales Audit Office, Citizen Survey, March 2017.

2.26 Positively, the majority of citizens continue to see the local government as their first point of contact when they require help to resolve their homelessness problems. Whilst citizens recognise that authorities need to equip them to become more self-resilient, the majority of respondent to our survey (78%) want their local authority to continue to act as a safety net to provide help and assistance if they are unable to address their homelessness or other problems themselves. People want their local authority to ensure that the advice and information they need is made available, either directly by authorities or indirectly by partners who work with the local government.

2.27 We also found that citizens are conscious of the need for local authorities to make the best use of their resources and support moving services online, sharing offices with partners and providing more services in the community and to people's homes. Just over half of respondents to our survey also recognise that the local government needs to prioritise where it spends its money. Whilst less than a third of people support increasing council tax charges to continue to pay for services, there is growing recognition that there may be a need to increase charges for services to ensure they continue to be made available.

2.28 We found through our fieldwork that local authority responses, following implementation of the 2014 Act, are too often focussing on their immediate challenges and authorities are not always taking a sufficiently strategic and preventative view on how best to meet need in the medium to long-term. Whilst a third of citizens who responded to our survey (Exhibit 6 below) have seen no discernible change in the services they receive from local government, the majority noted that from their experience, all authority services, including homelessness, are becoming less visible, available and accessible. Such choices, which are often made for very valid financial reasons, limit the potential to engage with service users quickly to prevent homelessness from occurring.

Exhibit 6 – Thinking about the services your council provides, in your experience, to what extent do you agree or disagree that…

Changes made to homelessness and other local government services affect how homeless people and others access and use authority services.
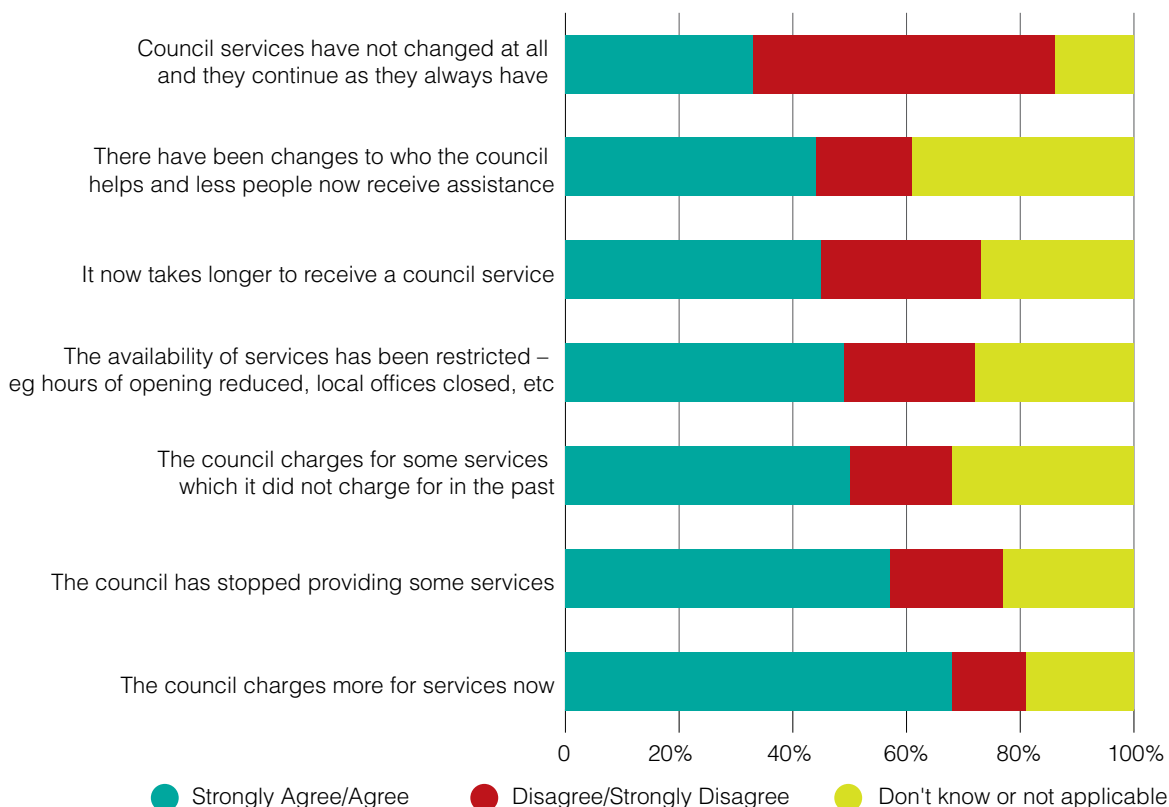
Source: Wales Audit Office, Citizen Survey, March 2017.

2.29 Too few local authorities are engaging users of homelessness services in their plans for the future, and therefore the authority's expectations of what is possible may be set unrealistically high. Consultation tends to be piecemeal and a 'one-off' set piece rather than a well-integrated, considered conversation with residents, partners and opinion formers. Some local authorities do analyse findings and set out what changes as a result, but most local authorities do not. For instance, Cardiff City and County Council regularly consults with local people on a wide range of policies, plans and proposals affecting the local community. The Ask Cardiff section of the authority's website includes an analysis of results of surveys conducted by the Council led Cardiff Research Centre.

Part 3

Homeless people or those at risk of homelessness get very different solutions depending on where they seek help in Wales
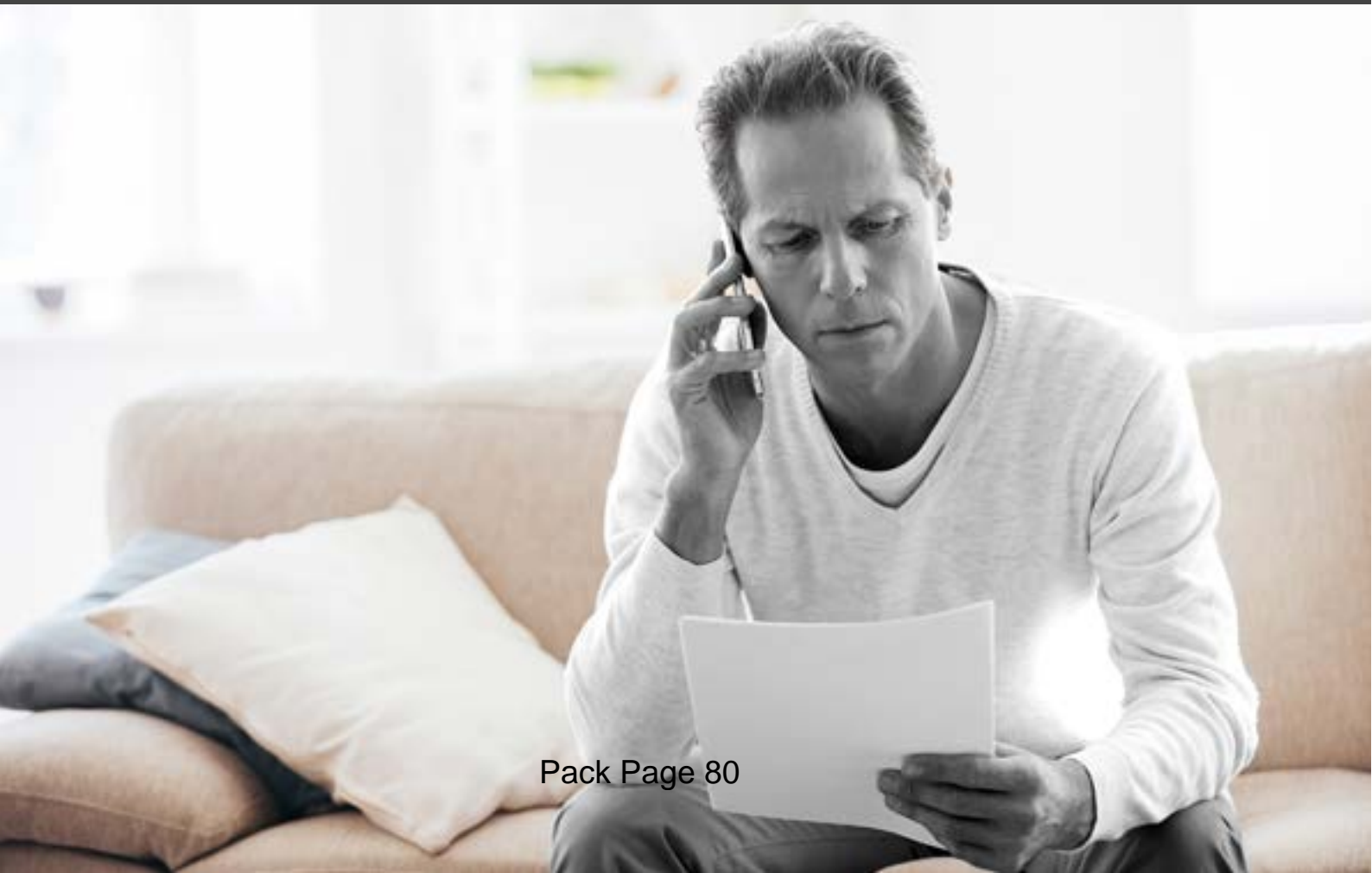
3.1 Local authorities recognise that preventing homelessness is a better outcome for homeless people. For many local authorities homelessness prevention is attractive in its potential contributions to financial savings, as well as easing the pressure on existing housing resources. A prevention-centred approach is, however, not an easy option for a local authority. Effective prevention work generally requires a more proactive approach, and demands greater flexibility and effort in order to achieve results. Authorities need to make available a range of options, directly and indirectly with partners, to make the most effective and long-term beneficial impact for a homeless, or potentially homeless, person.

3.2 In this part of the report we consider the range of options being used by authorities to address homelessness demand. We review current partnership arrangements, in particular the duty placed on local authority social services and housing associations to collaborate to prevent homelessness. We conclude this part of the report with an analysis of the effectiveness of local authority performance in preventing homelessness.

Most authorities have developed a range of choices to address homelessness but opportunities to broaden options remain

3.3 To address homelessness local authorities need to ensure that they have a range of options available to them to both prevent someone from losing their home and to secure accommodation where the authority has a duty to provide settled accommodation. A broad range of effective solutions, provided either directly or in partnership with other organisations, is essential.

3.4 Part 2 of the 2014 Act provides authorities with options to use the private rented sector to assist applicants and to bring their homeless duties to an end where the accommodation provided is both suitable and available for a minimum period of six months. This is an important change to the former legislation governing homelessness in Wales. Previously an authority's duty required them to secure settled accommodation, primarily using social housing. The 2014 Act therefore provides authorities with potential access to a wider range of property to discharge their homelessness duties, in particular the private rented sector.

3.5   Work with private landlords needs to be carefully managed to ensure homeless people are able to access private rented homes. To achieve this, a number of authorities have appointed staff to develop their work with landlords to improve access to properties. For example, the City and County of Swansea Council, Carmarthenshire County Council and Bridgend County Borough Council have all recognised the importance of engaging with private landlords and have invested resources in developing and managing these relationships. Authorities are also creating funds to support their work with private landlords providing rent in advance, bonds or rent guarantees as a means of encouraging joint working to secure accommodation for homeless people.

3.6   Whilst the 2014 Act allows greater use of the private rented sector, authorities note that securing homes from private landlords is not always easy. The introduction of mandatory licensing of private rented homes under the Rent Smart scheme[19] has resulted in some landlords electing not to continue to rent homes because the licensing regime is considered too onerous. For example, landlords or their agents have to undertake approved training to obtain a licence. Licences are issued subject to a condition that the Code of Practice issued under the 2014 Act is adhered to.

3.7   We found that the range of options used by authorities has generally increased since the introduction of the 2014 Act. For example, all 22 authorities use grants or loans to cover rent deposit schemes for accommodation in the private rented sector, which help homeless people resolve their housing predicament. In 18 of the 22 authorities grant provision has increased since April 2015. Similarly, all authorities provide support to homeless people to help manage debt or rent/mortgage arrears, and 15 have seen an increase in this provision under the 2014 Act. Similarly, all 22 authorities are able to use mediation[20] services and in ten authorities provision has increased in the last two years.

3.8   Whilst the range of assistance provided by local authority homelessness service is increasing, we found that some authorities are yet to develop a comprehensive suite of solutions to tackle homelessness. For instance, eight authorities do not use guarantee of payment schemes. Nonetheless, since the 2014 Act options to prevent and address homelessness are increasing and authorities are focussing on providing a wide range of options to tackle homelessness. Our detailed analysis is set out in Appendix 6.

19 Rent Smart Wales processes landlord registrations and grants licences to landlords and agents who need to comply with the Housing (Wales) Act 2014. Rent Smart Wales is hosted by Cardiff Council who ensures compliance with the legislation in partnership with the other 21 Welsh local authorities.
20 Mediation is a process for resolving disagreements in which an impartial third party (the mediator) helps people in dispute to find a mutually acceptable resolution.

3.9 Despite this positive picture, authorities face some challenges. Whilst the majority of authorities report that their preventative work is more effective following introduction of the 2014 Act, many state that success in preventing homelessness has only been possible because of the ring fenced grant from the Welsh Government. 15 of the 22 authorities also report that key services required to help prevent people becoming homeless in their area are currently unavailable or not available to the levels they need to meet demand. In particular, specialist housing for specific difficult to house groups, such as people with substance misuse issues, rough sleepers and young single people; affordable private rented accommodation; and supporting people services[21].

3.10 One important service that all authorities state is critical to prevent people becoming homeless, are Supporting People services. Further information on how the total Supporting People budget of £124 million per annum is broken down and spent across the different categories of support can be found in the Auditor Generals recent report on the Welsh Government's Supporting People Programme[22]. In brief, whilst spend within the Supporting People Programme specifically on generic floating support services for homelessness prevention has fallen by 25% from £21.3 million to £15.9 million between 2013-14 and 2016-17, the number of units of support has risen from 4,498 to 4,933 in this period. The pattern of supporting people services to homeless people is changing. Fieldwork authorities stated their use of generic floating support services for homelessness prevention allows them to proactively avoid homelessness from occurring or re-occurring.

3.11 We found that some authorities are using their Supporting People funds creatively. For example, the City and County of Swansea Council uses Supporting People monies to directly engage homelessness prevention officers to deliver prevention work, and Carmarthenshire County Council uses it to improve access to properties in the private rented sector and work with private sector landlords.

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21 The Supporting People programme provides housing-related support to help vulnerable people to live as independently as possible. The Welsh Government invests over £124.4 million annually supporting more than 57,000 people to live as independently as they can. Supporting People funds housing related support services that a landlord (such as a housing association) or other provider such as a voluntary organisation can provide. Support means advice and help to make it easier for vulnerable people to maintain their independence. People can receive support in a hostel or in sheltered housing or other type of supported living as well as their own home through 'floating support services'.
22 Supporting People Programme.

3.12 However, some authorities have not successfully aligned their Supporting People service with the prevention of homelessness. Joint working between local authority homelessness and Supporting People teams is often dependent upon internal authority management arrangements. Supporting People services located in Social Care departments often focus on social care priorities, and homelessness and housing services can be overlooked. Authorities we visited who are making best use of Supporting People monies to prevent homelessness are generally better integrated with housing teams and are good at incorporating homelessness data to inform their supporting people commissioning decisions. Generally, we found that such integrated planning results in better access to support services for homeless people.

Collaboration is seen as critical to preventing homelessness but the required contribution from partners is not always provided

3.13 In recognition of the need to seek holistic solutions to better meet the needs of homeless people, the Welsh Government strengthened collaboration and partnership duties in the Housing (Wales) Act 2014. Section 95 places a duty on local authorities to promote co-operation between housing (homelessness) services and social services. Section 95 also places a duty to co-operate with named bodies, in particular housing associations. Both the local authority Social Services and housing association partners must comply unless the action proposed is incompatible with their duties, or has an adverse effect on their functions. In these circumstances a written reason must be provided as to why a Social Services or housing association is not intending to comply with their duty under the 2014 Act.

3.14 Given these new arrangements, the role of partners is integral to a local authority's success in preventing homelessness. This is recognised by homelessness services across Wales with 20 of the 22 authority responses to the Welsh Government's survey noting that the 2014 Act is resulting in stronger cooperation between local authority services, especially with social services, to help address homelessness. Whilst a small number of authorities highlight positive developments with, for example, environmental health officers and estates teams working together, joint working with the wider range of public sector services is mostly under-developed. In particular, ongoing issues around poor discharge coordination with inadequate timescales to effectively manage the needs of clients who are often released from institutions without any pre-planning or engagement with homelessness services. A number of authorities similarly identified challenges to the operation of the Prisoner Pathway[23], including late notification of release and a lack of early planning between the relevant organisations.

3.15 Integrating processes is also an effective way of changing systems from allocating and rationing resources to finding the best solution in the medium to long-term. Capturing all potential needs/issues once, and sharing information with all relevant public bodies, improves efficiency and encourages holistic management responses for example by reducing the need to keep asking for personal information from applicants, and to adapt computer software that can track users from the point of entry into the system to successful conclusion.

23 The Prisoner Pathway is a Welsh Government initiative for people who are facing homelessness when leaving prison to enable them to receive better support to improve their access to a secure home, rather than staying in bed and breakfast accommodation.

Newcastle City Council's Active Inclusion Newcastle partnership to address homelessness

Newcastle City Council's Active Inclusion Newcastle (AIN) partnership is integrating services in response to the growth in demand for homelessness prevention advice and support. They help residents go through the transition needed when facing cuts in benefits payments. This is important because the council estimates Newcastle residents will lose £134 million annually by 2021-22. The top priority is to align budget processes to support the most vulnerable to prevent crisis. This includes integrating partner's staff training programmes and investing in research to develop a richer understanding of the balance of individual, systemic and structural causes of exclusion. In 2016 AIN trained 959 staff how best to talk to residents about digital, financial, employment and housing issues. As a result, no bed and breakfast accommodation was used since 2016, 3,775 cases of homelessness were prevented in 2015-16, and evictions reduced by 76%. In addition, 931 households were provided with emergency food, fuel, clothing or travel support; and membership of the Moneywise Credit Union increased to 8,276.

3.16 We found that some fieldwork authorities are improving joint working through, for example, co-locating services with partners. Sharing offices allows partners to identify people's support needs more quickly and make better quality referrals for support to take place. Officers told us that co-location is also allowing statutory and third sector agencies to develop and gain a greater insight into how each other operates, and is resulting in more rounded options to resolve people's homelessness situation.

3.17 However, a number of authorities also raise concerns that joint working with partner agencies is not always effective and needs to improve, particularly in respect of housing associations. Only eight of the 22 authorities note an improvement in joint working with housing associations. Whilst eight authorities have seen no discernible change in joint working since the introduction of the 2014 Act, six note that from their experience the 2014 Act is not resulting in more effective cooperation with housing associations.

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3.18 Those authorities that have established effective working arrangements with housing association partners generally have some common characteristics. There are often a common housing register and a common allocations policy[24] in place and joint operational policies covering for example, pre-tenancy engagement, debt advice, tenancy support and training. Better performing partnerships also formalise their relationship in agreements between local authorities and housing associations which set out how they will operate to both prevent homelessness – for example, by avoiding or seeking alternatives to evictions for rent arrears and anti-social behaviour – and maximise the accommodation and support they make available to resolve homelessness.

3.19 However, we found that in other authority areas the relationship is not yet as well developed and the housing associations duty to comply in preventing homelessness is not always effective. In particular, choices made by some housing associations are reducing some local authorities' abilities to deliver their homelessness duties. For instance, housing associations may exclude certain individuals from housing registers and/or an allocation to an empty home either because they have been assessed as being unable to afford the rent and rehousing them would set them up to fail, or because they are considered as being unable to manage a tenancy.

24 Common Housing Registers provide a single point of access for all people seeking social housing in a local authority area providing applicants with more choice and a more efficient service by removing the requirement for them to apply multiple times to different organisations. A Common Allocations Policy sets out how landlords prioritise who they house with all landlords following the same priorities for letting a home rather than operating their own individual policies. This both simplifies the process for letting homes but also increases the prospects of those in the greatest housing need (to whom local authorities have statutory duty) securing housing.

3.20 Similarly, some authorities highlight issues of concern over rent levels with some Association rents considered too high for homeless clients. In particular, housing developed without social housing grant[25] and let on intermediate or market rents[26] which are higher than housing benefit thresholds are seen as beyond the reach of homeless people.

3.21 Unaffordable rents is a growing risk for a number of authorities we visited who commented that some association rents exceed housing benefit levels and are unaffordable for many homeless clients, even those in work. For example, median gross weekly earnings for full-time adults working in Wales were £492.40 in April 2016. This is 91.4% of the average for the UK (£538.70). Median gross weekly earnings in Wales were the second lowest amongst the 12 UK countries and English regions[27].

3.22 Of particular concern for local authority homelessness services are the difficulties single people face in accessing association housing, specifically young single people. This is especially worrying as homelessness data shows that single people account for a large number of those threatened with homelessness and proportionally are increasing. In 2015-16 43.9% of all those who were threatened with homelessness were single people. In 2016-17 this increased to 47.6%. With regard to provision of temporary accommodation, the proportion of single provided with assistance has remained consistently high with single people accounting for broadly 60% of all those provided with temporary housing by authorities in each quarter since April 2015.

25 Social Housing Grant is a grant given to housing associations by the Welsh Government to provide new affordable housing for rent or low cost home ownership.
26 Intermediate and market rented properties owned by housing associations. Market rented properties have rent levels the same as private renting. Intermediate rents are typically set at 80% (or less) of market rents.
27 Annual Survey of Hours and Earnings: 2016 provisional results, ONS, October 2016.

3.23 Associations we interviewed noted that authorities have often not clearly set out how they intend to work with their partners to deliver the Section 95 duty to cooperate. Protocols or frameworks that clearly set out expectations on associations are not in place and little work has been undertaken to quantify an authorities homeless service expectations. A number of association staff note that local homelessness partnership forums – which can provide an effective opportunity to review current performance and identify opportunities to improve how services are delivered – often do not meet or are ineffective at addressing problems. Because of poor engagement, authority homelessness teams are not clearly setting out their expectations of partners and authority leadership on homelessness is considered limited and ineffective.

3.24 The accuracy and flow of information between authorities and associations can often be inadequate. Several association staff members highlighted ongoing difficulties with the quality of referral data under nomination agreements. Too often key information from local authorities is inaccurate or absent which delays or stops a nomination for housing progressing. Given our findings – which echo recent research by Shelter Cymru in 2016[28] and Community Housing Cymru[29] and the Welsh Local Government Association in 2014[30] – there are ongoing challenges for partners delivering Section 95 of the 2014 Act.

28 Accessing and sustaining social tenancies: exploring barriers to homelessness prevention, September 2016, Shelter Cymru.
29 Community Housing Cymru is the representative body representing more than 70 not-for-profit housing associations and community mutuals in Wales.
30 Partnership working and homelessness: research on co-operation between housing associations and local authorities in respect of homelessness, Community Housing Cymru, Welsh Local Government Association and Welsh Government, March 2014.

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National Performance Indicators suggest some success in preventing homelessness, but authorities' performance varies too widely and there is an insufficient focus on demonstrating services are available to all

3.25 Prior to the introduction of the Housing Act 2014, local authorities in Wales collected data against a range of indicators across their homelessness and advice services collated and published nationally via StatsWales[31]. Data covered a range of inputs – for example, the number of individuals/families applying for homelessness assistance – and outputs such as the decisions made in respect of individual applications to an authority.

3.26 In developing the new homelessness legislation the Welsh Government recognised that new data sets and indicators are required to be able to evaluate the implementation of the 2014 Act[32]. New performance measures were introduced from April 2015 and focus on three key areas: firstly, whether the number of people threatened with homelessness is increasing or falling; secondly, how successful authorities are at preventing homelessness; and finally, whether use of temporary accommodation is increasing.

The number of people threatened with homelessness is rising but performance by authorities in successfully preventing homelessness is beginning to fall

3.27 Since the introduction of the 2014 Act the number of households threatened with homelessness who have approached local authorities for assistance has significantly increased, rising by almost a third (29.2%) from 7,218 in 2015-16 to 9,210 in 2016-17. The main threat of homelessness remains loss of rented or tied accommodation, parents no longer willing or able to accommodate, and breakdown in relationship with partners. Only the number of potentially homeless people discharged from an institution or care facility (eg hospital, residential home, army etc.), and those experiencing violence and harassment fell between 2015-16 and 2016-17. Appendix 7 provides a detailed analysis of the reasons people are threatened with homelessness at an all Wales level in 2015-16 and 2016-17.

3.28 With regard to preventing homelessness, there is a mixed picture on how effective authorities are – Exhibit 7.

31 StatsWales provides data on a range of services provided by public bodies in Wales.
32 Because of changes to the performance management framework, it is not possible to compare performance in 2015-16 and 2016-17 with data in previous years as the definitions changed and do not allow for a like-for-like comparison.

Exhibit 7 – Percentage of households successfully prevented from homelessness and homelessness rate per 10,000 households in 2015-16 and 2016-17 by local authority and all Wales average

There is a wide range of performance in preventing homelessness with the best authorities preventing over 70% of homeless cases. Conversely, poor performing authorities are delivering successful prevention actions in less than 50% of cases.

Isle of Anglesey (43.3) ↑
Conwy (40.5) ↓
Flintshire (37.4) ↓
Denbighshire (37.6) ↓
Wrexham (45.2) ↑
Gwynedd (30.3) ↓
WALES (42.9) ↓
Ceredigion (44.8) ↑
Powys (17.9) ↓
Carmanthenshire (36.4) ↑
Pembrokeshire (63.5) ↑
Blaenau Gwent (51.1) ↓
Torfaen (54.8) ↓
Monmouthshire (27.3) ↓
Swansea (78) ↓
Neath Port Talbot (32) ↑
Newport (42.3) ↓
Caerphilly (58.9) ↓
Bridgend (36.1) ↑
Cardiff (33.1) ↓
Rhondda Cynon Taf (34.9) ↑
Vale of Glamorgan (57.4) ↑
Merthyr Tydfil (25.6) ↑

(x)/(x)   Rate per 10,000 households in 2016-17

Change in performance: ↑ Improving
↓ Declining

Source: HOUS0415: Prevention of Homelessness by Area and Measure (Section 66), Annual data return to StatsWales. This data has not been audited.

Local authority	2015-16 (%)	2016-17 (%)
Gwynedd	84.5	77.5
Pembrokeshire	68.8	73.4
Caerphilly	78.2	73.3
Isle of Anglesey	60.1	72.8
Swansea	75.4	72.6
Ceredigion	69.3	70.8
Bridgend	64.2	66.6
Wrexham	59.4	64.2
Carmarthenshire	53	64.2
Rhondda Cynon Taf	48.7	63
Flintshire	75.9	62.8
Powys	71	61.3
Wales	64.5	62.1
Merthyr Tydfil	44.4	61.1
Monmouthshire	73.8	58.4
Conwy	70	57.9
Vale of Glamorgan	53.9	56.5
Neath Port Talbot	52.2	54.6
Denbighshire	55.1	54
Cardiff	70.6	52
Blaenau Gwent	58.6	51.9
Torfaen	64.1	49.8
Newport	62.5	49.3

3.29 The Exhibit shows that whilst the proportion of cases where homelessness has been prevented only marginally fell between 2015-16 and 2016-17, in some authorities there have been significant changes. Overall ten authorities have seen an increase in the percentage of homelessness they prevent and 12 have seen a fall in performance. The most notable improvements are in Merthyr Tydfil and Rhondda Cynon Taf where performance improved by over 15 percentage points. Conversely, four authorities record reductions in prevention work of roughly 15 percentage points, most notably Cardiff which has seen a 20 percentage points decline in prevention work. In respect of the rate of successful preventions per 10,000 households – the probability or ratio of a certain outcome happening for the wider population in an area – performance is similarly wide ranging. In 2016-17, Powys are preventing homelessness for roughly 18 households per 10,000 population compared to Swansea who successfully prevent homelessness for 78 households out of every 10,000 households.

3.30 Local housing authorities have a duty to secure temporary accommodation for homeless households. For example, households might be placed in temporary accommodation pending the completion of inquiries or they might spend time waiting in temporary accommodation after a homeless application is accepted until suitable secure housing becomes available. We found that the number of households placed in temporary accommodation continues to rise in Wales, by 7.5% from 1,872 households at the end of June 2015 to 2,013 households at the end of March 2017. Appendix 8 provides a more detailed analysis of the change in temporary accommodation by quarter in 2015-16 and 2016-17.

3.31 Taking these three key measures of performance together, the data shows that the number of people who are threatened with homelessness in Wales is increasing, successful prevention work is declining, and use of temporary accommodation is growing. Whilst this information only covers two years of activity, our analysis suggests that authorities face some significant challenges in managing and preventing homelessness. This is echoed by recent research by Shelter Cymru[33] which suggests that the official statistics undercount the level of homelessness by roughly 3,000 households in 2016-17.

33 Reasonable steps: experiences of homelessness services under the Housing (Wales) Act 2014, Shelter Cymru, 2016.

3.32 Whilst StatsWales data on homelessness is useful to measure aspects of performance, the current focus of activity does not always give an indication of either the quality of the service provided, or the success of local authority interventions in addressing homelessness. For example, performance indicators are still too limited to provide a robust and meaningful picture of how 'successful' homelessness services are in dealing with the complex needs of clients, and too often judge performance on short-term inputs and outputs not longer-term impact and improvement for individuals.

3.33 A small number of authorities also acknowledge they have some practical challenges in effectively measuring and managing their homelessness performance. Three authorities state that they do not have sufficient resources and capacity to review performance, and five that they are either in the process of or planning to upgrade their homelessness IT systems to be able to record and monitor their homelessness performance more accurately.

Local authority performance management arrangements do not focus sufficiently on demonstrating that services are provided equally for all citizens which undermines their ability to fully meet the Public Sector Equality Duty

3.34 The Equality Act 2010 brings together and replaces previous anti-discrimination laws with a single Act. It aims to make it more consistent, clearer and easier to follow in order to make society fairer. The Equality Act 2010 aims to remove inconsistencies and make it easier for people to understand and comply with it. An important aspect of the Equality Act 2010 is the creation of the public sector equality duty.

3.35 Under the Public Sector Equality Duty (PSED), listed bodies are required to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the act. Listed bodies must also advance equality of opportunity between people who share a relevant protected characteristic and those who do not. They should also seek to foster good relations between people who share a protected characteristic and those who do not. Public authorities are listed in Schedule 19 of the Equality Act and include local authorities.

3.36 The broad purpose of the PSED is to integrate consideration of equality and good relations into the day-to-day business of local authorities. Importantly, the PSED requires authorities to consider how a function can affect different groups in different ways. Failure to do this can contribute to greater inequality and poor outcomes simply because services are configured and delivered in ways that people with protected characteristics are unable to use them.

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3.37 Key to complying with the PSED is to ensure that there are robust monitoring and evaluation arrangements in place. By monitoring protected characteristics data, local authorities should ensure that access to services is equal to all, and that those most vulnerable can be identified and treated appropriately. The findings of our review suggest that there are some significant weaknesses in current arrangements, and some authorities are not complying with their responsibilities under the PSED.

3.38 Exhibit 8 below summarises the findings of the Welsh Government's survey of local authorities on the implementation of the 2014 Act in respect of people with protected characteristics. Current performance falls short of the requirements of the Equality Act 2010 and local authorities are not able to consistently demonstrate how their homelessness services meet their PSED responsibilities.

Exhibit 8 – Coverage of local authority monitoring systems for homelessness people and those threatened with homelessness with protected characteristics.

Protected characteristics, as defined in the Equality Act 2010	Number of Welsh local authorities collecting this information
Age	15
Disability	15
Gender reassignment	12
Marital status (including Civil Partnership)	11
Pregnancy and maternity status	15
Race (includes race, colour and nationality – citizenship, ethnic or national origin)	14
Religion or belief	12
Sexual orientation	13
No equalities data collected	6

Source: Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report, 8 August 2017, Welsh Government.

Part 4

Local authorities and partners need to focus on tackling the underlying causes of homelessness but are not giving this sufficient focus in their strategic responses

4.1   In preceding sections of this report we have set out how local authorities are responding to the challenge of preventing homelessness. The Housing Act (Wales) 2014 fundamentally changed the statutory responsibilities of local authorities by shifting the focus of their work away from investigating and assisting only those who met strict criteria, to preventing homelessness wherever possible.

4.2   The rationale and benefits of prevention work is very clear. For homeless people there should be less personal disruption and uncertainty with local authority support and assistance seeking to maintain occupation where possible in the current home. For local authorities, there should be a more effective use of resources to better manage demand through proactive engagement with clients at a far earlier stage, and before they present for assistance in crisis.

4.3   Despite the changes made by the 2014 Act, the timing of local authority responses are also still focussed at the point when people are in crisis and losing their home. The underlying causes of homelessness – the reasons why certain groups in society are more at risk than others – remain unchallenged.

4.4   In this section of the report we consider how well positioned local authorities are to deliver sustainable solutions that prevent homelessness from occurring. The Wellbeing of Future Generations Act 2015 provides an opportunity for authorities and partners to take a long-term, preventative approach working in collaboration through integrated services that involve and meet citizens' needs. There are some important lessons for public bodies to draw from the approach to homelessness prevention in how they manage demand in other areas of activity.

Local authorities and partners continue to deal with the symptom of homelessness not its cause

4.5   Homelessness is often caused by a complex interplay between a person's individual circumstances and adverse 'external' factors outside their direct control. Personal factors such as a lack of qualifications, lack of social support, debts – especially mortgage or rent arrears – poor physical and mental health, and getting involved in crime at an early age. Family background is also recognised as a contributory factor particularly relationship breakdown and disputes, sexual and physical abuse in childhood or adolescence, having parents with drug or alcohol problems, and previous experience of family homelessness[34]. These problems can also build up over years until the final crisis moment when a person becomes homeless.

34 Tackling Homelessness: A Rapid Evidence Review, Public Policy Institute for Wales, February, 2015.

4.6　The impact of demand for public services and dependency on them can be generational and require long-term commitment and focus from public bodies to address. For example, health inequalities, poverty, educational attainment, and dealing with long-term unemployment. Homelessness can be caused by structural issues, social and economic factors often outside the control of the individual or family concerned such as:

a　poverty, which is often linked to unemployment or low wages;

b　a lack of affordable housing and wider local and national policies for housing on allocations, exclusions and tenancy management;

c　wider national policy developments, such as the closure of long-stay psychiatric hospitals; management of immigration and asylum; decisions on discharge from prisons and the armed forces; and

d　UK government welfare polices – particularly the restructuring of the whole system of working age benefits with the introduction of Universal Credit, the benefit cap, single room subsidy and revised sanctions.

4.7　Research in Wales and across the UK[35] shows that these structural and individual factors are often interrelated and are the underlying cause of homelessness. Individual issues can arise from structural disadvantages such as poverty or lack of education. While personal factors, such as family and social relationships, can also be put under pressure by structural forces such as poverty. These are ultimately the reasons why certain individuals and groups and in society are more at risk of becoming homeless than others. Homelessness is consequently the result of service failure, wider-economic impacts and a complex range of generational problems.

35 The homelessness monitor: Wales 2015, Crisis, August 2015; and Tackling homelessness and exclusion: understanding complex lives, Homeless Link, September 2011.

Homelessness is often influenced by decisions that public bodies in Wales cannot affect or prevent

4.8   Addressing these structural issues also requires long-term policy solutions such as changes in the housing benefit system, the building of more affordable homes and joined up policy making across housing and other services. Resolving the impact of policy[36] choices on homeless people can be complicated as responsibilities for different programmes, funding streams and organisations are split within the UK and not always devolved to Wales. Demand for public services can therefore be created as a result of individual policy choices; by unintended consequences of policy choices; and/or exacerbated where different policy decisions are poorly framed or not aligned and work against each other.

4.9   Tackling complex problems like homelessness clearly benefits from alignment of policies to maximise the positive impact of some choices and limit the unintended consequences of others. However, where policies do not complement each other, problems can occur. Exhibit 9 shows the complexity of policy devolution in Wales. The Welsh Government is responsible for many areas of daily life in Wales. These areas include: education, health, local government, environmental health, economic development and social services. However, the UK Government is still responsible for certain public services in Wales, for example immigration, policing, prisons and the justice system. Most importantly for homelessness it is the Westminster Government which sets the policy for tax and welfare benefits.

36 Generally speaking public policy is what the government chooses to do, or not to do. It is a decision made by the government to either act, or not act in order to resolve a problem. Public policy is a course of action that guides a range of related actions in a given field. They rarely tackle one problem, but rather deal with clusters of entangled and long-term problems.

Exhibit 9 – Policy responsibilities of the UK and Welsh Governments that affect homelessness in Wales.

Areas of policy making that can impact upon a local authorities ability
to prevent homelessness

Welsh Government responsibilities

- Social housing
- Homelessness
- Environmental health
- Social Care Policy
- Economic development

- Health
- Education
- Regulation of housing associations
- Supporting People
- Local Government

UK Government responsibilities

- Welfare benefits
- Immigration and asylum
- Taxation
- Justice system

- Policing
- Prison services
- Armed forces
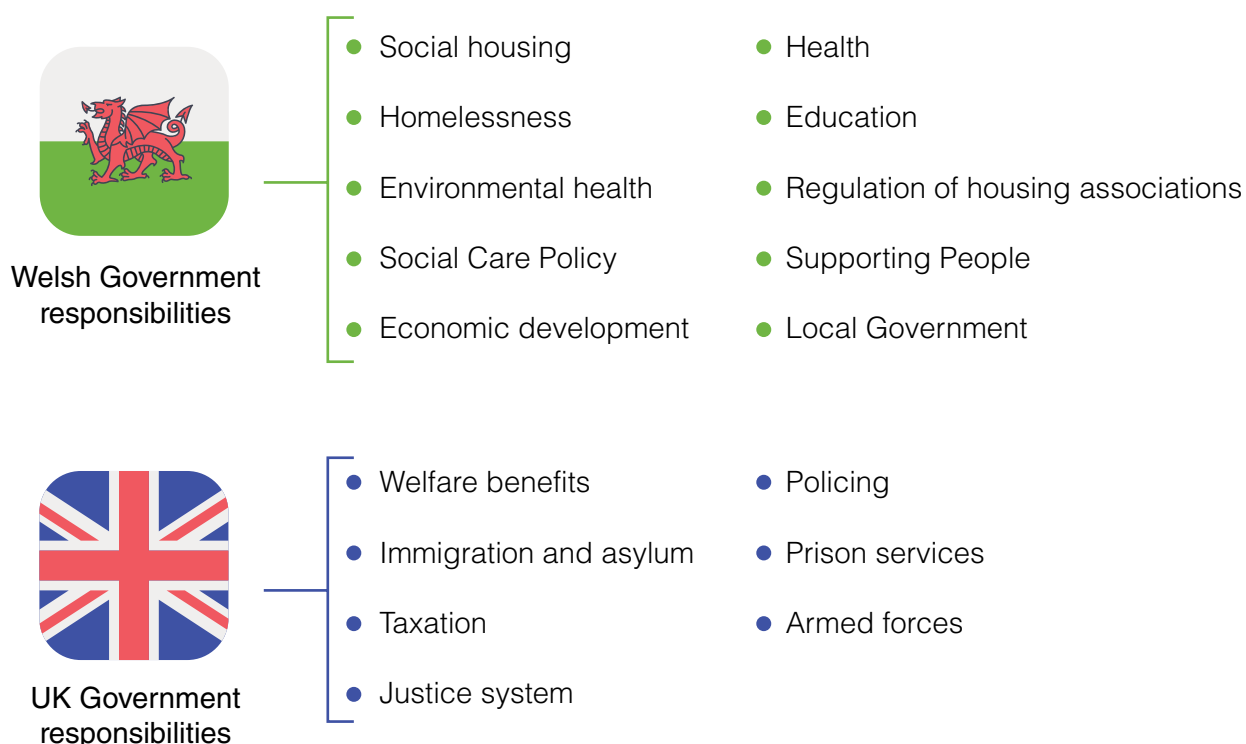
Source: Wales Audit Office analysis.

4.10 One of the significant impacts of the 2014 Act for the local government in Wales is the broadening of responsibilities to single people. Local authorities are now required to provide help to everyone at risk or homelessness, a significant departure from the previous system where many single homeless people were not provided with the same level of support and assistance as they receive now. As our research identifies, single people now account for almost half of those who are threatened with becoming homeless who approach local authorities for assistance and nearly two-thirds of those who occupy temporary accommodation. Single people account for a considerable amount of local authority's homelessness work.

4.11 Whilst the Welsh Government emphasises the importance of local authorities seeking to meet the needs of homeless single people through better use of the private rented sector, and delivery of a broader range of options to resolve homelessness, this is made difficult because of the impact of conflicting policy choices of the UK Government. These are policies made in Westminster which impact public bodies and citizens in Wales, but neither the Welsh Government nor local authorities are able to influence these. In particular, as noted above in paragraphs 3.22 and 3.23, the difficulties of addressing single homelessness, especially young people aged between 25 and 34 years old, who present a particular challenge for authorities and their partners.

Addressing homelessness demand is often seen as a single body's duty rather than a wider public service responsibility

4.12 To tackle the intricate problems of homelessness requires a response from a range of public and third sector bodies not just local authorities. Local authority housing service cannot resolve the complex inter-related issues of homelessness alone. Homelessness is more than a housing problem with much of what causes homelessness being outside the control and influence of local authorities' homelessness services. However, despite this, it is the local authority which has the statutory duty to prevent and address homelessness.

4.13 When developing the 2014 Act the Welsh Government recognised that tackling homelessness is wider than a local authority housing service and a multi-agency response is required to be truly effective. Hence the decision to create specific duties under Section 95 for local authority social services and housing associations to co-operate with homelessness services. However, as noted above, the duty to cooperate is not working consistently across all of Wales and the key partners that can contribute to tackling and preventing homelessness from occurring are not always effectively supporting this outcome.

4.14 Exhibit 10 sets out the complicated picture of policy and delivery with an increasing number of services and functions being influenced by and dependent upon others. Whilst it is positive that the current statutory framework seeks to encourage some agencies to manage demand and support the housing outcomes of homeless people, it does not go far enough. It falls short of being a fully preventative multi-agency approach that goes beyond housing interventions, and it needs to be much broader than the duty to cooperate placed on local authority social services and housing associations. Local authorities and others contribute to tackling homelessness in a variety of other indirect ways. For example, by encouraging local economic development; as a major employer in the area; through the development of new infrastructure, homes and transport; and, most importantly, as the key agency in Public Service Boards[37] and other areas of multiagency partnership work focused on homelessness.

Exhibit 10 – The interlinkage between public bodies in the delivery of services to citizens.

Mainly a single public body response

- Recycling and managing waste
- Planning applications
- Home to school transport
- Transport and highways maintenance
- Strategic Housing policy
- Highways
- Land charges

Led by one public body but influenced by others

- Housing adaptations
- Culture, heritage, sport and leisure
- Public protection services
- Environmental health
- Economic development
- Adult and children's social care
- Lifelong learning

Multi-agency response is only solution

- Community safety and anti-social behaviour
- Homelessness
- Community resilience
- Equality and community cohesion
- Substance misuse
- Poverty reduction
- Enterprise and skills

Source: Wales Audit Office analysis.

37 The purpose of Public Services Boards is to improve the economic, social, environmental and cultural well-being in its area by strengthening joint working across all public services in Wales.

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4.15 Whilst becoming homeless is a visible 'symptom' of a homeless person's moment of crisis, the provision of housing or support to maintain housing is still a 'crisis' response. Much of the current work of local authorities in preventing homelessness is still reactive with services focussed on dealing with people when they are in crisis rather than stopping them getting into crisis in the first instance. For local authorities and their partners to tackle the fundamental and underlying causes of homeless requires them to take a long-term strategic approach.

4.16 From our review we have identified three levels of sustainable prevention work that influence the levels of demand for a service – Exhibit 11. We classify most authorities as operating at level one or two, focussing resources on short to medium-term responses but dealing with people who are generally in crisis. Responses are mostly driven by a single service perspective and collaboration operates at the margins of activity rather than centrally driving decisions. Consequently, prevention responses do not make the most of all resources within the local authority and with partners to build solutions that are aligned to manage demand and reduce long-term dependency on services. Overall, we have concluded that no authority has yet progressed to level three taking a truly long-term preventative approach focussing services on the enduring societal issues that create homelessness.

Exhibit 11 – The sustainability of approaches to managing demand for homeless services.

A RESPONSIVE APPROACH TO ACUTE DEMAND

Local authorities respond to people who are homeless or threatened with homelessness at the point they are under threat of losing their home. Service users are generally in crisis and seek help from local authorities and their partners when other options have failed or are realistically not available to them. Services are configured to deal with people in crisis and geared to help people in an emergency. Prevention and demand management work is limited. Partnership working between the local authority and partner organisations is limited to operational responses.

A STRUCTURED APPROACH FOCUSSED ON UP-STREAMING MANAGEMENT OF DEMAND

Local authority services are configured to engage with potential homeless people much earlier and before people are threatened with homelessness. Potential triggers that cause homelessness are known and shared widely. Homelessness services are arranged to respond quickly and efficiently to address the needs of high risk groups and individuals, sometimes before they are in crisis. Early contact and a focus on practical solutions are the focus of services. Partnership working between the local authority and partner organisations is developing but each organisation retains its own approach to homelessness.

A PLANNED PREVENTION APPROACH WHICH STOPS DEMAND FROM OCCURRING

Local authorities and their partners focus activity on changing behaviours rather than seeking solutions for people in a crisis. There is a shared approach to addressing homelessness across all Public Service Board organisations. The characteristics of those at risk of homelessness are known. Actions to address demand are planned and other public services are configured to address societal and structural problems that place people at risk of becoming homeless well in advance of their crisis occurring. Overtime, less people become homeless and there is less demand for homeless services.

SHORT-TERM   MEDIUM-TERM   LONG-TERM

Source: Wales Audit Office.

4.17 To achieve a truly sustainable and long-term approach that prevents homelessness from occurring requires political buy-in. Authorities need a clear vision and strategy that transcends public bodies which understands what people need; what their demands are; and consider the most effective way of reducing demand and any over-dependency on public bodies. It is vital that local politicians lead a new conversation with citizens that is more collaborative. Citizens and users need to be ready and prepared for any changes and public bodies need to recognise that no single body can deal with demand, they need to collaborate and it will require joint processes and systems.

4.18 Sections 50 to 52 of the Housing (Wales) Act 2014 requires authorities to periodically undertake homelessness reviews and produce homelessness strategies by April 2018. The 2014 Act requires authorities to assess the current and likely future levels of homelessness in a local authority area; the range of current provision to prevent homelessness; current provision of suitable housing and support; and the resources available within the authority and from partners to tackle homelessness. The findings of the review should be used to formulate a homelessness strategy which sets out the actions and plans to prevent and address homelessness within the authority area.

4.19 A recognised weakness of previous local authority homelessness strategies is the lack of attention on future demand. Needs assessments and strategic planning too often concentrated on current service pressures and the actions required to address these short-term acute issues. Little focus was given to medium to long-term issues. Few authorities focus on understanding the causes of demand, how to manage demand or how to equip citizens to become more self-resilient. This is important. By increasing self-resilience, and changing where actions are focussed, citizens will be better able to manage their issues without recourse to authority services. We did identify some early policy development that recognises the need to shift from reacting to demand, to preventing demand from arising.

4.20 We have highlighted above the short termism of authorities and their partners in preventing homelessness. Few good examples exist of local authorities taking a strategic and holistic approach to planning prevention and demand management activity to address homelessness over the longer-term. Often this is because the financial case for addressing homelessness demand is largely built on predictive modelling rather than real evidence; fully developed examples are rare. In addition, and as noted in paragraph 1.17 many prevention and demand management strategies are initiative-led rather than a collective and strategic plan of action. In addition, longer-term forecasting of demands and community needs is generally a weaker area despite being encouraged by the Welsh Government to feature in Wellbeing Assessments.

4.21 However, many authorities are still not focussing on addressing these weaknesses. For example, 13 authorities responding to the Welsh Government survey on implementation of the 2014 Act stated they have experienced an increase in demand for their homelessness services. Our review of well-being assessments found that whilst authorities are aware that demand on homelessness services is going to increase, many Public Service Boards have not set out how services might be designed or re-aligned to either cope with the increase in overall demand, or how public bodies will collectively tackle the underlying causes of demand. Only three well-being assessments specifically mentioned self-reliance and independence amongst residents as a priority to help reduce demand on services, but even in these limited examples there was no detail on how this will be achieved. To enable a long-term preventative focus on addressing homelessness authorities need to focus on the broader issues that create demand to truly prevent people becoming homeless.

4.22 Given authorities have until April 2018 to complete their homelessness reviews and produce their strategies, we found that at the time of our fieldwork few had made significant progress. Denbighshire County Council completed its review of homelessness services in 2016 publishing the findings online following detailed engagement with stakeholders, including service users. The authority plan to use the findings of their review to develop their homelessness strategy. To support development of its strategy the authority created a multi-agency homelessness forum to guide its work on tackling homelessness. This forum has responsibility for developing and implementing the strategy and to address the key causes of homelessness.

Denbighshire County Council – homelessness strategy development

Through its homelessness review, the authority consulted partners and stakeholders to identify and agree the key objectives to tackle and prevent the main causes of homelessness. The review was used to develop the authority's homeless strategy. The strategy focuses on prevention, securing more accommodation and access to support services and aims to:

- ensure that suitable accommodation is and will be available for people who are, or may become homeless;

- collaborate with NHS, Criminal Justice and Community Safety agencies to meet the needs of people and households who are at risk of homelessness;

- ensure that satisfactory support is available for people who are, or may become homeless; and

- plan homelessness services regionally where appropriate, taking account of the emerging changes to Local Government boundaries.

The authority recognises that the key approach to community support is the change in emphasis from dependence to enabling people to live independently, with control and choice over their own needs and solutions. Its homelessness strategy and associated action plan reflects this principle and specifies how the authority's Senior Leadership Team and relevant Members will be kept informed and engaged throughout its implementation.

4.23 At the time of our on-site work most fieldwork local authorities had not started their homelessness reviews. A small number highlighted that they did not have sufficient capacity to focus on reviewing and developing a strategic response to homelessness. This lack of capacity comes at a time when homelessness is increasing.

There are lessons to be learnt from how local authorities have responded to preventing homelessness in the design and delivery of other services to better manage demand

4.24 There are some important lessons for public bodies to draw from the approach to homelessness prevention in how they manage demand in other areas of activity. Many of these align with statutory responsibilities of the Well-being of Future Generations Act 2015 which provides an opportunity for authorities and partners to take a long-term, preventative approach working in collaboration through integrated services that involve and meet citizens' needs.

4.25 We found from our review of homelessness services that it is important for authorities to take a strategic focus on managing demand. Public bodies need to avoid narrowly defining potential demand and should not just concentrate on the services they provide but on how public bodies collectively work together to stop demand arising in the first instance. With this in mind, Public Service Boards offer an opportunity to focus on shared priorities by collaborating and then integrating services to combine efforts. Positively, authorities are starting to focus on the strategic management of demand as highlighted in the following good practice (Appendix 8 includes further examples of how public bodies are seeking to increase citizens' resilience to better manage demand).

Good practice examples in how some local authorities are seeking to address demand

The City and County of Swansea Council

places wellbeing and demand management within its Prevention Strategy for 2017-20. The strategy forms part of its corporate transformation programme and highlights the authority's priority "supporting people to become resilient and achieve outcomes that they want to see in their own lives, which will in turn reduce demand on services." The strategy refers to data up to 2030 and considers what has worked in Swansea and elsewhere in the UK, and different types of demand that need to be modeled and addressed. This provides a good starting point for the authority to manage its own behaviour and that of its customers.

Denbighshire County Council

held a 'county conversation' looking at what services people want and what 'social capital' exists in local communities to both support the authority to sustain services, but also influence changes in behaviour amongst service users. Demand management is also a reoccurring theme in local authority transformation models. Blaenau Gwent County Borough Council's Customer Transformation Strategy for 2016-21 places demand management principles and customer insight at the heart of its transformation of customer service and access principles.

4.26 In considering the long-term strategic design and delivery of services authorities need to avoid misaligning or designing services that create blockages and 'failure demand' in delivery of homelessness services. Part 2 above highlights some of the demand problems in delivery of homelessness services created by poor design. Local authorities need to therefore carefully consider how they design and deliver services to:

a   align policy and manage demand, public services need to work together and agree priorities based on broad ranging, up to date and good quality data and use this information to direct where they should spend their monies focusing on longer-term investments;

b   ensure staff have the right skills to deliver preventative services by equipping staff to focus on problem solving, negotiating, mediating and influencing people;

c   organise services to efficiently and consistently engage with service users as quickly as possible;

d   make certain good quality, accessible and accurate advice and information is made widely available on what people are entitled to and what they will not receive – our survey findings highlight that service users assume authorities provide more assistance and help than they can and often do;

e   make best use of digital services and ensure online services are accessible and encourage usage through good connectivity and a good user experience;

f   avoid gate keeping and ensure services are down streamed to engage as early as possible with potential service users to reduce demand;

g   ensure the contribution of all organisations and all funding streams are aligned and focused on the common issues that communities and their public services are facing;

h   ensure a broad range of options to address demand rather than single service solutions; and

i   take an holistic view to service delivery and ensuring public bodies rather than single agencies take responsibility for addressing demand.

4.27 Ultimately, preventing ongoing demand for services represents good value for money. To work effectively requires a minimum level of agreement and understanding on how best to deliver services. However, this needs public bodies to embrace new ways of working and longer-term thinking[38]. Exhibit 12 illustrates the key factors we have identified from our review that should be considered by authorities in taking a strategic approach to managing demand within a defined service. The full range of information is set out in Appendix 10. This list is not exhaustive but does provide some clear principles to help shape management of demand.

Exhibit 12 – Key considerations for local authorities in managing demand.

KEY ASPECTS OF MANAGING DEMAND

We know what we need to change and have agreed joint priorities to achieve improvement

We know services are making the right impact

We work well and collaborate with others

Citizens know what they are entitled to and where to go for help

Our services are organised to do what we need to do quickly and efficiently

We know what we must do
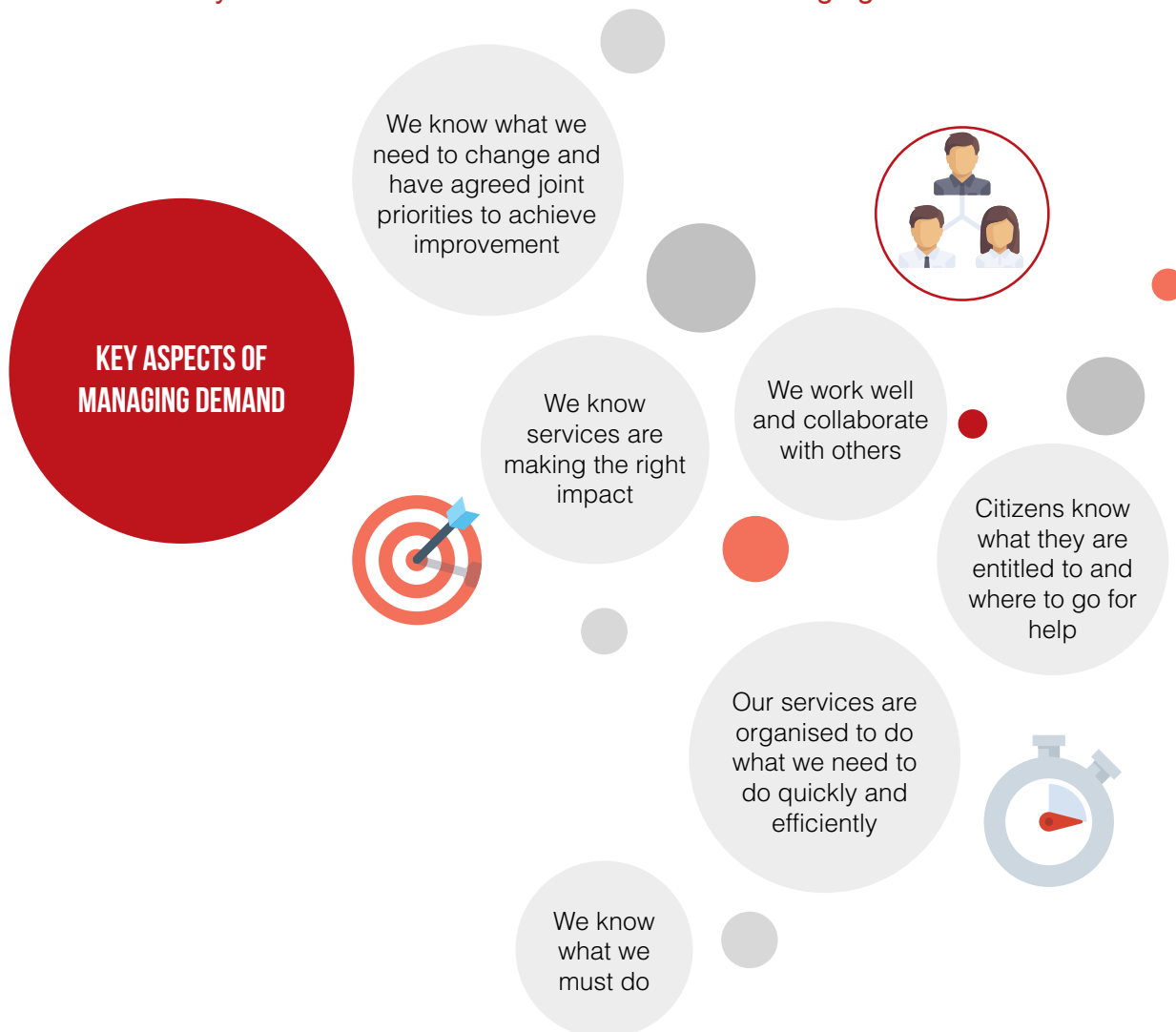
Source: Wales Audit Office.

38 Guidance from April 2013 developed by Public Health Wales in partnership with the Welsh Government entitled Improving the Health and Well-being of Homeless and Specific Vulnerable Groups Standards, recognizes that leadership is critical in driving improved health outcomes for homeless and vulnerable groups.

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Appendices

Appendix 1: Study methodology

Review of literature

We have reviewed a wide range of documents and media, including:

- Welsh Government policy and guidance documents;

- local authority documents including application forms, advice leaflets, committee papers, plans and strategies; and

- research and evidence on homelessness services produced by a range of representative bodies including the Welsh Local Government Association, Shelter Cymru and Homeless Link.

Data analysis

We have analysed the data collected from local authorities by the Welsh Government published on StatsWales covering local authority performance in respect of homelessness and local authority revenue expenditure on homelessness and housing advice services. The data drawn from individual returns from each authority in respect of homelessness performance has not been audited for accuracy. Revenue outturn data was audited and the information we present in this report on expenditure by local authorities on homelessness and housing advice services is different to the information published by StatsWales.

Local authority fieldwork

We visited five local authorities in Wales in 2016-17. The local authorities selected represented a mix of authorities which are geographically spread across Wales and of different population sizes. These were:

- Bridgend County Borough Council

- Carmarthenshire County Council

- Denbighshire County Borough Council

- Merthyr Tydfil County Borough Council

- City of Swansea Council

During the visits, we interviewed a range of local authority staff, housing association staff, third sector organisations, members of public service boards and elected members.

National fieldwork

We undertook a range of Interviews with key stakeholders and opinion formers including the Welsh Government; opinion formers and policy thinkers Shelter Cymru, the Wallach, Cymorth Cymru, the Equalities and Human Rights Commission, Welsh Local Government Association and University of Wales. We also held a focus group with the local authority homelessness network.

Surveys

We commissioned a qualitative telephone survey of citizens to ascertain how they view local authorities, engage with, and use public services. This focussed on how well organisations prevent demand, and equip citizens to make the right choices to address or prevent their needs arising. The survey was completed between November 2016 and January 2017. 555 people living in all 22 local authorities in Wales completed the telephone survey and the survey was reported to the Wales Audit Office in March 2017. The exhibit below shows the purpose of the survey.

Scope of the citizens' survey

To gather people's views about:

- the quality of services provided by local authorities;

- people's overall satisfaction with local authority services;

- the methods people use to contact their local authority;

- how people find out information about their local authority;

- the reasons why people had contacted their local authority in the previous 12 months;

- the effectiveness of local authority responses to people's requests for service and information;

- people's perceptions of changes to local authority services; and

- people's views on how local authorities should design and plan services in the future.

We had planned to conduct a specific survey of local authority managers on prevention and demand handling within homelessness services. Given the Welsh Government was also undertaking a survey of local authorities on implementation of the Housing (Wales) Act 2014 we did not progress with our survey to avoid duplication of activity. The Welsh Government provided us with their detailed findings and we have used this information in our review.

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Appendix 2: The different duties for how authorities manage homelessness in the countries of the United Kingdom

The countries of the United Kingdom have different statutory frameworks that set out authorities' duties to address homelessness. The focus on prevention in Wales is very different to other parts of the United Kingdom.

The legislation that underpins how homelessness is addressed in Great Britain and Northern Ireland

England

The Housing Act 1996 requires local authorities to assess what assistance they should provide to a homeless or potentially homeless person who presents to a local authority for assistance. The local authority assesses:

- whether the applicant is homeless;

- if so, whether the applicant made themselves homeless intentionally;

- if they were unintentionally homeless, if they have a local connection with the local authority to which they made the application; and

- whether the household is in a priority need category.

Only unintentionally homeless, priority need households are owed a main duty by their local authority to secure settled accommodation.

In 2018 this legislation will be replaced by the requirements of the Homelessness Reduction Act 2017 which introduces a range of new duties on local authorities replicating many of the duties in the Housing (Wales) Act 2014 reforming the homelessness duties placed on local authorities to ensure that at-threat households receive better help quicker and homelessness is prevented where possible.

Northern Ireland

Under the Housing (NI) Order 1988, the Northern Ireland Housing Executive (NIHE) has the statutory responsibility for addressing homelessness.

These duties require the NIHE to assess those that present as homeless to determine whether they meet the four tests of – eligibility; homelessness; priority need; and intentionality.

Any household that meets these four tests is accepted as a 'Full Duty Applicant' and will be owed a full housing duty.

Scotland

Part II of the Housing (Scotland) Act 1987 (as amended by the 2001 and 2003 Acts) sets out the powers and duties of local authorities in dealing with applications from people who are homeless or threatened with homelessness.

Homeless/potentially homeless persons are required present to a local authority for assistance and the council assesses:

- whether the applicant is homeless;

- if they have a local connection with another authority in Scotland, England or Wales; and

- whether the applicant made themselves homeless intentionally.

Priority Need groups were abolished under the Homeless (Abolition of Priority Need Test) (Scotland) Order 2012 in November 2012. From 31 December 2012 all unintentionally homeless households are entitled to settled accommodation.

Wales

The Housing (Wales) Act 2014 requires local authority to help everyone at risk of homelessness rather than just those in priority need groups and local authorities must:

- help anyone threatened with homelessness within next 56 days;

- provide help to homeless persons to help them secure a home; and

- focus on preventing homelessness in the first instance.

There are duties placed on Housing Associations and Social Services to co-operate with local authority housing services in carrying out their homelessness duties.

There is also a new power rather than a duty to apply the intentionality test and new powers for local authorities to discharge their homelessness duties through finding accommodation in the private rented sector.

Source: Wales Audit Office analysis of Homelessness Duties in each of the countries of the United Kingdom.

Appendix 3: Expenditure on homelessness and housing advice services by local authority 2009-10 to 2015-16 in absolute (cash) and real terms

The amount spent by local authorities on homelessness and housing advice services in the last seven years

Local Authority	2009-10 (£'000)	2010-11 (£'000)	2011-12 (£'000)	2012-13 (£'000)
Blaenau Gwent	419.504	519.68	434.584	377.883
Bridgend	1,384.127	1,270.981	1,006.296	996.609
Caerphilly	809.2	684	710	897.951
Cardiff	8,053	7,121	5,616	3,999
Carmarthenshire	2,670.556	1,473.219	1,715.154	2,079.044
Ceredigion	806	887	737.647	729.202
Conwy	2,295.85	2,101.72	1,928.592	1,723.948
Denbighshire	866	828	747	822
Flintshire	1,017	939	981	1,175.317
Gwynedd	1,189	1,823.603	1,797.574	1,884.677
Isle of Anglesey	932	1,588	1,125	1,106
Merthyr Tydfil	361.008	344.515	264.3793	366.9204
Monmouthshire	1,454	1,265.802	842.121	634.417
Neath Port Talbot	1,051	1,027.057	1,308	1,339.025
Newport	1,928.757	1,833.022	1,963.46	2,230.607
Pembrokeshire	1,154	805	572	578
Powys	675.212	520.276	489.343	469.337
Rhondda Cynon Taf	920.687	882.147	877.302	959.352
Swansea	1,114	6,188	807	823
Torfaen	1,776	2,071	1,365	1,251
Vale of Glamorgan	792	831	979	954
Wrexham	1,237.132	1,430.474	1,721.1	1,676.509
TOTAL	32,906.03	36,434.5	27,987.55	27,073.8

The amount spent by local authorities on homelessness and housing advice services in the last seven years (continue)

2013-14 (£'000)	2014-15 (£'000)	2015-16 (£'000)	% Change (+/-)	Real terms % change
332.542	339.159	487.548	16.2	4.1
1,060.892	1,089.952	1,090.439	-21.2	-29.4
1,510.2	1,472.65	1,040	28.5	15.1
2,474.864	2,131	2,106.182	-73.8	-76.6
2,013.975	1,872.477	2,046.11	-23.4	-31.4
647.5	776.869	900.877	4	0.1
1,455.035	1,378.368	1,512.164	-34.1	-41
787	957	1,221	41	26.3
1,036.598	1,172.131	1,665.956	63.8	46.7
1,632.314	1,593.154	1,607.482	45.6	21.1
1,221	924	809	-13.2	-22.2
409.065	483.101	603.349	67.1	49.7
652.931	623.977	782.084	-46.2	-51.8
1,555	1,138	1,284	22.2	9.4
2,367.556	2,467.426	2,919.787	51.3	35.6
558	507	594	-48.5	-53.9
643.703	471	547	-18.9	-27.4
1,283.147	1,201.254	1,055.039	14.6	2.6
899	876	1,297	16.5	4.3
1,156	992.1519	1,209.206	-31.9	-39
501	725	1,016	28.3	14.9
1,298.544	903.4013	1,267.68	2.5	-8.2
25,495.87	24,095.07	27,061.9	-17.7	-26.3

Appendix 4: SOCITM Better Connected Results for Welsh Local Authorities 2016-17

The SOCITM ratings for each local authority in Wales

Council	Better connected rating	Mobile standard	Accessibility
Flintshire	3	Pass	Pass
Wrexham	3	Pass	Pass
Powys	3	Pass	Pass
Neath Port Talbot	3	Pass	Pass
Cardiff	3	Pass	Pass
Rhondda Cynon Taff	3	Pass	Pass
Torfaen	3	Pass	Pass
Newport	3	Pass	Pass
Denbighshire	3	Pass	Fail
Swansea	3	Pass	Fail
Caerphilly	3	Pass	Fail
Gwynedd	2	Pass	Pass
Pembrokeshire	2	Pass	Pass
Vale of Glamorgan	2	Pass	Pass
Merthyr Tydfil	2	Pass	Pass
Monmouthshire	2	Pass	Fail
Blaenau Gwent	2	Fail	Fail
Conwy	2	Fail	Fail
Isle of Anglesey	1	Fail	Pass
Carmarthenshire	1	Fail	Pass
Bridgend	1	Fail	Pass
Ceredigion	1	Fail	Fail

Source: SOCITM Better Connected.

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Appendix 5: Wales Audit Office assessment of information provided on council websites for homelessness, school transport and bulky waste collections 2016-17

We used a five point scale ranging from very poor to very good to rate the information across the following 13 aspects. The figures in this exhibit show the number of local authorities we rated as scoring very good or good across the 13 aspects

Key line of enquiry	Wales Audit Office assessment of number of authorities complying with the standard		
	Homeless services	School transport	Bulky waste
Signposting – Is content easy to find? Quality of search engine	17	21	21
Clarity – Are instructions easy to understand?	20	19	21
Completeness – Is all the information required by users available?	16	17	16
Timeliness – Is the information up to date?	3	9	5
Accessibility – Is the information available in other languages, large font or alternative formats? Does it meet accessibility and quality standards?	18	18	18
Support – Can users contact/ speak to the authority if need be?	17	12	19
Effectiveness – Is the advice and information provided effective?	9	10	12
What is provided – Is it clear what the service can and cannot provide to users?	16	18	16
Problem solving – Does the information provided result in a solution to users' problems?	14	18	19

Key line of enquiry	Wales Audit Office assessment of number of authorities complying with the standard		
	Homeless services	School transport	Bulky waste
Reducing demand – Does the information provided/allow users to apply for a service without any recourse to the authority?	9	16	16
Appropriate links – Does the information direct users to other providers?	15	2	18
Application process – Does the authority allow people to apply online for the service they are trying to access?	3	16	13
Call handling – Does the authority use a central call handling system?	19	13	17

Source: Wales Audit Office, review of local authority websites.

Appendix 6: The range of options used by local authorities and their partners to prevent an applicant from becoming homeless

Services provided to prevent an applicant from becoming homeless under
Section 66 of the Housing (Wales) Act 2014

Homelessness options	Provided by local authorities		Provided by others		No provision	Increase in provision since 2014 Act
	Yes	No	Yes	No		
Outreach	12	10	18	4	0	9
Mediation	9	13	19	3	0	10
Grant or loan	19	3	9	13	0	18
Guarantees of payment	15	7	4	18	6	9
Support managing debt/mortgage arrears	18	4	19	3	0	15
Security measures for applicants at risk of abuse	14	8	18	4	0	8
Advocacy	7	15	20	2	1	7
Other forms of tenancy support	16	6	19	3	0	13
Accommodation	17	5	19	3	1	14
Programmes to increase availability of affordable accommodation	15	7	12	10	2	10
Social housing lettings schemes	14	8	14	8	3	9
Information and advice	22	0	17	5	0	14

Homelessness options	Provided by local authorities		Provided by others		No provision	Increase in provision since 2014 Act
	Yes	No	Yes	No		
Outreach	10	12	19	3	0	8
Mediation	9	13	19	3	1	5
Grant or loan	20	2	6	16	2	9
Guarantees of payment	14	8	4	18	8	7
Support managing debt/mortgage arrears	14	8	15	7	2	11
Security measures for applicants at risk of abuse	11	11	16	6	2	6
Advocacy	6	16	19	3	2	5
Other forms of tenancy support	13	9	17	5	0	7
Accommodation	14	8	18	4	1	11
Programmes to increase availability of affordable accommodation	15	7	10	12	2	7
Social housing lettings schemes	11	11	13	9	3	6
Information and advice	21	1	12	10	1	10

Source: Post-implementation evaluation of the homelessness legislation (Part 2 of the Housing Act (Wales) 2014) Interim Report, 8 August 2017, Welsh Government. These figures are derived from the local authority and 'others' responses.

Appendix 7: Main reason for being threatened with homelessness in all Welsh local authorities in 2015-16 and 2016-17 and the change in performance

The main reasons people are threatened with homelessness in Wales

Reasons threatened with homelessness	2015-16	2016-17	% change
Loss of rented or tied accommodation	2,481	3,345	34.8%
Parent no longer willing or able to accommodate	1,011	1,317	30.3%
Breakdown of relationship with partner	960	1,137	18.4%
Rent arrears	681	924	35.7%
Other relatives or friends no longer willing or able to accommodate	657	870	32.4%
Current property unsuitable	321	348	8.4%
Other (including homeless in emergency, returned from abroad, sleeping rough or in hostel)	213	336	57.5%
Current property unaffordable	213	249	16.9%
In institution or care (eg hospital, residential home, army etc.)	246	234	-4.9%
Mortgage arrears (repossession or other loss of home)	138	192	39.1%
Prison leaver	99	159	60.6%
Violence and harassment	108	93	-13.9%
TOTAL	7,128	9,210	29.2%

Source: HOUS0430, households found to be threatened with homelessness during the year. Main reason for being threatened with homelessness by type of household (Section 66), annual return to StatsWales.

Appendix 8: Households accommodated temporarily in all Welsh local authorities by accommodation type and quarter in 2015-16 and 2016-17

The range of temporary accommodation provided to homeless people by local authorities in the last two years

Temporary accommodation used by local authorities	April – June 2015	July – September 2015	October – December 2015	January – March 2016	April – June 2016	July – September 2016	October – December 2016	January – March 2017	% Change over period
Private sector accommodation	729	738	726	801	786	807	837	786	7.8%
Public sector accommodation	435	417	396	411	393	393	453	432	-0.7%
Hostels and women's refuges	426	459	432	498	534	501	474	549	28.9%
Bed and breakfast	168	156	132	108	135	138	153	189	12.5%
Homeless at home	81	111	90	60	72	81	36	54	-33.3%
Other	33	0	3	0	9	3	0	3	-90.9%
Total accommodated end of quarter	1,872	1,881	1,779	1,875	1,926	1,923	1,953	2,013	7.5%

Source: HOUS0420, households accommodated temporarily by accommodation type and household type, quarterly data returns to StatsWales.

Appendix 9: Examples of strategic approaches to preventing and managing demand

Good practice examples in how organisations are addressing and managing demand

South Northamptonshire Council

South Northamptonshire Council Prevention and Demand Strategy for adult and social care services includes an analysis of why projects fail and a strong focus on self-directed support. An Early Help and Prevention Commissioning Strategy is now in place to provide the platform for re-commissioning services. This is informed by an Early Help Needs Analysis.

Scottish Fire and Rescue Service

The Scottish Fire and Rescue Service recognises that by effectively collaborating with its partners on shared priorities it will reduce the risk to communities and, in turn, reduce the demand on other key public services such as NHS Scotland, Police Scotland and social services. Their local fire and rescue plans set out how demand reduction should, through time, contribute to the ability of partners to reduce their own spend allowing them to focus their resources on other priorities.

The Edinburgh Partnership

In 2014, consultation was undertaken across the Edinburgh Partnership to help identify perceived 'wicked' or intractable issues, which need increased joint effort to support a successful shift to prevention. An important finding is that interventions are often at the individual level, and whilst there may be enough resources to intervene the public service response is often badly co-ordinated, too slow, and interventions are based on intuition and technocratic judgement rather than solid evaluation and factual understanding of what works. The Edinburgh Partnership's Prevention Strategic Plan 2015-18 sets out its response to the consultation findings. Efforts has been prioritised into nine key Prevention Exemplars and represents a more realistic, affordable and achievable plan. Actions include a much stronger approach to whole household and family support. Building community resilience and community capacity takes a high priority and includes mapping organisation's capabilities including who does what and strengthening networks in neighbourhoods.

Managing demand in National Park Authorities

National Park Authorities have a track record of planning aspects of their activity over the longer-term. Examples include Pembrokeshire Coast National Park Authority's Management Plan 2015-19, which sets out a vision for the area in 2050, and this long term plan guides the authority's approach to ecosystems within the Park. The UK National Parks and Wellbeing Forum is a network of practitioners, managers, planners and researchers involved with promoting the long-term value of the environment and nature conservation for wellbeing. One of its tasks is to understand how best to encourage sustainable tourism and prevent the more damaging aspects of visiting the parks.

Humberside Police

Humberside Police include Strategic Demand Management as one of its core themes for action in its current policing and crime plan. This builds on work developed from its Early Intervention Strategy. Humberside Police recently reviewed the different ways of classifying the types of demand it faces and alongside partners it prioritized the responses to different types of demand. As a result of close collaboration, strategic demand management has been integrated into the Organisational Development aspects of Humberside Fire and Rescue Service's corporate plans.

Calderdale Council

Calderdale Council's demand management framework has three priorities: sharing and integrating services including getting others to share the load; nudging and influencing a change in behaviour; and managing expectations by creating a more balanced relationship between the council and people in Calderdale. Successes include reducing the number of car journeys and traffic congestion by integrating transport solutions such as linking local bus timetables to train times. Demand for car parking is reducing by improving car share, integrating cycle lanes with highways schemes, and working with the private sector to offer more choice and less reliance on council school transport.

Population Needs Assessments

The Social Services and Wellbeing Act (Wales) 2014 requires local authorities and their health board partners to produce an assessment of the care and support of their resident populations. The assessments will aid local authorities and health boards to better understand their population and how it might change over the coming years to help them provide better public services. The Welsh Government requires a number of specific areas of service provision to be included in the assessment, including homelessness.

The North Wales population needs assessment section on homelessness identifies four areas where gaps in service or support currently exist:

- Lack of single person accommodation

- Limited hostel provision

- Shortage of specialist provision

- Gaps in support services

The assessment also identifies that local authorities face challenges through changes to the welfare benefits, the full extent of which are yet to be made. Local authorities and the health board also need to ensure that there is effective integration of third sector support services with statutory services to meet increasing demand. The assessment identifies a risk to the continued progress in addressing homelessness though the loss of Welsh Government transitional funding.

Appendix 10: Key considerations for local authorities in managing demand

Key aspects of managing demand	Characteristics of good demand management	We are good at this	We need to improve this	We do not do this
We know what we must do	We know what our legal obligations are.	⊗	⊗	⊗
	We know what citizens want and how our services should be provided to them.	⊗	⊗	⊗
	We know what services are currently provided by us and our relevant partners.	⊗	⊗	⊗
	We know where services are provided from including those of relevant partners.	⊗	⊗	⊗
Our services are organised to do what we need to do quickly and efficiently	We offer a range of options for citizens to contact us to get the help they need – office, telephone, social media and online.	⊗	⊗	⊗
	Changes to services are piloted and evaluated before they are implemented to ensure they are right for our citizens.	⊗	⊗	⊗
	Our management processes are designed to avoid system failure, for example we do not seek to cancel applications, we keep waiting times to a minimum and we do not delay responding to citizens.	⊗	⊗	⊗
	We have organised services to resolve issues quickly and at the first point of contact.	⊗	⊗	⊗
	We have designed services to avoid unintentionally creating demand and reinforcing dependency.	⊗	⊗	⊗

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Key aspects of managing demand	Characteristics of good demand management	We are good at this	We need to improve this	We do not do this
Our services are organised to do what we need to do quickly and efficiently	We do not gate keep access to services and ensure our services are accessible to all service users.	⊗	⊗	⊗
	We have effective triage approaches to ensure that those in greatest need get help as quickly as possible and alternative responses to those with lower needs.	⊗	⊗	⊗
	We have clear and concise application processes.	⊗	⊗	⊗
	Citizens apply to us once for a service – our application and assessment processes are not duplicated elsewhere within the authority or by our partners.	⊗	⊗	⊗
	We have short end-to-end application processes (from requesting to receiving a service) with few approval stages.	⊗	⊗	⊗
	We respond quickly and effectively to queries and requests when citizens first get in touch.	⊗	⊗	⊗
	We make the right decision quickly when reviewing and approving service requests.	⊗	⊗	⊗
	We can shift resources to manage demand early and downstream to improve our prevention work when we need to.	⊗	⊗	⊗

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Key aspects of managing demand	Characteristics of good demand management	We are good at this	We need to improve this	We do not do this
Citizens know what they are entitled to and where to go for help	We provide citizens with good quality and accessible information through a wide range of appropriate channels.	⊗	⊗	⊗
	We have clearly set out what citizens are entitled to.	⊗	⊗	⊗
	We tell citizens what we can and cannot do.	⊗	⊗	⊗
	We set out all the relevant information citizens need at first point of contact.	⊗	⊗	⊗
	We provide citizens with all the information and support they need to find their own solution to the problems they have.	⊗	⊗	⊗
	We use plain accessible language in our written materials.	⊗	⊗	⊗
	We have tested that our written information is well understood by users, including those that may be anxious or uncertain about their future.	⊗	⊗	⊗
	We are clear about the service users' role in application and assessment processes and we have told them how they can help the process go more smoothly and quickly.	⊗	⊗	⊗
	Our written material is produced collaboratively with subject experts and includes the involvement of people who use the service(s).	⊗	⊗	⊗

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Key aspects of managing demand	Characteristics of good demand management	We are good at this	We need to improve this	We do not do this
Citizens know what they are entitled to and where to go for help	Appeals and complaints processes are based on fairness and equity for all involved and are well set out and accessible and available to all.	⊗	⊗	⊗
	We test how we engage with and provide services with citizens and use feedback to improve how we inform, engage and involve service users.	⊗	⊗	⊗
	Citizens do not need to chase us up to get a response.	⊗	⊗	⊗
We work well and collaborate with others	We have agreed with partners what our expectations of them are and what they are required to do.	⊗	⊗	⊗
	Our partners are clear on their role.	⊗	⊗	⊗
	We have agreed data and information sharing protocols with partners.	⊗	⊗	⊗
	Data and information sharing protocols are working effectively.	⊗	⊗	⊗
	We integrate our digital services with partners to improve accessibility and increase usage.	⊗	⊗	⊗
	We have joint referral, application and assessment procedures and systems with our partners.	⊗	⊗	⊗
	We co-locate services with partners when and where needed.	⊗	⊗	⊗

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Key aspects of managing demand	Characteristics of good demand management	We are good at this	We need to improve this	We do not do this
We work well and collaborate with others	We know that citizens who need help are getting a service from us and/or our partners.	⊗	⊗	⊗
	We effectively direct service users to other organisations who are better placed to solve their problems.	⊗	⊗	⊗
We know services are making the right impact	We collect and analyse the right data to enable us to identify where we need to invest our resources.	⊗	⊗	⊗
	We collect and analyse the right data to design services that best meet people's needs.	⊗	⊗	⊗
	Our data accuracy is good.	⊗	⊗	⊗
	Our data covers the work of both the authority and our partners.	⊗	⊗	⊗
	We collect and use information in real time.	⊗	⊗	⊗
	We are able to demonstrate equal access to services for all citizens.	⊗	⊗	⊗
	We benchmark our performance with other organisations to judge our performance and impact.	⊗	⊗	⊗
	We know what we need to change to improve our service.	⊗	⊗	⊗

Key aspects of managing demand	Characteristics of good demand management	We are good at this	We need to improve this	We do not do this
We know what we need to change and have agreed joint priorities to achieve improvement	We have involved and agreed our priorities with our partners.	⊗	⊗	⊗
	We have involved service users in agreeing what and where we need to improve.	⊗	⊗	⊗
	Our planned solutions take a long-term view.	⊗	⊗	⊗
	We identify sustainable solutions.	⊗	⊗	⊗
	We are focussing on improving how we prevent demand.	⊗	⊗	⊗

How Local Government manages demand – Homelessness

Agenda Item 2.3

Grwp yr Economi, Sgiliau a Chyfoeth Naturiol
Economy, Skills and Natural Resources Group

Dirprwy Ysgrifennydd Parhaol • Deputy Permanent Secretary

**Llywodraeth Cymru
Welsh Government**

Mr Huw Vaughan Thomas
Auditor General for Wales
Wales Audit Office
24 Cathedral Road
Cardiff
CF11 9LJ

14 December 2017

Dear Huw,

Response to the Report of the Wales Audit Office on the National Procurement Service

We welcome the findings of the report and I am pleased to offer the following response to the five recommendations contained within it at Annex A. I hope that this is helpful.

Yours sincerely

James Price

Annex A

Recommendation 1

We recommend that the National Procurement Service:

- **identify in full the reasons why its members are choosing to use local arrangements or other public buying organisations or consortia to purchase common and repetitive goods and services provided through NPS frameworks;**

- **develop an action plan for working with public bodies to articulate the benefits of using NPS to buy common and repetitive goods and services and to encourage them to use it;**

- **examine whether frameworks and contracts can give more commitment to volumes and measure the appetite among members to develop joint specifications;**

- **explore the possibilities of more regional frameworks to increase opportunities for small and medium-sized enterprises; and**

- **survey its members and non-members on an annual basis to obtain views on the service it provides.**

Accepted

The work is in hand. During the spring of 2017 the NPS offered its customers the opportunity to comment on the effectiveness of frameworks. The 17 responses received to date, supplemented by the on going dialogue facilitated by the stakeholder management team are providing key insights and observations.

The benefits of using NPS to buy common and repetitive goods and services and to encourage them to use it has been subject to a work at NPS board level. In addition, a new NPS five year procurement pipeline that has embraced this early work is now being consulted upon.

Frameworks are now being routinely examined to further embrace commitment with extensive support being provided to mini committed mini competition activity.

While NPS agreements are developed and structured based upon extensive customer and market engagement lessons learnt continue to be embraced and the NPS is now exploring regionalised approaches with its members. A recent pilot where the NPS supported seven South West Local Authorities in delivering their engineering consultancy requirements was positively received

While as noted a member's surveys was undertaken specifically in relation to framework usage a wider annual survey to measure views on the services the NPS provides will be implemented.

Timescale and Lead

Jonathan Hopkins, Deputy Director Value Wales
30 September 2018

Recommendation 2

We recommend that in consultation with its members, NPS review the opt-out process and make changes to ensure that it is clearly understood, meaningful and applied consistently.

Accepted

In hand. The opt out process has been discussed by the NPS Board and Delivery Group. Whilst it is agreed the existing approach does not work, the NPS Board have been considering what could replace this. The Cabinet Secretary for Finance published a Written Statement of 21 September announcing work to re-focus NPS and Value Wales. This will take the form of a Review that will include a work package to agree a new process following consultation with members.

Timescale and Lead

Jonathan Hopkins, Deputy Director, Value Wales
31 March 2018

Recommendation 3

We recommend that the Welsh Government, the NPS and member organisations agree a sustainable funding mechanism that will place NPS on a sound financial footing.

Accepted

The Cabinet Secretary for Finance published a Written Statement of 21 September announcing work to re-focus NPS and Value Wales. This will take the form of a Review that will include a work package to explore organisational agreement to a sustainable funding mechanism

Timescale and Lead

Marion Stapleton, Deputy Di<del>rector, </del>~~Pack Page 138~~ing Strategy Team
30 September 2018

Recommendation 4

We recommend that in future annual reports, the NPS include in the key achievements section a summary of actual spend through its frameworks.

Accepted

This work in hand and this information will be reported in the forthcoming NPS report for 2016/17

Timescale and Lead

Jonathan Hopkins, Deputy Director, Value Wales
31 January 2018

Recommendation 5

We recommend that NPS make members more aware of the provisions it is making through its various reporting channels to support opportunities for small to medium enterprises

Accepted

This work is in hand. The NPS has commenced the production of a series of case study reports that will help raise awareness of this work

Timescale and Lead

Jonathan Hopkins, Deputy Director, Value Wales
On going

The timescales indicated for addressing each recommendation are best informed forecast at this stage, pending the impact of the review of NPS and Value Wales, announced by the Cabinet Secretary for Finance and Local Government on 21 September.

Agenda Item 2.4

Cyfarwyddwr Cyffredinol Iechyd a Gwasanaethau Cymdeithasol/
Prif Weithredwr GIG Cymru
Grŵp Iechyd a Gwasanaethau Cymdeithasol

Director General Health and Social Services/
NHS Wales Chief Executive
Health and Social Services Group

Llywodraeth Cymru
Welsh Government

Nick Ramsay AM
Chair
Public Accounts Committee

Our Ref: AG/AWL/SB

22nd December 2017

Dear Mr Ramsay

NHS Finance (Wales) Act 2014

Further to your letter of 24th November 2017 please see below a response to your request for further clarification on the issues highlighted in the Zero Based Review undertaken within Hywel Dda University Health Board (UHB).

Under the four key areas assessed as part of the review, the key findings were as follows:

- Demographics

    Hywel Dda UHB's relatively older population, higher than the Welsh average, may affect utilisation levels and the costs of providing healthcare, and thus could be contributing to additional costs in the acute sector. Also, while deprivation has the potential for an impact on the costs, as Hywel Dda UHB is the median Health Board in terms of deprivation in Wales, no additional cost impact was identified for the UHB.

- Remoteness

    The analysis of costs did not indicate a link between remoteness and additional staff costs within Hywel Dda UHB.

- Service configuration (scale)

    As Hywel Dda UHB has four small main acute hospitals there was evidence to indicate that diseconomies of scale could contribute to additional costs in the acute sector.

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- Efficiency

  Hywel Dda UHB has, in comparison with the Welsh average, opportunity in both activity and unit cost to improve efficiency and reduce costs.

The report findings have been shared with Hywel Dda University Health Board (UHB), with a presentation, and question and answer session, given by Deloitte to Board members on 14th December 2017.

We are currently considering our response to the reviews findings and will be advising the Cabinet Secretary for Health and Social Services in due course. Actions and agreements will then be taken forward, by officials, through the monthly Targeted Intervention meetings with Hywel Dda UHB, and linked to the development and submission of their future year's plans.

It is important to note that the review was only undertaken in Hywel Dda UHB, not in any other Health Board. Accordingly the potential for "excess costs" of healthcare configurations in other Health Boards have not been assessed. However the review does provide evidence that can inform other work, specifically the demographic analysis of both age sex profiles in different localities and also population changes over time, will inform the review of the resource allocation formula.

Yours sincerely

Dr Andrew Goodall

Agenda Item 2.5

Cyfarwyddwr Cyffredinol Iechyd a Gwasanaethau Cymdeithasol/
Prif Weithredwr GIG Cymru
Grŵp Iechyd a Gwasanaethau Cymdeithasol

Director General Health and Social Services/
NHS Wales Chief Executive
Health and Social Services Group

Llywodraeth Cymru
Welsh Government

Nick Ramsay AM
Chair
Public Accounts Committee

03 January 2018

Dear Mr Ramsay

Hospital Catering and Patient Nutrition

With reference to the Public Accounts Committee meeting on Monday 4th December 2017 regarding Hospital Catering and Patient Nutrition, the Clerk of the Committee requested a response to the following agreed action:

- send further information regarding the timelines for the rollout of the new national system for social care (WCCIS) and the All Wales catering system.

Wales Community Care Information System (WCCIS)

There are currently nine Local Authorities live on the system along with Powys Teaching Health Board. An additional three Local Authorities are due to adopt the system in early 2018. Implementation of the WCCIS system within Health Boards will be the main focus of the programme over the next two financial years. Five Health Boards are actively progressing deployment orders for the system which, once signed, will confirm their implementation timescales.

I can now confirm that the Gateway Review gave a Delivery Confidence Assessment of Amber and planning is underway to ensure the key actions recommended in the report are implemented in a timely manner.

All Wales catering system

It has been agreed that NHS Wales Shared Services Partnership (NWSSP) and NHS Wales Informatics Service (NWIS) will work in partnership to procure and implement a Wales wide National Nutrition and Catering IT Solution (NNCIS) in line with the following formal timeline. Beyond the preparation and professional sign off process:

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- January 2018 - will initiate the detailed formal specification of the system to be used within the procurement process.
- September 2018 - OJEU procurement process will commence, with award of the framework taking place in June 2019.
- June 2019 – the new NNCIS will be developed, tested and trialled within one Health Board
- October 2019 – framework will be made available for NHS Wales organisations to call-off from. Implementation within a Board or Trust will need to be aligned with the organisation's own broader catering service improvement plans.

I hope this letter provides you with the information required.

Yours sincerely

Dr Andrew Goodall

Agenda Item 3

Y Grŵp Addysg a Gwasanaethau Cyhoeddus
Education and Public Services Group

Llywodraeth Cymru
Welsh Government

Nick Ramsay AM
Chair, Public Accounts Committee
National Assembly for Wales
Cardiff Bay
CARDIFF   CF99 1NA

Date: 6 December 2017

Dear Mr Ramsay

COMMUNITY SAFETY IN WALES

Further to my letter of 28 July, I am now able to confirm that the final report of the *Working Together for Safer Communities* review is scheduled to be published on the afternoon of Tuesday 12 December.

Its publication will coincide with an Oral Statement to the National Assembly by the Cabinet Secretary for Local Government and Public Services setting out the way forward.

The Cabinet Secretary has offered for you and fellow members of the Public Accounts Committee to receive an informal technical briefing from officials, following the report's publication, which could be arranged at your convenience for sometime early in the New Year.

Please do not hesitate to contact me to make the necessary arrangements for this briefing if you feel this would be beneficial to the Committee.

Yours sincerely

REG KILPATRICK
Cyfarwyddwr Llywodraeth Leol /
Director for Local Government

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Llywodraeth Cymru
Welsh Government

Working Together for Safer Communities

A Welsh Government review of community safety partnership working in Wales

December 2017

Crime (including Cyber)

Road Safety

Adult Justice

Community Fire Safety

Youth Justice

Community Cohesion

ASB & Disorder

Resilience (including Cyber)

Terrorism & Extremism

Night Time Economy

Serious & Organised Crime

Substance Misuse

VAWDASV & DHRs

A globally responsible Wales

A prosperous Wales

A Wales of vibrant culture and thriving Welsh Language

A resilient Wales

A Wales of cohesive communities

A healthier Wales

A more equal Wales

CONTENTS

Appendices:

Our Vision for Community Safety in Wales

Our vision is a Wales in which:

» Every community is strong, safe and confident in a manner that provides equality of opportunity and social justice, resilience and sustainability for all;

» The shared responsibility of government, public and third sector agencies is to work together with the communities they serve and the private sector to address activity or behaviour that is unlawful, anti-social, harmful to individuals and society and to the environment;

» Sharing knowledge and ensuring early intervention with prompt, positive action tackles local issues and addresses vulnerabilities.

This vision will be achieved through collaborative and integrated multi-agency activity that is:

☑ Evidence-based and intelligence-led;

☑ Supported by appropriate skills & knowledge;

☑ Sustainably resourced and locally appropriate;

☑ Engaging and involving citizens;

☑ Preventative and intervening as early as possible;

☑ Focused on long-term improvements and benefits.

Executive Summary

Next year will mark the 20th anniversary of the Crime & Disorder Act 1998 that enshrined the concept of statutory partnership working to address community safety issues and created a legal duty for local authorities, police forces and, ultimately, health, fire and probation services to work together to prevent and reduce 'crime and disorder' in their respective communities.

Wales Audit Office's *Community Safety in Wales* Report last year suggested that community safety partnerships (CSPs) in Wales, were not as effective as they could or should be and highlighted a number of areas for significant improvement.

The Auditor General put forward seven recommendations that included the establishment of a national community safety strategy and governing body, supported by regional boards and comprehensive action plans, a review of funding arrangements and a new suite of key performance indicators. It was suggested that Police & Crime Commissioners (PCCs) and local authorities should revise monitoring and review mechanisms, based on risk, and that Wales' Public Services Boards (PSBs) should lead on citizen engagement around community safety issues.

In response, the Welsh Government advised it would undertake a wider review of Community Safety and reform to "move the community safety agenda forward" and respond to the Auditor General's recommendations.

Although the fundamental 'partnership' principle of the 1998 Act still holds true, the present social, political, economic and environmental conditions in Wales are now significantly different to the context in which 'Crime & Disorder Reduction Partnerships' (CDRPs) were established. Present day challenges for community safety partnership working in Wales include: the growing influence of devolution; a wider range of new 'crime types' such as modern slavery and hate crime; the escalating threat from international terrorism; and the influence of new psychoactive substances and cyber-enabled offending, to name a few. Public service structures in Wales have substantially altered since the late 1990s and there have been numerous alterations to the primary legislation itself.

Announcing the nature and scope of the review in March this year, Cabinet Secretary for Communities and Children Carl Sargeant AM stated: "I want the review

to be ambitious in its thinking and to develop a clear vision for community safety that is not only robust, relevant and responsive, but will be sustainable in the long term. We now have an unprecedented opportunity provided by the current implementation of the Well-being of Future Generations (Wales) Act 2015 to establish a sustainable approach to partnership working in Wales that will deliver safer communities for future generations."

An Oversight Group was established by the Cabinet Secretary to ensure the delivery of a high quality evidence-based review, chaired by Welsh Government and consisting of representatives from the Home Office, Ministry of Justice, Her Majesty's Prison & Probation Service (HMPPS), the Welsh Police & Crime Commissioners (PCCs), National Police Chiefs Council, Chief Fire Officers Association, Youth Justice Board (YJB) Cymru, Welsh Local Government Association (WLGA), Society of Local Authority Chief Executives (SOLACE), Community Justice Cymru (CJC) and Welsh Local Health Boards (LHBs).

The Oversight Group agreed to develop the review through six key phases, some of which ran concurrently, as follows:
• Community Safety Strategic Assessment & Planning Refresh
• Desktop review and analysis of existing evidence and data
• Consultation and submission of new evidence (including case studies)
• Formulation of recommendations based on findings
• Testing – or reality checking – draft recommendations
• Announcement of final recommendations

The Welsh Government review team utilised four lines of inquiry, developed in collaboration with the office of the Future Generation Commissioner for Wales to conform to the Sustainable Development Principle (known as the 'Five Ways of Working') within the Well-being of Future Generations (Wales) Act 2015, to try to identify the barriers and enablers affecting community safety partnership working in Wales:

1.   What needs to change to enable public and third sector services in Wales to maximise/establish and sustain intelligence-led business processes

that identify the root causes of community safety issues in order to prevent them from occurring?

2.   What needs to change to enable public and third sector services in Wales to establish and sustain effective and responsive delivery structures that work collaboratively to find long-term solutions to community safety issues?

3.   What needs to change to enable public and third sector services in Wales to better integrate community safety strategic assessments and plans into other statutory assessment and planning processes (e.g. Programme for Government, PSB single planning processes, Police & Crime Plans)?

4.   What needs to change to enable public and third sector services in Wales to provide visible and constructive accountability around community safety issues that engages and involves a diversity of the population in the decisions that affect them?

These lines of inquiry were employed by the review team to conduct a series of stakeholder consultation events and activities involving more than 500 individuals and agencies between February and October 2017, including a selection of partnership activity case studies. They were also used to conduct the desktop review of relevant documentation.

The review found evidence of significant weaknesses in intelligence-led and evidence-based community safety partnership activity – including strategic assessments, planning and multi-agency service or solution commissioning, particularly in relation to preventative action or early intervention. Community safety partners described a sense of 'assessment fatigue', with statutorily required strategic assessments (e.g. community safety, health, social care & well-being and well-being) being commissioned in a cyclical 'stop-start' fashion rather than being mainstreamed into a day-to-day 'business intelligence' approach.

Identified issues appear to be exacerbated by: operating in silos; significantly reduced analytical resources; over-reliance on police analysts and data; incompatible data sets and systems; a continued reluctance to share both personal and non-personal data between partner agencies; limited data development to better

understand and assess progress toward improving outcomes; and an inconsistent approach to the use of minimum common data sets that enable benchmarking and aggregation of relevant data to regional and national levels. There is also evidence of a limited and very mixed approach to service user engagement and data capture.

On the positive side, the review also found evidence of a growing recognition of the value of effective 'business intelligence' together with examples of effective data sharing utilising the Wales Accord for the Sharing of Personal Information (WASPI) or other 'gateway' protocols and processes and a number of initiatives to develop more systematic approaches to data-sharing and analysis including the development of software systems, greater co-location and networking involving analysts.

The review found evidence of negative impacts on community safety resources and delivery structures attributed to public sector austerity, although there has been an element of mitigation with increased Welsh Government funding available for specific workstreams such as Violence Against Women, Domestic Abuse & Sexual Violence (VAWDASV), community fire safety and substance misuse – together with some degree of protection of community safety partnership funding available from Welsh PCCs.

There is evidence of structural and resourcing conflicts and confusion posed by an array of both regional and local operational and strategic partnership 'footprints' at play within the community safety agenda, and by the growing divergence between Welsh and UK Government policy and practice that leaves non-devolved community safety partners caught in the middle and less than clear about implementing non-devolved policy within a devolved landscape and context. We also found a confusion of community safety funding streams from multiple governmental sources, with many of grants tied to quite prescriptive and inflexible terms and conditions and requiring significant levels of administrative effort, monitoring and reporting for what are usually comparatively small and short-term sums of money.

The review found a significant erosion of 'appropriate skills and knowledge' to support more effective community safety partnership working, particularly at an operational problem-solving level, together with a dilution of the local authority community safety 'lead officer' role which historically provided the drive, focus and

expertise around community safety agendas within the complex and confusing public sector 'partnerships' environment.

There is limited evidence of any significant shift in partnership investment toward 'invest-to-save' principles, supporting more prevention and early intervention services, with the majority of community safety resources appearing to be directed toward crisis management and 'treatment'. There is also limited evidence of public services, individually or in partnership, adopting more 'place-based' budgeting approaches that re-shape public service delivery to meet evidenced need. Respondents report mixed levels of engagement from health partners and inequitable relationships with third sector partners and service providers, particularly related to service planning and commissioning.

The review found that statutory partners face significant challenges in attempting to effectively integrate community safety partnership assessment, prioritisation and planning into the broader partnership landscape at national, regional and local levels, reflecting the increasingly 'confused and complex' community safety partnership landscape referred to by the Auditor General in his 2016 report. Evidence suggests that partners are having to balance competing and sometimes conflicting demands from different UK and Welsh Government departments, navigating a plethora of different pieces of guidance concerning the delivery of various community safety themes, some of which is deemed as 'over-prescriptive' by respondents. The mix of devolved and non-devolved responsibilities and blurring of the boundaries between them is seen as problematic by many and positive by some. Evidence suggests there is a growing body of support to harmonise via devolution of policing and justice to the Welsh Government.

The review also found a degree of confusion around the role of PSBs in meeting the statutory requirements of the Crime & Disorder Act while balancing the need to focus on well-being assessment and planning as required by the Well-being of Future Generations (Wales) Act. This confusion is exacerbated by the mix of local and regional partnership structures and governance arrangements that are interdependent with local community safety partnership working, such as regional safeguarding boards. Some respondents suggested audit and inspection regimes for individual community safety partners do not support more cross-cutting and holistic

working around, for example, reducing reoffending. There were also concerns that the drive towards 'single integrated partnerships' had diluted the community safety focus and expertise needed for effective partnership working.

Review respondents identified a number of challenges around providing visible and constructive accountability around community safety partnership working including a broadly held concern that public sector bodies focus too much on 'consultation' rather than active involvement and participation by citizens. Concerns were raised about the availability of expertise and evidence-based methodologies to enable more effective engagement. Third sector partners stated that early involvement in co-producing and resourcing community engagement activity would be more likely to prove successful in reaching out to a broader diversity of the population rather than hearing from the 'usual suspects'.

Evidence indicates there is a lack of public awareness and understanding around community safety partnership working, let alone the role and functions of newer public services boards that may have incorporated community safety boards, but it also suggests citizens themselves are more concerned with the effectiveness and appropriateness of service delivery and there is more value to be gained for community safety partners in service user – or 'customer' – engagement leading to improved service design and delivery.

The review found that the current mixed landscape of PCCs, Police & Crime Panels (PCPs), local authority overview and scrutiny and community safety portfolio holders within council cabinets or executives does not provide sufficiently clear or robust democratic accountability and challenge around community safety partnership working and effectiveness and that greater clarity would be welcomed. The review also found evidence that local councillors have the potential to play a greater role in community safety partnership working and citizen engagement if better informed and more closely involved by the statutory partners.

In order to address these identified challenges, the Welsh Government proposes to establish a long-term programme of work – in partnership with our devolved and non-devolved partners and stakeholders – to take forward and implement a new and ambitious vision for working together for safer communities in Wales.

The Safer Communities programme will:

- Work with the newly established Justice Commission for Wales in considering how we can do things differently in Wales and identify options to develop a distinct Welsh justice system, which improves people's access to justice, reduces crime and promotes rehabilitation and is truly representative of Welsh needs.

- Establish a dialogue with the Home Office to consider the appropriateness of the Crime & Disorder Act 1998 in a way that better reflects Welsh devolution.

- Develop a different relationship and strategic approach with non-devolved community safety partners that establishes a more effective leadership role for Welsh Government in areas of devolved responsibility related to community safety partnership working.

- Establish a community safety 'partnership' policy & practice leadership function within the Welsh Government, working in close partnership with the Home Office, Ministry of Justice and other relevant 'devolved' leads for UK Government.

- Develop new Wales-specific guidance that builds on the sustainable development principle and the Hallmarks of Effective Partnership and outlines how community safety partners and partnerships can ensure they are:
    - Evidence-based and intelligence-led;
    - Supported by appropriate skills & knowledge;
    - Sustainably resourced and locally appropriate;
    - Engaging and involving citizens;
    - Preventative and intervening as early as possible;
    - Focused on long-term improvements and benefits.

- Consider how to establish a new and inclusive national community safety network for Wales that will support future Welsh community safety policy and practice development and to help to build the 'appropriate skills and knowledge' required to implement the new vision;

- Consider how to establish an online community safety library and resources database for Wales;

- Explore opportunities for piloting joint thematic inspection arrangements for community safety partnership working around the 'reducing reoffending' theme with relevant devolved and non devolved audit and inspection regimes;

- Consider how to improve community safety funding programmes to secure longer term and more flexible 'outcomes focused' funding that supports more holistic, collaborative partnership service planning & commissioning arrangements, including co-production models and participatory budgeting elements.

In addition, it is proposed that a cross-governmental review of regional 'footprints' is undertaken to ensure they are fit-for-purpose and that an assessment of the WASPI arrangements is completed to ensure it remains effective and appropriately applied at a local level.

Background

Next year will mark the 20th anniversary of the Crime & Disorder Act 1998 that enshrined the concept of statutory partnership working to address community safety issues and created a legal duty for local authorities, police forces and, ultimately, health, fire and probation services to work together to prevent and reduce 'crime and disorder' in their respective communities.

There have been a number of significant changes since its introduction, arguably the most substantial of which was the Police Reform & Social Responsibility Act 2011 that introduced directly elected Police & Crime Commissioners to the community safety landscape and 'de-regulated' some of the more prescriptive elements of the original Act.

The 1998 Act remains in force and, with it, the legal responsibility for chief executives of local authorities and health boards, chief constables and chief fire officers and chief officers of probation services to work in partnership to prevent and reduce crime and disorder, anti social behaviour, behaviour adversely affecting the environment, substance misuse and re-offending.

However Wales Audit Office's *Community Safety in Wales* Report, October 2016 (**Appendix i**) appeared to suggest that Welsh community safety partnerships were not as effective as they could or should be and highlighted a number of areas for significant improvement. The Auditor General stated that: "…complex responsibilities make it difficult for public bodies to co-ordinate a strategic approach to community safety, which weakens collective leadership and accountability and undermines the potential to help people stay safe."

Paraphrasing the ten main conclusions of the Auditor General's report, it suggested that the statutory requirements of the 1998 Act were no longer being met as effectively as intended by the legislation. Furthermore, the report points to the other landmark change introduced by the UK Government in 1999 – devolution and the complexities of an agenda that straddles responsibilities for governments in both Westminster and Cardiff – as one of the main causes for the reported deterioration in community safety partnership working in Wales.

Community Safety in Wales talks of the growing divergence of both policy and practice between the UK and Welsh Governments, with community safety 'partners' effectively caught in the middle. It suggests there are issues around local and regional footprints that exacerbate the complexity of partnership arrangements – particularly in terms of governance and accountability. The report acknowledges the significant impact of austerity measures on partnership resources and suggests there have been conflicts between UK and Welsh Government funding arrangements. It also questioned the effectiveness of present partnership arrangements in relation to the use of data and information and in terms of performance management and evidencing successful outcomes for communities.

The report concluded that recorded crime appeared to be increasing and that communities are feeling less safe with a degree of citizen dissatisfaction around the effectiveness and accessibility of CSPs in Wales.

The Auditor General put forward seven recommendations that included the establishment of a national community safety strategy and governing body, supported by regional boards and comprehensive action plans, a review of funding arrangements and a new suite of key performance indicators. It was suggested that PCCs and local authorities should revise monitoring and review mechanisms, based on risk, and that Wales' PSBs should lead on citizen engagement around community safety issues.

In response, the Welsh Government advised it would respond to address the Auditor General's recommendations as part of a wider review and reform to "move the community safety agenda forward".

In a letter to Nick Ramsay AM, chair of the National Assembly for Wales Public Accounts Committee in November 2016 (Appendix ii) the Welsh Government stated: "While there is significant evidence that the Welsh Government and other partner organisations are fully engaged in a range of activities across the community safety agenda, the report makes a much more fundamental observation which goes beyond a discussion of leadership or strategy. It highlights how the policy area has developed since devolution; and continues to develop at pace and how the different layers of government – and governance – have developed; and the numerous organisational changes which have taken place. We agree that there is a need to

address these issues and our response to the report provides the opportunity to review and refresh the arrangements for community safety in Wales, taking into account not just the context of today, but possible developments in the future."

Announcing the nature and scope of the review in March this year (**Appendix iii**), Cabinet Secretary for Communities and Children Carl Sargeant AM stated: "I want the review to be ambitious in its thinking and to develop a clear vision for community safety that is not only robust, relevant and responsive, but will be sustainable in the long term. We now have an unprecedented opportunity provided by the current implementation of the Well-being of Future Generations (Wales) Act 2015 to establish a sustainable approach to partnership working in Wales that will deliver safer communities for future generations."

Context

In order to better understand the Auditor General's critical assessment of the present circumstances for community safety in Wales and the remedial actions his report proposed for the range of stakeholders involved, it is worth first reflecting on the original rationale behind the establishment of statutory 'community safety partnerships' and the various and ever-changing requirements placed upon them over the two decades since their inception.

The Crime & Disorder Act 1998 represented a fundamental shift in the UK Government's policy approach to tackling 'crime and disorder' – formally introducing the much broader concept of 'community safety' and extending the statutory responsibility for working to address rising crime levels and declining perceptions of public safety to partners other than the police.

The legislation was a new and very different policy response to almost three decades of rapidly rising crime levels and social unrest many historians and criminologists attribute to a steady decline in heavy industries, high levels of unemployment and a growing poverty gap between wealthier and poorer communities contributing to the erosion of community cohesion. These underlying social conditions were fuelled by the influx of cheaper and more readily available Class A drugs, particularly highly addictive opiates, and the growth of mass produced electronic goods that were comparatively easy to steal and sell on the black market.

The Brixton riots in 1981 prompted the Scarman Report, which concluded that many police forces particularly in urban areas had become remote from the communities they policed and recommended that policing should adopt more proactive measures to ensure closer and more effective relationships with their respective communities. The report highlighted the growing divergence of modern policing from its original 1829 Peelian Principles – policing by consent via the 'citizen in uniform'. Among the changes it prompted to policing was the development of police/community liaison arrangements and the establishment of the 'police community liaison officer' role within all forces.

The early 1980s also saw UK Government beginning to explore the concepts of situational crime prevention, utilising both physical and social responses to crime, including emergent CCTV technologies, and the American concept of 'Problem-Oriented Policing' (POP) coined by University of Wisconsin-Madison Professor Herman Goldstein. In 1984 the Government issued Home Office Circular 8/84 which stopped short of placing a statutory duty on local authorities to help prevent or reduce crime but instructed they should "take some responsibility". The circular stated: "A primary objective of the police has always been the prevention of crime. However, since some of the factors affecting crime lie outside the control or direct influence of the police, crime prevention can not be left to them alone. Every individual citizen and all those agencies whose policies and practices can influence the extent of crime should make their contribution. Preventing crime is a task for the whole community."

In 1986 the UK Government established the 'Safer Cities' programme which became the main channel through which around £30m of government funding for crime prevention projects would be directed, leading to the establishment of third sector led programmes of community crime prevention such as Safer Cardiff and Safer Merthyr Tydfil. In 1988 it set up Crime Concern to stimulate the involvement of private sector organisations, particularly local businesses, in crime prevention. Crime Prevention Panels and Neighbourhood Watch Schemes, based on a model developed in Chicago, flourished in many areas of the UK. However these initiatives failed to significantly impact on levels and perceptions of crime and the Government response was to establish the Home Office Standing Conference on Crime Prevention in 1990, led by James Morgan.

The 1991 Standing Conference report – *Safer Communities: the Local Delivery of Crime Prevention Through the Partnership Approach* – which became known as the 'Morgan Report' coined the term 'community safety' and proposed a more 'holistic approach' to crime and disorder reduction that placed greater emphasis on prevention by focusing on the social, economic and environmental causal factors that result in criminality. It contained 19 recommendations, the fifth of which advocated that local authorities "…should have clear statutory responsibility for the development and stimulation of community safety and crime prevention programmes."

The Morgan Report stated: "Crime prevention inter-relates with many aspects of local government and the diverse elements of the criminal justice system. The term crime prevention is often narrowly interpreted and this reinforces the view that it is solely the responsibility of the police." The report also highlighted that reducing crime alone would not necessarily improve people's quality of life and that 'fear of crime' also had to be tackled by addressing indicators of lawlessness such as low level public disorder, graffiti and criminal damage.

However the core messages of the Morgan Report did not rise to public prominence and political debate until February, 1993, following the murder of two-year-old James Buldger by 10-year-olds Robert Thompson and John Venables. The case bore many of the hallmarks of issues raised by the Morgan Report…including truancy, poor educational attainment, unchecked low level disorder and acquisitive crime escalating to the most serious form of criminality. Public outcry and media reaction to the murder prompted renewed focus on the central 'partnership' message of the Morgan Report, debate about the appropriate management of 'young offenders' and also sparked the now famous soundbite 'tough on crime, tough on the causes of crime'. Five years later the Morgan Report was to form the foundation of the new Crime and Disorder Act 1998.

Academics argue it represented the single most fundamental shift in UK Government policy on policing and criminal justice since the establishment of the modern British police with Sir Robert Peel's Metropolitan Police Act 1829. In establishing the concept of statutory multi-agency partnerships of 'responsible authorities' with a legal duty to prevent and reduce crime and disorder, the new Act echoed the original Peelian ninth principle:

> "To recognise always that the test of police efficiency is the absence of crime and disorder, and not the visible evidence of police action in dealing with them."

The Morgan Report clearly identified that local authorities have as great a role, if not greater, than the police in preventing and reducing crime and disorder through more effective management of the local social, economic and environmental conditions that cause it.

Although the fundamental 'partnership' principle of the 1998 Act still holds true, the present social, political, economic and environmental conditions in Wales are now significantly different to the context in which CDRPs were established. Present day challenges for community safety partnership working in Wales include: the growing influence of devolution; a wider range of new 'crime types' such as modern slavery and hate crime; the escalating threat from international terrorism; and the influence of new psychoactive substances and cyber-enabled offending, to name a few. Public service structures in Wales have substantially altered since the late 1990s and – as the following 'community safety partnership working' timeline shows – there have been numerous alterations to the primary legislation itself.

The Auditor General's 2016 report provided a timely opportunity to pause and reflect on the impact of such changes and assess how best to move forward in ensuring the original tenet of the Morgan Report and the Act it shaped remains relevant for Wales.

Timeline: The Evolution of Community Safety Partnership Working

1829 – Metropolitan Police Act and Peelian Principles for Policing

1970s – UK crime levels virtually double within the decade

1981 – Brixton riots prompt the Scarman Report which called for police to reconnect with communities

1984 – Home Office Circular 8/84 urges local authorities to take 'some responsibility' for crime prevention

1986 – UK Government launches Safer Cities programme of crime prevention led by the community and third sector

1991 – Home Office Standing Conference on Crime Prevention publishes *Safer Communities: the Local Delivery of Crime Prevention Through the Partnership Approach* (the Morgan Report)

1998 – Introduction of the Crime & Disorder Act leads to establishment of CDRPs, Youth Offending Teams (YOTs), Crime & Disorder Reduction Audits and Strategies and tools such as Anti Social Behaviour Orders (ASBOs)

2002 – Police Reform Act establishes requirement to produce substance misuse strategies and prompts the merger of CDRPs and Drug & Alcohol Action Teams (DAATs) in Wales to become CSPs; police and fire authorities become 'responsible authorities' under the 1998 Act; police required to become National Intelligence Model (NIM) compliant

2003 – Anti Social Behaviour Act introduces a wider range of powers for police and partners to tackle ASB and disorder, supplemented by new legislation for licensing and fireworks

2005 – Clean Neighbourhoods & Environment Act extends CSP powers and responsibilities to include 'alley-gating', graffiti, fly-tipping etc.,

2006 – Police & Justice Act updates the core definition of 'crime & disorder', replaces the requirement for 'audits' and 'strategies' with annual strategic assessments (in line with NIM) and three-year rolling action plans, reviewed annually; establishes a duty to disclose non personal or aggregated data & data sharing champions, together with a common minimum data set; introduces the 'hallmarks of effective partnership' and local authority 'overview & scrutiny' of CSPs

2009 – Policing & Crime Act adds 'reducing reoffending' to the list of statutory responsibilities for CSPs and their respective 'responsible authorities', changing the status of probation services from 'co-operating body' to a responsible authority

2011 – Policing & Social Responsibility Act introduces directly elected PCCs to replace police authorities, removal of Government crime reduction targets, de-regulation of 'overly prescriptive' elements of 1998 Act and a requirement for PCCs and CSP responsible authorities to 'have regard' to each others priorities

2012 – Crime and Disorder (Formulation and Implementation of Strategy) (Wales) (Amendment) Regulations 2011 paves the way for Welsh Government statutory guidance *Shared Purpose, Shared Delivery* to establish 'single integrated partnerships' (SIPs) and plans known as Local Service Boards (LSBs) and states: "The Welsh Government considers that a single integrated plan should be used to meet the statutory duties in relation to the development of plans and strategies required under the following legislation: Crime and Disorder Act 1998 (Part 1: S6) – strategies for the reduction of crime and disorder, strategies for combating the

misuse of drugs, alcohol and other substances, and strategies for the reduction of re-offending.

2014 – Welsh Government introduce the Violence against Women, Domestic Abuse and Sexual Violence Act (Wales) (2015) calls for public bodies to improve: arrangements for the prevention of VAWDASV; arrangements for the protection of VAWDASV; support for people affected by VAWDASV.

2015 – Well-being of Future Generations Act establishes well-being goals, the Sustainable Development Principle and replaces LSBs with PSBs with a requirement to undertake well-being assessments and develop plans

2016 – Auditor General in Wales publishes the *Community Safety in Wales* report and Welsh Government agrees to conduct a fundamental review of community safety partnership working

2017 – The Working Together for Safer Communities review is completed.

Aims & Objectives

This review is intended to ensure Welsh Government is better placed – through appropriate collaboration with non-devolved agencies and partners and via the well-being objectives published alongside the Taking Wales Forward Programme for Government – to provide effective leadership to the public service in Wales that supports the local delivery of safer and more confident communities.

The review has therefore made recommendations for:

- Establishing a strategic vision for community safety in Wales which all organisations involved understand, share and build into their national, regional and local planning;
- A sustainable approach to partnership working in Wales developed through the collection and analysis of evidence including UK-wide and international evidence about what works;
- Understanding, defining and clarifying the range of stakeholders and their leadership roles, including that of Welsh Government, Police and Crime Commissioners, Local Authorities and Whitehall Departments;
- Creating stronger, more effective and more accountable leadership from all agencies and organisations;
- Reflecting the new clarity around leadership by streamlining and simplifying governance to enhance accountability while refocusing activity so as to avoid duplication, and confusion;
- Achievement of the well being objectives published alongside the Taking Wales Forward Programme for Government; and
- Ensuring delivery in accordance with the Taking Wales Forward Programme for Government.

It has also taken account of the wider political and policy context including:

- UK and Welsh legislation and whether there is a need for further reform, including opportunities offered by the Wales Act 2017;
- UK policy, for example in prison reform and developments in youth justice and community cohesion and around PCCs etc.;
- The single planning process through PSBs;

- Interdependencies between devolved and non-devolved responsibilities (including PCCs) and the potential for better alignment; and
- Welsh Government's proposals for the reform of local government and in particular the regionalisation of services.

Framework & Methodology

In March this year Cabinet Secretary for Communities and Children Carl Sargeant AM established the Working Together for Safer Communities Review Oversight Group. Its purpose was to ensure the delivery of a high quality evidence-based review following the Wales Audit Office report *Community Safety in Wales*. The task and finish group, chaired by Welsh Government, also consisted of representatives from the Home Office, Ministry of Justice, Her Majesty's Prison & Probation Service (HMPPS), the Welsh Police & Crime Commissioners, National Police Chiefs Council, Chief Fire Officers Association, Youth Justice Board (YJB) Cymru, Welsh Local Government Association (WLGA), Society of Local Authority Chief Executives (SOLACE), Community Justice Cymru (CJC) and Welsh Local Health Boards (LHBs).

Its inaugural meeting was on March 1st when terms of reference (**Appendix iv**) and the review framework (**Appendix v**) and methodology (**Appendix vi**) were agreed. In part, the review sought to address the issues raised in the Auditor General's 2016 report however, the remit of the review and the Oversight Group was wider and would also examine the way public services in Wales work together to help make our communities safer in order to develop an ambitious, shared vision within which organisations work together more effectively.

The review utilised and relied upon the Sustainable Development Principle from the Well-being of Future Generations Act (2015), known as the Five Ways of Working, to examine current public service frameworks (including legislative and budgeting), structures, policies and processes to ensure there is:

- Integration (e.g., mainstreaming, cross-cutting, place-based approaches);
- Focus on prevention (e.g. invest in effective upstream interventions, invest to save);
- Collaboration (e.g. pooled budgets, multi-agency teams);
- Involvement and engagement of citizens;
- Long term thinking (future-proofing).

The Oversight Group agreed to develop the review through six key phases, some of which ran concurrently, as follows:

- Community Safety Strategic Assessment & Planning Refresh
- Desktop review and analysis of existing evidence and data
- Consultation and submission of new evidence (including case studies)
- Formulation of recommendations based on findings
- Testing – or reality checking – draft recommendations
- Announcement of final recommendations

The foundational phase, which commenced in March at the Cabinet Secretary's request, involved the four Welsh PCCs working with their local statutory partners to 'refresh' community safety strategic assessments and plans in local areas within each force, providing information on progress and issues encountered to inform the work of the Oversight Group and review team.

The International Centre for Policing and Security (ICPS) within the University of South Wales (USW) was asked to undertake a desktop review of existing documentary evidence (**Appendix vii**) and to conduct a further baseline assessment of community safety partnership configuration and service provision across Wales. ICPS is an internationally recognised division of USW with a pedigree for conducting national and international research into policing and crime matters, including community safety. It works closely with many agencies involved within the criminal justice system and provides education for future and currently serving police officers.

A process of community safety stakeholder mapping was devised to develop an illustrative info-graphic document (**Appendix viii**) to better understand the complexities of the multi-layered and multi-themed structures and networks involved in community safety partnership working across Wales, identified in the Auditor General's 2016 report.

Lines of Inquiry for the review were developed in collaboration with the office of the Future Generation Commissioner for Wales to conform to the Sustainable Development Principle (known as the 'Five Ways of Working') within the Well-being of Future Generations (Wales) Act 2015:

- Looking to the **long term** so that we do not compromise the ability of future generations to meet their own needs;

- Taking an **integrated** approach so that public bodies look at all the well-being goals in deciding on their well-being objectives;
- **Involving** a diversity of the population in the decisions that affect them;
- Working with others in a **collaborative** way to find shared sustainable solutions;
- Understanding the root causes of issues to **prevent** them from occurring.

They also incorporated the 'Hallmarks of Effective Partnership' developed by the Home Office in collaboration with community safety planning practitioners from around the UK and utilised within the Police & Justice Act 2006 as the basis for the former Assessment of Policing & Community Safety (APACS) and the underpinning baseline for Overview and Scrutiny of CSP working:

- Empowered & Effective Leadership
- Intelligence-led business process
- Effective & Responsive Delivery Structure
- Visible & Constructive Accountability
- Appropriate Skills & Knowledge

These 'Hallmarks' were also used by the Auditor General as the central criteria for judging the effectiveness and efficiency of community safety partnership working in the 2016 report, although Welsh Government did challenge this approach at the time on the basis that the Hallmarks were devised for benchmarking and supporting improvement within individual partnerships rather than a methodology for conducting such a wide-ranging audit.

The Welsh Government review team utilised four lines of inquiry to try to identify the barriers and enablers affecting community safety partnership working in Wales:

1.   What needs to change to enable public and third sector services in Wales to maximise/establish and sustain intelligence-led business processes that identify the root causes of community safety issues in order to prevent them from occurring?

2.   What needs to change to enable public and third sector services in Wales to establish and sustain effective and responsive delivery structures that work collaboratively to find long-term solutions to community safety issues?

3.   What needs to change to enable public and third sector services in Wales to better integrate community safety strategic assessments and plans into other statutory assessment and planning processes (e.g. Programme for Government, PSB single planning processes, Police & Crime Plans)?

4.   What needs to change to enable public and third sector services in Wales to provide visible and constructive accountability around community safety issues that engages and involves a diversity of the population in the decisions that affect them?

These lines of inquiry were employed by the review team to conduct a series of stakeholder consultation events and activities (**Appendix ix**) involving more than 500 individuals and agencies between February and October, including a selection of partnership activity case studies that have informed the findings and recommendations and are referred to in the following chapters. They were also used to conduct the desktop review of relevant documentation.

The review also looked at the experience of Scottish community safety partnership working and the relationships between Scottish Government and its community safety delivery partners.

The penultimate phase of the review involved a series of four regional engagement events hosted by the PCCs for Dyfed Powys, Gwent, North Wales and South Wales to test the draft findings and conclusions within a Framework for Change (**Appendix x**) and to develop detailed proposals for the Cabinet Secretary to announce in December.

Findings & Conclusions

1. Evidence-based Problem-Solving:

CSPs were created from the outset to lead *evidence-based* collaborative and integrated activity to address the causes of crime and disorder – a dual agenda of evidence-led prevention and reduction. Having established the concept of statutory multi-agency partnerships and 'responsible authorities', the 1998 Act immediately directed these new partnerships to undertake local triennial crime and disorder 'audits' (Section 6) before going on to develop plans and programmes of partnership activity.

Although 'audits' were subsequently repealed by the Police & Justice Act 2006 and replaced with the requirement to undertake annual 'strategic assessments' – in line with the impetus around NIM and recognition of the value of adopting NIM principles within intelligence-led partnership problem-solving – the foundational activity for CSP working remains the effective gathering, collation and analysis of relevant information to drive business as effectively and efficiently as possible.

The Auditor General's 2016 report highlighted a number of deficiencies in the use of relevant data by partners and partnerships to identify local priorities and plan necessary interventions and concluded:

> "Some community-safety plans are not underpinned by good-quality information and have not been updated to reflect changing patterns and trends in community safety. Whilst 18 local community-safety partnership co-ordinators stated that the community-safety priorities in their plans are based on good evidence, our review of plans concluded that only nine of the 20 partnerships provided evidence that they regularly update their strategic assessments and 11 did not. Of the nine that did provide evidence, we found six of them to have based their assessment on a wide range of appropriate data and used the information to identify and focus on priorities that reflected local circumstances."

The report revealed an over reliance on police data and police analysts by CSPs. The Auditor General recommended that Welsh Government, PCCs and local

authorities should work together to ensure effective management of performance of community safety by:

- setting appropriate measures at each level to enable members, officers and the public to judge progress in delivering actions for community-safety services;
- ensuring performance information covers the work of all relevant agencies; and
- establishing measures to judge inputs, outputs and impact to be able to understand the effect of investment decisions and support oversight and scrutiny.

The evidence gathered by this review certainly confirms that evidence-based, or intelligence-led business planning is an area of fundamental weakness in community safety partnership planning in Wales and confirms that the approach to strategic assessment, where it is still regularly carried out, remains dominated by the gathering and analysis of police and criminal justice data largely by police analysts, with limited use of wider partnership data available from local authorities, health boards, fire services and third sector community-based service providers and limited involvement of non-police analysts.

However, the challenge to community safety partnership working in Wales now exceeds the 'strategic assessment' requirement with a direction to "understand the root causes of issues to prevent them from occurring" (Well-being of Future Generations Act 2015). Effective strategic assessment to prioritise and plan community safety interventions therefore requires a more holistic and sophisticated approach in order to find shared sustainable solutions that look to the long term so that we do not compromise the ability of future generations to meet their own needs.

A sustainable development approach to performance measurement and management requires a fundamentally different way of thinking that recognises the interdependencies of often competing agendas in working toward more holistic and harder to measure population outcomes. Outcomes-focused thinking also recognises the risks of 'indicators' for individual agencies or partnerships becoming 'targets' that generate perverse consequences, or working against the overall objective. For instance, the 'reducing re-offending' theme is a prime example where previous police

performance imperatives for 'sanction/detection' of recorded crimes and bringing offences to justice could have impeded more restorative and diversionary approaches to young people who commit crime, had it not been for a number of senior officers within CSPs willing to risk taking a very different and more sustainable approach within the margins of police performance frameworks at the time.

Evidence has shown that putting first-time offenders through the criminal justice system is counter-productive. Instead, Welsh YOTs have sought to ask why the offence occurred and divert young people away from offending. This approach has led to a significant and sustained reduction in the number of first time entrants to the criminal justice system and an overall reduction in recorded crime, reducing the cost to criminal justice agencies involved in the management of young people who commit offences. Research by Public Health Wales (PHW) has enabled agencies and professionals to better understand the causes of offending behaviour such as adverse childhood experiences (ACEs) and adopting trauma-informed approaches through schemes such as Triage and Enhanced Case Management.

Reliance on criminal justice data – analysed by criminal justice analysts – within strategic and tactical assessments will tend to focus on 'symptoms' rather than 'causes' and is therefore unlikely to result in more sustainable partnership prioritisation and programmes of activity.

There is evidence that the responsible authorities are currently suffering from what might be termed 'assessment fatigue' – a constant churn of largely disconnected assessment mechanisms to meet the various statutory requirements around prioritising and planning for partnership activity around community safety, well-being and sustainability, children and young people and health and social care. Our engagement with analysts and researchers, among others, highlighted that this has been exacerbated by significant and sustained cuts in social research and analytical resources for all agencies as a result of public sector austerity measures.

With fewer analysts available to undertake effective 'assessment', respondents suggest the task is made more difficult by barriers such as: incompatible data sets that have to be 'cleansed' before they can provide any analytical value; disparate ICT systems that do not communicate with each other or allow for automated import/export of critical data resulting in high levels of double-keying for those

involved; significant doubt about the veracity and reliability of 'partner' data due to variable standards of data capture and recording; and complexities posed around the different geographical footprints for data collection – ranging from Lower Super Output Areas (LSOAs) through electoral wards and counties to a variety of regional structures that are far from co-terminous. Incompatible geographical sub-division of different data streams impedes analysis.

Evidence provided to the review also identifies that, despite the passage of almost 20 years since the Crime & Disorder Act Section 115 gateway was created to facilitate the sharing of personal data in order to prevent or reduce crime, there remains widespread reluctance among individuals within responsible authorities, and particularly frontline practitioners, to share data, both personal and de-personalised aggregated data sets, with mixed experience around the effectiveness of WASPI.

Inability to access personal data sources negatively impacts the assessment products provided by analysts but has an even starker impact on partnership problem-solving and service commissioning, with agencies tasked with developing appropriate interventions for individuals reliant on incomplete 'jigsaw puzzles' of information. Reluctance to share data also impacts on key activities such as the development of 'problem profiles' – for instance Counter Terrorism Local Profiles (CTLPs) or Serious & Organised Crime profiles which often contain significant gaps in knowledge that could be bridged with improved access to data.

The sharing of personal data is essential for operationalising community safety partnership working and problem-solving but the sharing of aggregated personal and non-personal data for analysis is essential for community safety planning and priority-setting. Section 17A of the Police & Justice Act 2006 both established a common minimum multi-agency data set to support this activity together with a 'duty' to share. We found widespread evidence that Section 17A is no longer central to the annual strategic assessment process. Furthermore, failure to consistently use a minimum common data sets for community safety assessment and planning also prevents benchmarking from area to area and makes it almost impossible for national organisations to aggregate up to a Wales 'average', never mind assess national progress toward improving outcomes. These issues were particularly highlighted in the Future Generations Commissioner for Wales' 2017 report *Well-*

being in Wales: Planning today for a better tomorrow which looked at lessons learned from the first round of the 19 PSB well-being assessments.

There are recent examples of partnerships where agreement was reached on the use of a common minimum data set, for instance in the approach of the five Gwent PSBs to their initial round of well-being assessments, enabling a degree of benchmarking and regional aggregation. It is interesting to note, however, that despite a wealth of supplementary non statutory guidance around effective analysis approaches and a recommended common minimum data set devised by the Wales Local Government Data Unit to support Shared Purpose Shared Future, it is clear from the appraisal of the first round of well-being assessments that this guidance was not widely applied. Concerns were also expressed by a number of review respondents about the general lack of 'community safety' data – other than flawed perception data – utilised in the recent round of PSB assessments.

It is also clear from evidence gathered at multiple review engagements that community safety service or solution commissioning is often based on incomplete needs, gaps and resources data analysis and limited evidence of 'what works' and, equally, what doesn't work. A wide variety of community safety practitioners interviewed state that statutory partners are often committed to collecting data that reveals little about causal factors involved in community safety issues or improving outcomes, but focuses instead on inputs, outputs, throughputs and symptoms (e.g. prevalence of crime). This approach, often driven by government 'performance data' requirements, can be summed up as 'making what's measurable important rather than making what's important measurable'.

An assessment of partnership 'commissioning' activity showed it is often fragmented and takes place within thematic or organisational silos, with commissioners frequently designing and planning services in the absence of critical data from other interdependent processes, a repeat of the 'jigsaw puzzle' syndrome. A clear example of this can be seen in the variety of different ways local and regional partnerships 'commission' separate support and intervention services for substance misuse, supported housing needs, mental health, VAWDASV while the service users themselves are often reliant on all of these services due to their complex needs. There is also evidence of a limited gathering and application of vital service user

feedback information in shaping and designing appropriate citizen-centred community safety services. Equally, practitioners advised that partnership 'commissioning' is often seen as 'additional to' core business for the responsible authorities involved, for instance involving only specific funding streams (e.g. VAWDASV, Substance Misuse) rather than fully mainstreamed. Efforts to strengthen the links with community safety partnership planning – such as the requirement for Area Planning Boards (APBs) to account for and sign-off the LHB ring-fenced core budget allocation for substance misuse treatment services – are a step in the right direction.

On the positive side, the review found evidence that there is growing recognition of the value of 'business intelligence' by the statutory partners in prioritisation of both core business and partnership activity, particularly in an effort to direct ever decreasing resources more effectively to reduce demand for costly public service interventions – what might be termed 'demand management'. There are indications that lessons are being learned from the commercial sector in recognising that disinvestment in business intelligence has a negative impact on the 'bottom line' while investment in socio-demographic segmentation and profiling data – systems such as Mosaic and CACI Acorn – can enhance rich picture intelligence for both strategic and tactical assessment purposes.

There is evidence that – where analysts from different community safety agencies are either co-located or at least work together utilising networks or ICT-enabled virtual networking – there is better understanding of the types of data available, improved sharing and richer analysis. Networks such as the Government Agency Intelligence Network (GAIN) and the Integrated Research Analytics & Performance (IRAP) group have demonstrated value in the effective assessment of trans-regional serious and organised crime activity and in effective integrated offender management (IOM) approaches respectively.

However, even analysts operating in these comparatively effective networks highlight issues with 'slow time' exchange of data posed by incompatible systems and/or data. Multi-agency ICT solutions such as NOMADS, linking police and probation offender management systems to create real time data sharing point the way toward more

effective interventions and has led to a significant increase in the number of risk-based prison recalls.

Slow time sharing and analysis of data for partnership strategic and tactical assessment purposes is perhaps most stark in current partnership responses to cyber-enabled crime, particularly acquisitive crime, which can be fast changing and dynamic by its very nature. Although a number of police forces are currently piloting work led by the Home Office Research, Information and Communications Unit (RICU) to better understand cyber-enabled crime trends and patterns and victim profiles, to facilitate improved prevention activity by local police teams it is clear that the current delay in providing meaningful intelligence briefings to neighbourhood officers and divisional Crime Reduction Tactical Advisors (CRTAs) is too long.

Newport Public Services Board Pill Area Focus (Case Study)

Pillgwenlly (Pill) is an inner city district to the south of Newport centre that became a focus for both local and national media attention following a spike in crime and anti-social behaviour. Pill had seen an increase of violent incidents following a crackdown on crime that had focused on the Newport city centre area.

Pill was originally identified by Newport LSB as an emerging priority and further research and analysis into identified concerns was commissioned as part of the development of 'ward profiles'. In October 2016, Pill once again made headlines following a number of disturbances where several arrests were made by police. There was an initial response by the police and local authority to address the immediate community concerns followed by further intelligence gathering and analysis which showed that the issues were significantly impacting just two LSOAs within the Pill ward rather than the whole ward.

The PSB, which had replaced the LSB, issued a strong mandate to all partners to prioritise action in Pill and a specific area focus group workstream was established by the PSB, chaired by the divisional commander. The focus group developed a draft action plan which has been subsequently refined as a result of further 'rich picture' intelligence gathering and analysis using a broader spread of multi-agency data and information from the local community.

The ongoing Scanning-Analysis-Response-Assessment (SARA) approach adopted by the PSB workstream leads has resulted in a better understanding of the causal factors behind the community safety issues and concerns being experienced by the local community – including an unusual clustering of privately rented Houses in Multiple Occupation (HIMOs) owned by absent landlords, creating a significant population of transient, low income tenants with a range of complex needs within the two LSOAs, and also identifying links between Organised Crime Groups (OCGs) and local street gangs of disengaged young people.

The PSB focus group has now extended its engagement with a wider range of partners and community representatives in order to better understand and address the identified issues and is developing a multi-agency neighbourhood management approach. Although it is still work in progress, the Pill community have acknowledged the initial success of the combined efforts and subsequent media coverage has been significantly more positive.

Some key conclusions drawn by the review team from this case study include:

- The importance of better understanding the causal factors behind identified community safety concerns in order to develop more effective responses and solutions – utilising tried and tested methodologies such as SARA to continue gathering and analysing multi-agency data and community information until the possible solutions and interventions become apparent;
- The value of intelligence products such as ward or neighbourhood profiles in early identification of potentially more serious issues;
- The need for investment in multi-agency analysis – in this case it was fortunate that a senior local authority manager with experience in analysis was involved in the PSB work and therefore able to bridge the gap in local authority analytical resources;
- The absence of 'effective practice' case studies, toolkits and templates led to Newport PSB effectively 'reinventing the wheel' to establish a neighbourhood or locality focused approach to address the issues when similar approaches to such issues had been tried, tested and evaluated in other nearby inner city areas and police and YOT responses to OCG issues were available from counterparts in Merseyside and elsewhere;

- The importance of community involvement in shaping and sustaining potential solutions, including understanding community preferences for engagement – in this case it became apparent that face-to-face contact and outreach was preferable to contact via written format.

Maesteg Early Help Hub (Case Study)

The Early Help Hub in Maesteg is an innovative collaboration between Public Health Wales, South Wales Police, the South Wales PCC, Bridgend Council, Barnardo's and NSPCC to pilot a new ACEs and trauma-informed approach to the policing response to vulnerability and risk.

It follows extensive analysis of calls for service to South Wales Police that generated Public Protection Notices (PPNs), 89% of which were found to have been closed with no further action. The analysis showed the scale of 'vulnerability' demand that traditional policing methods and training are not designed to meet and recognised the need for multi-agency early intervention.

The Maesteg Hub was established to test and evaluate a structured multi-agency early intervention approach to vulnerability with Neighbourhood Policing Teams (NPTs) and to pilot a training programme using an ACEs-informed approach to policing vulnerability. The initial phase is focussing on police contact with children, young people and their carers/parents. If this proves to be effective, this will be widened out to include other groups of vulnerable people.

The aims of the pilot include ensuring neighbourhood and response police teams are trained and equipped to recognise and respond to vulnerability at the earliest opportunity and to work with partners to ensure vulnerable people receive appropriate help and support when they need it.

When police attend an incident and assess that there are vulnerability issues these are recorded and often passed to Social Services via a PPN. The next working day, the NPT screens the incident record for further information and shares this with the Early Help Hub (provided that consent has been given by the vulnerable person). Decisions are then made as to whether Early Help will pick up the case for further involvement, whether the police feel there is further action for them and whether a joint visit would be helpful.

Police officers and Police Community Support Officers (PCSOs) have received training, alongside schools, social landlords and other agencies. This activity is supported by an ACE co-ordinator whose role is to work with agencies to promote and develop ACE understanding and early intervention.

The pilot has been running since June 2017 and an initial evaluation has shown increased confidence in the police responding to vulnerability, an increased understanding of ACEs and an increase in police understanding of the role of partner agencies. It also links with a broader programme of work that aims to better understand the indicators of risk and harm within communities, support strategic assessment of prevalence and causal factors and develop more appropriately targeted interventions, building on local community assets.

Some key conclusions drawn by the review team from this case study include:

- The information review and sifting process is time consuming and 'on top of the day job' for NPT officers and, although the (invest to save) approach can reduce the demand for policing resources in the longer term, still requires up-front investment in appropriate staffing levels;
- The intention is to achieve a rapid turn-around from referral to intervention but the scale of demand was not anticipated so additional resources are needed to keep pace with the workload, particularly as those involved are also required to undertake normal NPT duties (unlike the Lancashire model where dedicated resources were allocated);
- The approach requires new thinking around measuring positive and more holistic outcomes for vulnerable people instead of using standard key performance indicators for the individual agencies involved in order to evidence success and value for money;
- The initial success seems to rely on the enthusiasm of PCSOs (as police officers are less engaged) and there is currently a low level of retention among the PCSO cohort;
- There are logistical issues such as travel time and incompatible data-sharing systems that build in additional delays in responding (e.g. screening takes place in Bridgend which is an hour's drive for a return journey)

2. Resources and Structures

Austerity measures for public sector budgets and third sector funding – much of which comes from the public sector in the form of grants or service commissioning – has had a significant impact on community safety partnership working in Wales.

The Auditor General stated:

> "Funding of community safety has changed significantly in the last six years. Authorities used to receive grants from the Home Office but these are now part of the Police Main Grant…in real terms (their) spending on policing and community safety has fallen. The amount of grant monies provided by the Welsh Government to support public bodies in tackling community safety is growing. The complexities of the overall funding regime for community safety, and its short-term nature, are reducing opportunities to improve value for money. Spreading money widely reduces the benefits that can be realised from pooling and targeting funding.

> "Cuts to local-authority budgets have resulted in a real terms funding reduction of 32.7% for the management and co-ordination of community safety. Community-safety partnerships recognise that they need to secure alternative sources of funding to sustain their existence but to date little work has been undertaken to access new finance streams. With resources continuing to fall, it is questionable if the current structures for community safety are sustainable or able to deliver what is needed."

The Auditor General went on to recommend that Welsh Government, PCCs and local authorities should review current grant-funding arrangements and move to pooled budgets with longer-term funding commitments to support delivery bodies to improve project and workforce planning that focusses on delivering the priorities of the national community-safety strategy.

It was also recommended that PCCs and local authorities should revise the systems for managing community-safety risks and introduce monitoring and review arrangements that focus on assuring the public that money spent on community safety is resulting in better outcomes for people in Wales.

The review has identified that decreasing resources has placed community safety partnership working at risk. The WLGA survey of local authority leads has estimated that approximately 60% of Home Office funding for CSP working has been lost in recent years while the USW research points to direct impacts upon community safety teams and structures, analytical capacity, training, community engagement activity and expertise as well as community safety services such as CCTV, wardens, etc.,. Shrinking community safety teams has also created a tendency towards generalists – officers whose roles encompass wider policy area and partnership management or broader responsibilities for managing a number of community safety related services – rather than specialists. Equally, we can see community safety leads being given additional, sometimes unrelated responsibilities ('community safety and…') or the addition of community safety responsibility to an already large and complex portfolio (e.g. 'housing and community safety').

This has contributed to a significant dilution of 'appropriate skills and knowledge' within CSPs, exacerbated by the Home Office's decision in 2010/11 to remove the Crime Reduction website together with a comprehensive programme of accredited multi-agency problem-solving training, resources, toolkits, guidance, effective practice case studies, academic research and evaluations. Peer support networks such as the National Community Safety Network (NCSN) and Wales Association of Community Safety Officers (WACSO) have struggled to survive and no longer play a significant role in policy and practice development. In contrast, Scottish Government continues to support the Scottish Community Safety Network (SCSN) as an arm's length charity, in partnership with CoSLA (Convention of Scottish Local Authorities), and maintains a programme of policy and practice development work together with fostering appropriate skills and knowledge among Scottish community safety professionals – despite the absence of a statutory basis for community safety partnership working under Scottish legislation.

The cuts to partnership funding identified above coincide with a 20% reduction of police core budgets since 2010 and a 27% reduction in Welsh local authority funding (after education funding is excluded) with corresponding average service spend reductions as high as 52% for areas such as regulatory services, 42% for cultural and leisure services and 25% for housing services, all of which make a significant contribution to the community safety agenda.

It is claimed that the consequences of these reductions in resources available to support partnership working are that the responsible authorities have tended to 'shrink back into silos' and focus on what is deemed to be 'core business' or achieving the statutory minimum requirement, with partnership working viewed as 'nice to' but not essential. The very nature of partnership working is both time and labour intensive, involving attendance at a number of multi-agency meetings, lengthy discussion and negotiations and follow up actions, not least cascading information internally to others within respective organisations who need to be involved or to make further decisions to support partnership action. For those officers whose role encompasses a broad spectrum of community safety themes this means having to prioritise which meetings to attend, creating gaps that undermine the very fabric of partnership working. Although this affects all partners, the impact is felt most acutely by smaller third sector agencies involved in the delivery of community safety services.

Although it could be argued that regionalisation reduces the number of meetings needed to progress partnership working, a complexity of multiple regional footprints in some areas combined with duplicate local structures to facilitate operational delivery of strategic priorities and unclear governance has led to a proliferation of partnership networks and structures as evidenced in the review's stakeholder mapping exercise (**Appendix viii**). Furthermore, although there has been an increase of both teleconferencing and video-conferencing to facilitate 'virtual attendance' at meetings, particularly regional and national boards or networks where greater travelling distance is involved, the uptake of technology to facilitate virtual networking has been limited and there is still a reliance on physical meetings.

The key issue with regionalisation identified by respondents is that although it may suit strategic approaches to community safety partnership working it can become a barrier to more effective tactical and operational approaches, which are generally local and specific in nature. Different communities may experience similar community safety issues but applying uniform solutions rarely works. Regionalisation also presents a significant challenge around democratic accountability – with councillors increasingly required to make decisions on strategic regional boards that reflect a broader regional interest rather than the more colloquial interests of their

specific constituencies or local authorities whose interests they were elected to represent.

Regional partnership arrangements also present a particular challenge for smaller third sector organisations and community safety service providers that, on one hand can bring additional and much-needed resources in the shape of volunteering and unrestricted funding together with their community-based strengths to the table but, on the other, struggle to participate in the range of necessary meetings or scale up to meet regional delivery requirements that also undermine their local foundations and community roots.

Community safety practitioners state that stretching resources too thinly also leads to a vicious circle of having to prioritise the most urgent areas of work, leaving no time or capacity to look ahead – what has been described as 'fire fighting' and reacting to immediate crises with no opportunity to be proactive and shift the focus toward prevention and future demand management. With fewer analytical resources available to partnerships, and the majority of those that are available being provided by the police, there is an inevitable focus on the analysis of crime and community safety incidents, patterns and trends rather than the underlying causes when undertaking assessments that direct partnership priority setting. This reinforces the reactive 'fire-fighting' theme.

The sustainable development principle within the Well-being of Future Generations Act clearly focuses on planning for the long term and investing to save by reducing future demand for public service 'crisis interventions' – something that community safety partnership working has traditionally aimed to achieve, such as the significant reduction in first time entrants to the criminal justice system through supporting youth justice teams with diversion and early intervention initiatives.

However the opportunities for investing to save are becoming more limited while present demand is rising – for instance in working to identify unmet need in violence against women through increased reporting – and the immediate need for crisis intervention is growing. Almost half of the total Welsh Government budget is spent on healthcare, the majority of which is focused on 'treatment', with a predicted £2.5b NHS funding gap in 2025/26 unless the current trend in demand is addressed. There is evidence that although community safety partners are trying to reduce future

demand – for instance by investing grant funding in violence prevention, trauma-informed practice and work to tackle ACEs and to prevent and reduce substance misuse – the proportion of preventative spend remains comparatively low. Thresholds for accessing statutory support services – particularly social services and mental health – often work against the focus on prevention and early intervention sought by partnership initiatives such as the Multi-Agency Safeguarding Hub (MASH) or Early Intervention Hub.

A positive example of agencies combining to invest to save can be seen in Swansea's HelpPoint, praised by the Cabinet Secretary for Communities & Children as effective practice. Initiated by the South Wales PCC in response to late night economy issues in the city, it is now jointly funded to the tune of £105,000 per annum by South Wales Police, the Welsh Ambulance Service NHS Trust (WAST) and Abertawe Bro Morgannwg University (ABMU) Health Board. In 12 months it saved 1,300 ambulance journeys, 1,100 admissions to A&E and on 1,300 occasions allowed police officers back onto the street instead of having to wait with a vulnerable person for the arrival of an ambulance. Police Student Volunteers and St John Ambulance volunteers enable the system to work and, while partners have to make their contributions from existing resources, it allows existing resources to be deployed more effectively and those behind the scheme say it is as good as increasing the number of staff available at times of excessive pressure for all three services. A Health Economics Evaluation of the HelpPoint conducted by Swansea University estimated the facility saves an annual cost to public services of £655,360. This saving is distributed at: £414,843 for ABMU Health Board (people diverted from Emergency Departments); £180,224 for WAST (reduced ambulance calls) and £60,293 for South Wales Police (3,120 hours saved).

The Home Office previously co-ordinated periodic research to audit and quantify the annual 'cost of crime' to the public purse and UK economy which provided CDRPs and CSPs in England and Wales with the basis of rudimentary 'cost benefit analysis' business cases for prevention investment as well as a means to engage otherwise reluctant partners in joint working to prevent and reduce crime. This exercise does not appear to have been repeated since 2010 and community safety leads indicate that they now struggle to quantify the value of the work they undertake, which hampers efforts to engage more reluctant partners such as LHBs.

Chiming with the Auditor General's 2016 report, the review team identified a confusion of community safety funding streams from multiple governmental sources, with many of grants tied to quite prescriptive and inflexible terms and conditions and requiring significant levels of administrative effort, monitoring and reporting for what are usually comparatively small sums of money. With many of the funding streams the funding is usually annual in nature and providing insufficient timescales and stability to allow for the effective commissioning and contracting of community safety services or time for the benefits of interventions to be realised. Community safety practitioners also point to 'end-of-year' spend deadlines as counter-productive with perennial last minute rushes to spend budgets by March 31st when longer term investment would be more prudent.

Although PSBs are still comparatively new, having just completed their initial well-being assessments and presently developing their inaugural set of priorities and plans, their evolution from LSBs provides a strong foundation of several years of integrated planning and partnership experience to build upon. However, many of those who engaged with the review reported there is still a focus on changing structure and process – 'ticking boxes' against the statutory guidance, as one respondent described it – with insufficient effort to changing organisational cultures. There still appears to be a widespread reluctance to pool core budgets or to reshape core services in what might be described as a 'total place' or 'total budget' approach that would really bring PSBs to life and fundamentally change the way public services are configured and delivered to provide sustainable solutions to citizens' needs. There is evidence that some LSBs and, latterly, PSBs have considered the potential of 'Total Place' pilots such as Total Cumbria in developing their thinking however local authority chief executives in particular report a general reluctance among key partners to give serious consideration to re-shaping the overall public service expenditure in their areas to redesign core services in line with the Well-being of Future Generations Act.

Several PSBs are experimenting with new approaches to intelligence-led and evidence-based multi-agency neighbourhood or locality management, including establishing co-located multi-disciplinary teams with a focus on long term problem-solving in some of Wales' most deprived communities. Links between such initiatives and the ACEs agenda together with developments in early intervention 'hubs' appear

to be showing encouraging signs of early success. Combined service centres and neighbourhood or locality 'hubs' which bring multiple services and partners closer to citizens and communities are also demonstrating benefits, not least greater levels of citizen engagement. There is evidence that co-location of multi-disciplinary teams reduces the requirement for meetings and increases capacity, capability and information sharing – with the principle of the whole being greater than the sum of its parts – however co-location can also prove problematic in austere times where professionals have been given multiple roles and responsibilities – some of which do not accord with being co-located.

One of the foundational elements of the original 1998 Act – and still as relevant today – is Section 17, commonly known as the community safety 'mainstreaming requirement'. Section 17 applies to the 'responsible authorities' under the Act and states:

> "Without prejudice to any other obligations imposed upon it, it shall be the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all it reasonably can to **prevent** crime and disorder, anti social behaviour, behaviour adversely affecting the environment and substance misuse and to reduce re-offending in its area."

Although Section 17 requires a similar approach to the Equalities Act – in other words robust consideration of the impact of any decision-making and service planning in terms of community safety – there is presently no sanction for a responsible authority that disregards its responsibility under the 1998 Act. A number of review respondents describe Section 17 as a 'lamb in wolf's clothing' and have called for this component of the legislation to be strengthened, particularly in relation to the responsible authorities' involvement in strategic planning partnerships such as PSBs or in core service planning and commissioning. The lack of sanctions associated with Section 17 has been attributed by review respondents to sustained 'core budget' disinvestment in community safety resources since the introduction of public service austerity measures and the changes to Home Office funding streams that reduced the overall funding available to CSPs.

Evidence shows that there remains a mixed level of engagement and involvement of LHBs and other health service providers in community safety partnership working, particularly those services and programmes focused on prevention and early intervention, with community safety partners stating that the 'health focus' remains firmly on treatment. There is a growing body of work – led by PHW and linked to Welsh Government's ACEs Hub – looking the benefits of adopting trauma-informed practice and focusing on ACEs in areas such as violence prevention, tackling substance misuse and addressing child sexual exploitation. However our engagement with practitioners, particularly those involved in youth justice services and clinical psychology, show the current level of mental health service provision is insufficient and the way services are presently delivered may not be appropriate to meeting the needs of more chaotic service users. An estimated 70% of police service demand is generated by mental and emotional health conditions with forces identifying a lack of services to more appropriately manage these demands.

Many partnerships report that LHB representatives attending their meetings are generally willing partners however they state that the complexity of LHB organisational structures and the urgent demands of meeting present health treatment needs mitigates against more effective engagement and involvement in more preventative community safety partnership activity. LHBs are generally well embedded within some community safety programmes, such as substance misuse and VAWDASV, but still tend to focus on the provision of treatment services. LHBs can bring a wealth of service planning and commissioning expertise to partnership working, where engagement and involvement is effective. There are some reported tensions between some of the substance misuse APBs and community safety leads and it is apparent that the lines of governance and accountability to CSPs – established by the Police Reform Act in 2002 – are no longer clear.

LHB leads who attend multiple community safety strategy and planning groups for different counties within their region also report their organisation experiences difficulty in meeting significantly divergent and highly individual approaches required by local problem-solving, with limited flexibility or capacity to adopt contrasting approaches in neighbouring counties. They suggest that traditional partnership structures and processes do not lend themselves easily to better engagement with 'health' and there is often a lack of understanding about how health services are

structured and configured, and the differing roles of health professionals within them. This was particularly highlighted by respondents from Betsi Cadwaladr, Hywel Dda and Aneurin Bevan Health Boards who regularly attend several local partnerships in their respective areas.

Third sector agencies are increasingly providing a wide range of community safety services – from victim support through to perpetrator programmes and from anti social behaviour diversion schemes through to counter radicalisation activity. Much of this activity is funded by grant schemes – some within the 'CSP remit' and some independent of partnership activity – while other programmes are delivered via public sector commissioning and contracting arrangements. Respondents from both the third and public sectors state that the benefits of involving third sector organisations include a greater degree of flexibility and adaptability and the ability to implement change more quickly than statutory agencies, combined with an enthusiast-borne commitment for the subject area and specialist expertise and experience together with the added value of unrestricted funding, volunteering and strong community links and engagement. Respondents also acknowledge that such strengths can also result in weaknesses like fixation on single-issues, unrealistic lobbying and failure to 'see the bigger picture'.

However, respondents from third sector agencies have reported that statutory agencies often pay 'lip service' to notions of involvement and co-production, and that they are not always fair, open or transparent in their dealings with the sector. They suggest there is a tendency toward 'marketization' of small, specialist third sector agencies – fuelled by fiercer competition to secure ever decreasing resources and traditional competitive tendering procurement approaches. Where third sector consortia arrangements are developed by statutory agencies to try to remove the sting of marketization and protect community-based specialist services, these often try to over simplify in an effort to only deal with a single lead agency, leading to erosion of specialisms and the encouragement of generalist agencies.

There is a suggestion that competitive procurement processes with a focus on achieving lower costs and value for money can also result in the commissioning and/or funding of services that may appear cheaper in the short term but prove to be less cost effective in the longer term through 'revolving door' syndrome, with service

users requiring repeated interventions. Some agencies report that a lack of nationally agreed and adopted quality standards for many areas of community safety service delivery – such as those employed by substance misuse commissioners – contribute to an unequal market place where commissioners struggle to compare like for like when considering submitted tenders, with apparently more costly services that work to meet higher standards unable to compete with cheaper providers who do not.

Public sector leads, on the other hand, report issues with a lack of robust governance and financial management arrangements when dealing with third sector providers, a lack of clarity around the true costs of providing services, particularly what are known as 'core costs', and 'who is paying for what', with suspected double counting of inputs and outputs when providing project monitoring and evaluation reports for multiple funders. Public sector commissioners also struggle to 'upscale' highly effective but small community-based services to ensure equality of provision across a county or regional area, creating postcode lottery of provision.

Cwm Taf Multi-Agency Safeguarding Hub (MASH) (Case Study)

Cwm Taf MASH was commissioned by the regional Safeguarding Board in response to recommendations arising from the serious case review into the tragic death of child MM in the local area and has been fully operational since May 2015. The review highlighted a need for greater connectivity and collaboration between the relevant teams of professionals and agencies, together with improvements to information sharing.

Located in Pontypridd Police Station and comprising of a number of co-located services including children's and adults' services from both Rhondda Cynon Taf and Merthyr Tydfil County Borough Council's, education services, Cwm Taf LHB, probation, police and third sector services, its remit includes child protection, safeguarding vulnerable adults and domestic abuse multi-agency risk assessment conferences (MARAC).

The objectives of the unit are to ensure: improved coordination and consistency of threshold-for-service/decision-making when a concern is raised; improved response

times leading to earlier and more effective interventions; a reduction of repeat referrals.

Key to its success is a 'team ethos' with representatives of the contributing services mixed together within a single room deliberately designed to look and feel different to a police office, with the only demarcations used being 'adult' specialisms and 'children's' specialisms. A multi agency information management and case-handling tool called M-Hub sits at the heart of the approach with a drive toward real-time live information sharing.

The team had to overcome issues such as lack of awareness among wider teams, such as police call handlers and response teams and schools and initial reluctance to share personal data, with the team now 'by-passing' the need to establish a WASPI protocol and using a simple 'legal gateway' to sharing document. Data and systems incompatibility and 'double-keying' remain issues for the team, as do service thresholds.

In its first year, the MASH established baselines for measuring future success and has already evidenced reduced costs for agencies associated with attending case management and client meetings, the release of resources for other purposes, greater efficiency and speed in securing effective interventions and improved outcomes for service users with early evidence of reductions in repeat referrals.

Importantly, the co-location and improved information sharing has led to early identification of additional risks and vulnerabilities – for instance referrals around domestic violence issues have more quickly identified children at risk while referrals of child safeguarding concerns have identified issues of domestic violence in the home.

Some key conclusions drawn by the review team from this case study include:

- The importance of real-time personal information sharing between agencies in understanding and managing the issues, risks and vulnerabilities involved in individual cases and avoiding the delayed piecing together of the 'jigsaw puzzle' of crucial data;

- The need for improved awareness-raising around WASPI and legal gateways to information sharing among front-line practitioners who otherwise do not feel confident to share;

- The need to improve compatibility of data from different agencies as well as the compatibility of systems to reduce the need for 'double-keying' and limit the opportunities for error or data loss;

- Concerns that the current 'thresholds' for vital specialist services such as social services and mental health treatment can mitigate against earlier and therefore more effective and less costly interventions when it is highly likely the threshold will be met at some future point;

- The need for greater resilience within small co-located specialist teams – for instance there is only one education worker to cover all the schools and safeguarding leads for two county boroughs, with no holiday cover;

- The need to 'mainstream' effective practice developed through multi-agency co-located teams into day-to-day core business for the agencies and services involved.

3. Governance and Leadership

The Auditor General's 2016 report concluded that complex responsibilities make it difficult for public bodies to co-ordinate a strategic approach to community safety, which weakens collective leadership and accountability and undermines the potential to help people stay safe.

"As a result of devolution the Welsh and UK Government's policy approach to the various elements of community safety are however developing in different ways and may therefore diverge in practice and approach. Local policing in Wales is not devolved and is delivered via four police forces and four Police and Crime Commissioners. They take their lead from the Home Office. To be truly effective the police need to work with local authorities because local government is responsible for managing the local community safety partnerships.

"However, community safety partnerships operate at a local authority, not police force, level. The guidance for partnerships is produced by the Home

Office to whom they are accountable. However the bulk of public funding to local authorities comes from Welsh Government. The complexities of the lines of accountability means that no single body either leads on or takes responsibility for all aspects of community safety within Wales.

"The Welsh Government has no single strategy for community safety and has focussed its activity on delivering the Programme for Government. Whilst all local authorities and the four Police and Crime Commissioners have plans, these are not consistently aligned to ensure the best use of resources and maximise impact and there are no areas where national, regional and local bodies have the same priority. Disjointed planning and poor co-ordination can create a risk of organisations either duplicating activity or no one focussing on the most important issues."

The Auditor General recommended that Welsh Government, the Home Office, PCCs and local authorities should improve strategic planning to better co-ordinate activity for community safety by replacing the existing planning framework with a national strategy supported by regional and local plans that are focused on delivering the agreed national community-safety priorities. These regional and local plans should be supported by the creation of comprehensive action plans that cover the work of all partners and clearly identify the regional and local contribution in meeting the national priorities for community safety. The 2016 report also recommended improvements to strategic partnership working by formally creating effective community-safety boards that replace existing community-safety structures that formalise and draw together the work of Welsh Government, police forces, local authorities, health boards, fire and rescue authorities, WACSO and other key stakeholders.

The Welsh Government, in corresponding with Nick Ramsay AM, chair of the National Assembly for Wales Public Accounts Committee in November 2016, acknowledged many of the challenges outlined in the Auditor General's report and agreed this review and refresh of community safety could, among other things, take account of:

- the need for a shared understanding of Community Safety;

- developments in UK and Welsh legislation and whether there is a need for further reform, including the opportunities offered by the Wales Bill;

- developments at the UK policy level, for example prison reform;

- developments in single planning processes through Public Services Boards;

- recognising interdependencies between the activities of UK and Welsh Government and PCCs and the potential for aligning these better;

- developing streamlined planning, governance, assurance and performance mechanisms in a structure which will include all partners and recognise the opportunities offered by our proposed reforms in local government; and

- that those mechanisms will be efficient and effective, accountabilities will be transparent and duplication of effort will be minimised.

The review has predictably identified that the 'governance and leadership' challenges identified by the Auditor General are unarguably the most significant and problematic to be overcome if the community safety agenda in Wales is to be "moved forward" by any refresh. However the strategic planning framework described in the 2016 report's first three recommendations is highly unlikely to deliver the required progress and – worst still – would not meet the requirements for integrated and collaborative public services partnership arrangements prescribed by the Well-being of Future Generations Act.

An overwhelming number of respondents who engaged with the review team identified a complexity of often conflicting or, at the least, confusing operational delivery guidance and prescription issued by different government divisions – both in terms of the already identified divergence between Cardiff and Westminster but also within the respective governments themselves. Although there are mechanisms in place for dialogue between officials from UK and Welsh Governments, and for officials to discuss cross-cutting themes with colleagues from different divisions within their own organisations, it is apparent that these are not as effective as they could be. CSPs point to an era when the Home Office Crime Team Wales and Welsh Government's Community Safety Division were largely co-located and with effective exchange and secondment arrangements between the two as the time when they were provided with the most consistent and least contradictory messaging about practice and approach, although it should be noted that the political differences

between the two governments were less stark. Community safety practitioners, particularly those who have been leading partnership working for some time, state that the historic debate seems to polarise around an over-simplified viewpoint with some echoes of truth that 'UK Government doesn't get Wales and Welsh Government doesn't get community safety partnerships'.

Respondents suggest that there is good engagement with Welsh-based or devolution-focused officials from UK Government, who have a better understanding of the complexities of delivering UK Government policy within a devolved landscape. However there are questions about the capacity of a very limited number of officials to keep abreast of the scale and pace of UK Government policy developments that impact on Wales – particularly as the UK prepares for Brexit. There are questions over how much consultation takes place with Welsh-based or devolution-focused UK Government officials to try to assess the implications for agencies operating in Wales or even Welsh Government itself before UK policy announcements are made. Nevertheless there is a body of evidence to show that non-devolved policing and justice agencies take a very pragmatic approach in their efforts to implement UK Government policy and welcome full engagement and dialogue with the Welsh Government to minimise the negative aspects of approaches that have not fully considered the devolved landscape.

Although a non-devolved institution, PCCs in Wales consider themselves to be 'devolved' and able to apply UK Government policing and justice policy in a way that best suits Welsh circumstances and arrangements and the 2011 amendments to the 1998 Act provides them with considerable scope for flexibility and autonomy from the Home Office when determining their Police & Crime Plans. It is also worth noting that PCCs are not 'responsible authorities' under the 1998 Act and have no statutory requirement to either be invited to or participate in a CSP. The 2011 amendments require PCCs and CSPs to have 'regard' to each others plans and priorities while the PCC is also able to call community safety 'responsible authorities' in their area to a meeting to discuss force-wide issues and to request a written report from the CSP. In practice they see themselves as community safety partners operating in a devolved environment and all four commissioners have stated their view that the importance of partnership working in Wales is such that the devolution of responsibility for policing

and criminal justice to Welsh Government is desirable and will eventually prove inevitable.

The 2011 Act specifies that these PCC powers do not apply to matters related to 'devolved functions' however, in community safety partnership working, there are no clear demarcations between 'devolved' and 'non-devolved' functions for local government, fire service and health. For example, a PCC can request a report on how devolved partners are meeting their non-devolved statutory requirement to 'reduce re-offending', but the provision of education, training and support or health and social care interventions for offenders are all devolved areas of responsibility, seemingly making a nonsense of the qualifier.

PCCs nevertheless retain control over a significant proportion of funding previously allocated by the Home Office directly to CSPs and remain committed to supporting local partnership working in their respective force areas. For example, Safer Gwent was established to support the five Gwent local authorities and their partners in maintaining a focus on community safety at a time when austerity and 'partnership rationalisation' was negatively impacting the local CSPs. All four Welsh PCCs continue to invest their budgets in the programmes and activities developed by the partnerships within their regions, often supporting vital community safety services at risk of collapse through the withdrawal of other funding mechanisms.

Despite the strengths and influence of Welsh PCCs in supporting community safety partnership working, practitioners – particularly those within local authorities and policing – point to the disbanding of the Home Office Crime Team Wales as a turning point in the drive for improved CSP working and performance, coming at the same time as austerity measures and Welsh Government calls for 'partnership rationalisation'. Home Office officials clearly saw PCCs as having an integral role in progressing community safety partnership working but local authority leads in particular suggest the start-up challenges for the newly elected commissioners, some of whom were not fully committed to co-operating with and supporting CSPs, resulted in a 'perfect storm' of partnership dilution and disbandment. Many respondents suggest that, with increasing policy and practice divergence around community safety issues and the Home Office retaining a comparatively 'hands-off' approach to CSPs, Welsh Government now needs to step up and provide more

effective leadership of the agenda. This view is supported by the four Welsh PCCs who say that, because of the crucial need to work locally with devolved bodies, they look to Welsh Government rather than to the Home Office and that they frequently have to intervene in meetings held on an England and Wales basis to say 'It's different in Wales'.

However, practitioners also complain that 'over prescription' – particularly around the operational delivery of community safety but also concerning mandated regional structures – assumes a 'one-size-fits-all' approach that does not allow for regional or local variations or the flexibility to respond most appropriately to local needs. Over-prescription by government, whether UK or Welsh, also indicates a lack of trust in delivery partners and there is a call for greater focus within government monitoring arrangements on the outcomes delivered rather than the means by which they are delivered. This criticism is particularly applied to the terms and conditions applied to government funding streams where there is a tendency to focus on measuring inputs and outputs rather than the intended outcomes. As a result, key performance indicators – whether set by government or the individual agency – often become key performance 'targets' which then lead to unintended and sometimes perverse consequences including the failure to meet intended outcomes.

Opportunities for regular and meaningful dialogue between policy makers from both governments and community safety practitioners are presently limited and the suggestion is this has resulted in unrealistic policy-making not grounded in 'real world' practicalities or evidence of 'what works'. In his report, the Auditor General noted: "The suspension of the All-Wales Community Safety Advisory Board (AWCSAB) and the diminishing role of the Wales Association for Community Safety Officers (WACSO) are seen by some partners as having reduced opportunities for joint working on community safety." It could be argued that AWCSAB provided a useful forum for discussion, but many review respondents suggest it was little more than a 'talking shop' with little or no connectivity to local community safety partnership working and its relationship with other relevant national networks such as the All Wales Criminal Justice Board (AWCJB) was vague with the suggestion of duplication of remit. It is clear that the erosion of the local authority 'community safety officer/manager' role since public sector austerity has left WACSO in a

parlous state with no active chair and recent meetings focused on debate about the network's future existence.

One respondent, actively involved in WACSO since 2003, commented that the review itself has prompted more dialogue with Welsh Government officials about community safety in its broadest sense during the past eight months than in the previous five years. It was suggested that previous Welsh Government involvement with WACSO was largely restricted to discussion around specific 'devolved' themes such as substance misuse, youth justice and community cohesion with a reluctance to engage on what were deemed to be 'non-devolved' matters. Home Office engagement with WACSO has been substantially curtailed since the 2011/12 changes to the Home Office Crime Team Wales significantly reduced capacity for regular dialogue.

Other national and regional forums such as the AWCJB, Local Criminal Justice Boards (LCJBs) and IOM Cymru Board arrangements may have the capacity for supporting community safety policy and practice development, as well as providing an element of governance, but do not currently have the necessary wider engagement and involvement of devolved agencies such as local authorities, social services and LHBs to venture much beyond core criminal justice themes. Respondents also identified that these national and regional boards evidence a degree of overlap and duplications and suggest that rationalisation and simplification is required. Additionally, respondents express concerns that these forums sometimes struggle to provide linkages and 'line-of-sight' between their strategic policy and practice deliberations and priority setting and how these are operationalised by front line teams and community safety projects.

The Auditor General noted the complexity and confusion of the community safety partnership landscape, describing a plethora of interdependent and often overlapping multi-agency boards at national, regional and local levels. Lines of governance and accountability are further muddled by the range of regional footprints, dependent on theme, that do not always map comfortably against regional organisational boundaries. The report's recommendation is to "Improve strategic partnership working by formally creating effective community-safety boards that replace existing community-safety structures." It also highlights the non-statutory

regional community safety boards presently operating in North Wales and Gwent as opportunities for reducing duplication and facilitating better partnership working.

However, the Well-being of Future Generations Act challenges public bodies to act in a more integrated, collaborative and cross-cutting way and sets out the requirement for PSBs to establish well-being plans in which the: "…well-being goals must be considered as an integrated set of seven to ensure that the relevant links are made in the context of improving the economic, social, environmental and cultural well-being of Wales." As a result, many PSBs have incorporated community safety themes within their assessment, prioritisation and planning processes and include 'safer' themed boards within their structures in place of a 'stand-alone' CSP.

The precedent for such 'single integrated planning' and 'partnership rationalisation' was set by the Welsh Government's 2012 statutory guidance *Shared Purpose, Shared Delivery* which urged local authorities to discharge their responsibilities under the Crime & Disorder Act via the LSBs established at the time. Until 2011, councils were required to have a community safety strategy group with an identified 'chair' and a minimum number of meetings per year, one of which had to be open to members of the public. The Police Reform & Social Responsibility Act 2011 introduced a number of changes to the 1998 Act including the de-regulation of a number of elements prescribing the operation of CSPs, allowing their statutory functions (strategic assessment, planning and working together) to be discharged via more flexible partnership and planning arrangements. These changes were formalised within the Crime & Disorder (Formulation and Implementation of Strategy) (Wales) (Amendment) Regulations 2011.

Although the intent of *Shared Purpose, Shared Delivery* was to streamline partnership structures and governance arrangements and promote more effective cross-cutting activity involving public services, it is clear from the review's stakeholder mapping exercise (**Appendix viii**) that LSBs and, subsequently PSBs, have not fully achieved this aspiration and – if anything – the partnership landscape is more cluttered and confused now than it was prior to 2012. Many of the structures and 'sub groups' – particularly at a local level – are historic in nature and prompted through well meaning efforts to engage a wide range of stakeholders who want to ensure their specific area of focus is adequately recognised by the over-arching

partnership. However respondents point to political imperatives from both Welsh and UK Governments that have resulted in the establishment of additional national and regional bodies intended to progress specific themes such as serious & organised crime, cohesion, counter terrorism and modern slavery. These often spawn replicate local boards to manage local delivery of national and regional priorities.

The added complexity of discharging statutory community safety responsibilities via PSBs is that non devolved agencies such as the police, PCCs and probation are only 'invited participants' under the Well-being of Future Generations Act and are not statutory members under obligation to conform to the principles of the 2015 Act. Equally, regional arrangements, such as the Gwent and North Wales community safety boards or Cwm Taf PSB, which has responsibility for community safety functions across its region, can only achieve 'statutory' status with the full agreement of all the 'responsible authorities' listed in Section 5 of the Crime & Disorder Act including all council chief executives within the region. With the emergence of regional boards responsible for the management of specific community safety issues – such as VAWDASV, substance misuse or CONTEST – governance is derived from the 'responsible authorities' cited within the 1998 Act (as amended).

Review respondents state there is currently widespread confusion about governance and accountability around both community safety partnership working per se and individual community safety themes where regional arrangements and PSBs are concerned. For instance, addressing vulnerability, risk and harm are common factors for community safety partners to focus on in developing plans and services around issues such as VAWDASV, substance misuse, Child Sexual Exploitation (CSE) and PREVENT – presenting considerable overlap with regional safeguarding arrangements which derive governance from the Social Services and Well-Being (Wales) Act that applies to devolved organisations.

Other regional and national organisations – particularly agencies responsible for the delivery of criminal justice services such as courts, probation, prisons, prosecution etc., that do not benefit from geographic divisional structures – report difficulties in effectively engaging with PSBs due to limited capacity to attend multiple meetings. This can become problematic where a PSB is fulfilling the role of a CSP.

On the positive side, PSBs, like their LSB predecessors, have the potential for developing more 'place-based' integrated public service approaches including place-based budgeting and locality or neighbourhood focused multi-agency teams or service hubs. With more robust engagement from health, education and social services, they also present opportunities for greater focus on understanding and working to resolve the causal factors that can lead to crime and disorder, such as ACEs. Community safety leads suggest that, where PSBs have fully engaged with the community safety agenda, there is a commitment at the most senior level to prioritise and resource appropriate activity and, conversely, where PSBs do not consider community safety to be a priority that senior level commitment is lacking. There is a counter argument, however, that PSBs should not be over-burdened by routine 'community planning' requirements including community safety.

In areas where PSBs have assumed a community safety mandate, local authority community safety lead officers report tensions around their roles and remits – fluctuating from managing the community safety elements within an integrated partnership structure and planning process, often as part of a wider 'policy brief', and simultaneously trying to ensure a balance between partnership strategy and planning and operational delivery of community safety services. The contrasting approach of Wales' 22 unitary authorities to the 'community safety officer/manager' role is not a new phenomenon and was identified in the Cardiff University research report commissioned by WACSO in 2007/8. Although almost all councils at the time benefited from an officer with a 'community safety' job title, the levels of remuneration varied significantly as did the size and nature of responsibilities – ranging from 'one-man-bands' to large community safety departments and from policy-based roles to operational service delivery managers. Despite these variances the WACSO report did identify a common bond in that the leads from all 22 areas benefited from a baseline of 'appropriate skills and knowledge' centred around partnership co-ordination and intelligence-led multi-agency problem-solving.

It is often said that 'personalities drive partnerships' as they do organisations – a recurring theme identified in many of the engagements conducted as part of the review process. CSPs – in their entirety or within thematic sub groups – have always struggled with the constant churn of individual leaders and champions who come and go – particularly given the significant influence of policing where there is a

culture of rotation to provide officers with a wide remit of experience and skills that often leads to promotion and re-posting. Other responsible authorities also struggle to maintain consistency of personalities, for instance with austerity prompting redundancies, early retirement or much wider portfolios for local authority officers and changes to cabinet or executive portfolio holders with every successive council election. In 'group dynamics' terms, it leaves partnership boards forever in a phase of 'forming and storming' and rarely able to sustain 'norming and performing' for any length of time. These issues have been consistently and repeatedly identified throughout review engagements but with no obvious solution.

As previously highlighted, the community safety officer/manager role – where it still exists – has been significantly diluted but respondents identify the importance of having a 'chief whip' to guide and champion community safety priorities through a more complex partnership environment. The precise nature of such a role is debatable, with some respondents suggesting a refresh of the local authority community safety manager/officer role while others believe a more senior chief officer role or even an elected cabinet member would be more influential. Others argue that a 'chief whip' would detract from corporate responsibility for community safety. Overall, it was felt that the key ingredients to such a role are focus, appropriate skills and knowledge and continuity although it is also vital to ensure that partnership systems and processes are designed to mitigate changes in personnel.

Welsh Government's January 2017 consultation paper on local government reform *Reforming Local Government: Resilient and Renewed* posed a question about whether or not CSPs should move to regional footprints. Although 63% of respondents were supportive, almost 65% of local authorities who responded were not in favour of a mandated regionalisation but many were supportive of flexibility to regionalise CSP arrangements if locally appropriate. Safer Gwent, a non-statutory regional CSP established by the Gwent PCC, is (at the time of writing) negotiating with the five local authorities to seek formal agreement for assuming responsibility for discharging their statutory responsibilities under the 1998 Act. There is also discussion about the feasibility of establishing a single PSB for Gwent. The challenge for such partnerships – covering a large region with a diversity of communities – will be in translating strategic priorities into local actions. Community safety is, after all, community-based.

Regional 'statutory' CSPs also pose a new challenge in terms of accountability. In the 2016 report the Auditor General commented that "Processes for overseeing and challenging performance are not aligned…" and added that risk management processes and mechanisms for both CSPs and PCCs are wanting. Both CSPs and PSBs are subject to local authority 'overview and scrutiny' although there are subtle differences between the two processes in terms of the powers to call witnesses from non-devolved agencies, with the 2015 Welsh Act governing PSBs only applying to 'statutory members' of the board. Cwm Taf PSB, incorporating the statutory community safety responsibilities of its two constituent local authorities is therefore subject to joint PSB/CSP 'overview and scrutiny' arrangements but involving only two councils whereas Gwent will need to consider its relationship with five local authorities.

Having 'too many masters' was another recurring theme among review respondents, with many stating that organisational behaviour – whether within partnerships or independent of them – is largely driven by audit, inspection and scrutiny frameworks. This was described as the principle of 'what gets measured gets done'. Individual agency 'inspections' can result in organisational behaviour being driven in ways that conflict with a partnership ethos and approach, particularly with policy divergences between the UK and Welsh Governments influencing non-devolved and devolved inspection regimes very differently. With the exception of community safety 'overview and scrutiny', which is intended to take an holistic view of partnership working and the contributions of individual agencies, and thematic inspection of youth justice services, there is little in the way of holistic thematic inspection.

The addition of the 'reducing reoffending' to the list of statutory responsibilities for CSP working in 2009 prompted some Home Office experimentation around 'light touch' walk-throughs of partnership offender management arrangements but there has been little since.

4. Citizen Involvement

The *Community Safety in Wales* report identified a significant challenge around the citizen engagement, involvement and participation agenda:

"The complexities of delivery and accountability arrangements are reflected in the findings of our citizens' survey where many respondents are not clear on who is responsible for community safety in Wales. Only 23 per cent of citizens who responded to our public survey stated that they know where to access plans for community safety in their area and only 18 per cent felt that the plans focussed on addressing the most important community-safety issues in their area."

Welsh Government raised concerns at the time about the very small sample size and limited response that informed this conclusion, nevertheless the Auditor General recommended that the 19 PSBs in Wales should take responsibility for improving engagement and communication with citizens in developing plans and priorities for community safety; agreeing priorities for action; and reporting performance and evaluating impact.

CSPs have, since their inception, been required by statute to regularly engage and consult with the community about their priorities, plans and progress toward achieving them. This requirement was strengthened by the Police & Justice Act 2006 which established 'visible and constructive accountability' as one of the 'Hallmarks of Effective Partnerships'. The legislation required CSPs to co-ordinate so-called 'Face The People' sessions together with a minimum of one public meeting of the 'strategy group' each year which had to be attended by senior officials from each responsible authority.

In September 2007 when the Home Office refreshed its guidance to CSPs and introduced the Hallmarks, LSBs were being piloted in Wales and the *Delivering Safer Communities: A guide to effective partnership working* document describes them as: "…Wales's new model for engaging the whole of the Welsh public service in a new way of working, by defining shared outcomes, integrating services, and responding more effectively to citizens' needs."

When the 2011 changes were introduced – removing some of the more prescriptive requirements for CSPs including that of holding at least one strategy group meeting in public – Welsh Government subsequently advised that statutory strategy and planning requirements of CSPs 'should' be discharged via the 'Single Integrated Planning' (SIP) structures being developed via LSBs with a clear message that

streamlining of partnership structures was necessary. In many areas CSP identities
– such as Cardiff's 'Safer Capital' – were lost as they became sub-boards of their
respective LSBs.

The 2012 *Shared Purpose, Shared Delivery* statutory guidance states:

> "With regard to the four statutory plans and strategies to which this guidance
> refers, there is only one statutory partnership, identified as a 'strategy group'
> in regulations made under the Crime and Disorder Act 1998. In practice this
> role is generally fulfilled by the community safety partnerships. It is however
> possible for members of a LSB to fulfil the role of the strategy group, so long
> as the strategy group members identified in the regulations are members of
> the LSB, and they meet with the purpose of discharging the duties of the
> strategy group."

The fact that LSBs were eventually replaced by PSBs might suggest, as the Auditor
General recommended, that citizen engagement and communication now sits within
the PSB remit. However, the review has identified there is a divergence of views
about the nature of PSBs and whether or not community safety is, or should be, a
PSB responsibility. In some areas stand-alone CSPs have been retained while, in
others, the 'CSP' has transitioned into a 'safer' themed board within the PSB
structure. Other areas have taken a hybrid approach, with a separate CSP that has a
reporting mechanism linked to the local PSB. This mixed picture of current
arrangements therefore means the *Community Safety in Wales* recommendation, if
implemented, would not fulfil the statutory requirement in all areas. This
inconsistency of approach also makes it doubly difficult for members of the public to
be clear about who, or what constitutes their 'community safety partnership' and who
or what is responsible for consultation over priorities and plans.

There is a fundamental question to be answered around how important a
'partnership' identity is to the general public – whether a CSP or a PSB with a 'safer'
board – given that since 2011 there is no longer a requirement to have a 'partnership
entity' but simply to work together in partnership and ensure partnership assessment
and planning take place. Research shows limited recognition of CSP logos and
branding, even following extensive marketing and awareness raising activity, with
members of the public identifying more readily with the individual partners within a

CSP – police, council, fire service etc. There is an element of what might be termed 'black box' syndrome, with the citizen not particularly aware or indeed interested in how community safety services are configured or branded and more concerned with the level and effectiveness of service provided at the point of need.

Service user feedback of all varieties almost always highlights the critical issues as: ease of contact (e.g. 'tell us once' approaches, available outside of office hours, well signposted); the ability to raise issues on the first point of contact rather than having to repeat details over and over; and having issues addressed or needs met efficiently and quickly, with feedback provided by the agency particularly where responses are delayed or issues cannot be resolved. CSPs have long wrestled with confusion and complexity around who should lead on responding to complaints of ASB, for instance, with attempts to join up service responses behind a single 'front door' or point of contact such as 101 seeing mixed results. Nevertheless, the focus of community safety partnership working should be on establishing seamless integrated and collaborative services that deliver for the citizen rather than whether or not the citizen understands the complexities of current public sector structures and working practices that underpin a 'CSP' brand.

In the absence of clear understanding among the general public about what a 'CSP' is, what it does and where its responsibilities begin and end, any 'CSP' will struggle to engage more effectively with the communities it serves. Equally, communities themselves are becoming more challenging to clearly identify and define, with increasing emphasis on 'virtual' communities linked by common interest and social media rather than the traditional geographic communities focused around local neighbourhoods and amenities. The individual citizen may well be as concerned about community safety priorities in their work location and where they tend to socialise as they are in their home location – and a different 'CSP' may be responsible for each of these domains with entirely different structures, resources, priorities and ways of operating.

Irrespective of the partnership identity issues, review respondents underlined the importance of better engagement, involvement and participation of communities in the design and provision of effective community safety services, pointing to lessons

from the private sector where failure to engage with 'customers' ultimately leads to business failure and unsuccessful products.

It is too soon to assess whether or not members of the public have a better understanding of who/what a PSB is, however it is evident that, as part of their initial round of well-being assessments, PSBs demonstrated much greater levels of community engagement than their predecessor LSBs – with some adopting quite innovative approaches. *Well-being in Wales: Planning today for a better tomorrow* (Learning from Well-being Assessments 2017) states:

> "Engagement and involvement is clearly an area where PSBs have focused considerable effort, and in some cases, have sought to really understand how local people, including young people, feel about well-being and the future of their communities. However, this isn't a consistent picture. There is the opportunity to build on this through well-being planning, enabling deeper conversations about what should happen in different areas and how to address the tensions this may create. PSBs also need to better understand the way people live their lives and consider more innovative and diverse ways to involve people."

A number of PSBs made greater use of social media and face-to-face outreach activities outside of office hours, utilising community events and opportunities such as street stalls or pop-up stands outside supermarkets or inside GP surgeries. Others invested greater effort in citizens' panels as a means to facilitate ongoing dialogue rather than rely on periodic survey and questionnaire responses. There are risks associated with greater use of social media for community engagement, including key messages being hijacked or undermined by trolling or 'fake news' orchestrated by so-called 'keyboard warriors', and strength of feeling notoriously difficult to assess as quantity does not necessarily equate to endorsement (the number of retweets or followers is not always an indication of support for a viewpoint).

However, as stated above, not all community safety partnership working is incorporated within the PSBs and even those PSBs that assume responsibility for discharging the statutory function are unlikely to have met their statutory requirements around visible and constructive accountability and engagement via the

recent round of well-being assessments, which were designed to inform more generic well-being priorities and plans rather than community safety ones.

This review found that – irrespective of whether or not community safety falls within the remit of a PSB – statutory partners generally fall into the trap of conducting 'too much consultation', with limited examples of mechanisms to provide meaningful feedback to communities (i.e., 'you said, we did'), and failing to develop citizen engagement into more active participation, for instance in decision-making processes, using approaches such as participatory budgeting. Third sector respondents point to a tendency for statutory partners to call them in to support consultation and engagement activity, particularly for so-called 'hard to reach' sectors of society, but the involvement is generally late in the process and still largely built around questionnaire and survey type approaches rather than looking for more meaningful ways of engaging and involving. Third sector partners state that early involvement in co-producing and resourcing community engagement activity would be more likely to prove successful in reaching out to a broader diversity of the population rather than hearing from the 'usual suspects'.

Practitioners, particularly those involved in both community safety and PSB well-being assessments, point to the limited availability of resources and expertise to plan, design and conduct meaningful citizen engagement and the result is a patchwork quilt of sporadic community engagement, often consisting of duplicated and overlapping efforts by different agencies leading to a growing sense of community disengagement with traditional consultation methodologies. Initiatives such as the 'Ask Cardiff' annual survey attempt to overcome the duplication and overlap element and reduce citizen 'consultation fatigue' but are still reliant on survey responses that, according to social science research, provide limited value or insight and stop well short of 'involvement'.

Indeed researchers have long questioned the benefits of conducting 'fear of crime' and other perception surveys as they are not reliable indicators of an individual or a community sense of safety – with those areas experiencing the lowest levels of crime and anti social behaviour often returning the highest levels of fear of crime and vice versa. Studies of traditional community safety engagement mechanisms such as police Partners & Communities Together (PACT) meetings highlight fundamental

flaws with the process, particularly around diversity and inclusivity, and call into question the merits of prioritising police and partner action using this approach. PACT priorities have also been found to be overly influenced by political campaigning and single issue lobbying.

Visible and constructive accountability does, however, rely on effective democratic structures and processes. Local authority 'overview and scrutiny' of CSPs was introduced in 2007 and directly elected PCCs and PCPs were added to the 'performance and accountability' landscape in 2012. The role of Welsh PCCs in driving the performance and effectiveness of community safety partnership working is less than clearly defined within the devolved context. PCCs and CSPs must 'have regard' to each other's priorities and the PCC has the power to call CSP representatives to a meeting to discuss force-wide issues and to request a written report – except in relation to a devolved function. That proviso alone is open to interpretation, particularly in the context of community safety partnership activity in Wales where it is almost impossible to define the line between devolved and non-devolved contributions to community safety from devolved partners.

The review heard that community safety issues often become political 'footballs' that are seen by opposition councillors as opportunities to score points against council cabinet or executive members, or even PCCs themselves. Community safety officers and managers, together with neighbourhood police leads, state there is also a tendency for ward councillors to be viewed as 'problematic' in raising concerns on behalf of their constituents, some of which are deemed to be overtly political, unjustified or unrealistic. Like 'fear of crime' and perception surveys, it is felt there is too much focus on the voices of the 'dissatisfied' or single issue lobbyists and not enough is heard from constituents who are generally content.

Community safety practitioners also question if ward councillors make sufficient efforts to be truly representative and question whether councillors are reaching out to marginalised and often non-voting sections of their ward such as young people engaging in ASB following the loss of council youth services and facilities, chaotic substance misusers who need local treatment services in the face of NIMBYism or BME communities who feel their voices are being ignored. Conversely, there is evidence that councillors – whether representing their respective wards or acting as

cabinet or executive members – actively campaign for improved community safety services and interventions and champion the needs of under-represented and marginalised sections of their communities.

On the positive side, there is evidence that public services are becoming more adept at utilising consultation and engagement based on harnessing citizen 'stories' rather than gathering simplistic questionnaire responses from self-selecting segments of society (e.g. the 'worried well'). Respondents cite greater and more effective use of tools such as Planning for Real, the Kafka Model and SenseMaker which provides richer results in terms of both citizen perception and aspiration. The obvious drawback is these sophisticated methodologies are more time consuming and labour intensive than questionnaires, require a depth of knowledge and understanding of the context, can be more susceptible to subjective interpretation and do not lend themselves easily to quantitative data capture.

Community connectivity and engagement is generally much greater in localities where public services have adopted community 'hub' or one-stop-shop type approaches, often providing co-location with a number of agencies including local charities and community groups. In some cases, partnerships also have the support of neighbourhood wardens or front line service teams with regular and direct contact with local citizens. CSPs that have retained close ties with their regional community cohesion networks also benefit from facilitated access to a broader diversity of local communities – both geographic and virtual 'communities of interest'.

Evidence shows that PCSOs continue to play a significant role in community engagement, seen as a vital source of community intelligence as well as gathering and highlighting community concerns to community safety partners. PCSOs are also often seen as the 'police link' within community safety partnership activity at a very local level, engaging more broadly with local authority responsibilities and functions as well as policing. Whereas some parts of England have seen PCSO numbers cut or even removed, numbers have been maintained in Wales through the direct provision of funding by the Welsh Government, paying for 500 PCSOs across Wales, and by the ongoing commitment from PCCs and Chief Constables.

Invisible Walls Wales – Firefighter for a Day (Case Study)

HMP Parc is a category B men's prison and young offenders Institution in Bridgend, operated by G4S and houses around 1,300 adult male prisoners. In 2013 The Ministry of Justice described the Welsh prisoner re-offending rate as "appalling" with figures showing that a higher than average rate of ex-prisoners commit further offences.

Research has also shown that 60% of boys with a father in prison will go on to serve time in prisons themselves.

Parc was given funding to run its Invisible Walls Wales project, which aims to work with offenders and their families during their sentence and after their release. The project works in partnership with Barnardo's Cymru, Gwalia, Bridgend County Borough Council and the Welsh Centre for Crime & Social Justice.

The project team works closely with prisoners, their families and their children during the custodial sentence and for 6 months post release. They offer support to the whole family through a package of interventions which include parenting and relationship programmes, education, housing advice, physical health and support in moving towards employment.

Parc Supporting Families is a dedicated team of staff and community-based workers who are committed to maintaining and developing relationships with both family and the community. The aim is to provide support, encouragement and guidance to re-integrate prisoners and also encourage them to be effective parents. Every unit provides support via a Family Link Officer.

The Family Intervention Unit at Parc has created a culture which is conducive to successfully engaging and motivating prisoners to progress through the interventions that are set as targets for them. Almost every intervention involves direct working with their children and families and all child and public protection factors and restrictions are adhered to.

The unit has a dedicated 64-bed facility and a new approach to partnership working, with community and statutory services, with charities and other organisations with whom prisons might never normally engage. In June 2016 HM Inspectorate of Prisons declared that children and families work at Parc is 'innovative, radical' and 'probably the best they have seen in the UK'.

Among the interventions utilised since December 2015 is South Wales Fire & Rescue Service's 'Firefighter for a Day' programme, based on the successful programme also run in local communities.

Prisoners and their children are provided with home fire safety and water safety messages and information and also, depending on the age of the children, shown the causes and effects of vehicle accidents and arson, including the impacts on emergency services staff, family, friends and victims. The afternoon session involves fathers and their children engaging in team building and problem solving exercises as well as learning basic firefighting skills.

Since the start of the project, Parc has graduated over 500 men through the Invisible Walls Wales programme, with anecdotal local tracking suggesting that less than a third have returned to custody. The father-and-child bonding time achieved via Firefighter for a Day is seen as critical to changes in prisoner motivation to stop offending behaviour on release as well as greater levels of engagement with the overall programme while inside.

Some key conclusions drawn by the review team from this case study include:

- The importance of building strong connections between prison (and other criminal justice) reducing reoffending programmes and local communities and the wider range of public, private and third sector agencies who can support offenders and their families – both within and beyond the prison walls;
- Positive reinforcement of relationships – both with children and families but also with service providers – as a means of promoting empathy among offenders to better understand the impacts of offending or destructive behaviour and risk-taking on others;
- The strength of utilising positive role models (e.g. uniformed and disciplined service) in service user and wider community engagement.

What Needs to Change?

As identified at the outset, the Crime & Disorder Act is now almost 20 years old. The two decades that have elapsed since it established our shared approach to tackling community safety issues have seen a myriad of changes to the landscape in which statutory partnership working operates.

Our community safety 'timeline' on pages 17 and 18 lists a significant body of amendments to the original England & Wales act that have left practitioners and policy makers unclear at best, and confused at worst, about the current statutory requirements of the much amended primary legislation. Getting to grips with the Act 'as amended' is like trying to piece together a jigsaw puzzle and we have yet to find a 'clean' copy of the Act itself 'as amended', having to rely instead on navigating a maze that starts with:

https://www.legislation.gov.uk/ukpga/1998/37/contents

In conducting this review, the team have themselves faced challenges in interpreting how some of the more recent changes to the Act have fundamentally changed key aspects of both the original and subsequent amendments. Throughout the course of the various engagements we have received numerous inquiries from respondents – many of whom have been involved since the very implementation of the Act – about which aspects remain valid, which have been repealed or superseded.

Does Section 17A of the Police & Justice Act 2006, establishing minimum common data sets and a 'duty' to share such information, still apply? If the statutory requirements of the Act are now being discharged via a PSB, as permitted, is there still a requirement for the community safety 'strategy group' to meet 'in public' at least once a year and, if so, who must attend? While a PCC in England has powers to 'merge' CDRPs in England, and there is reference to the same powers for Welsh PCCs, how would this mechanism actually work in a devolved landscape where some CSPs are actually integral to PSBs?

The Auditor General's 2016 report *Community Safety in Wales* clearly identified that devolution itself has resulted in fundamental structural and policy differences between England and Wales in the application of the 1998 Act, with increased legislative powers of the National Assembly for Wales and a broader remit for Welsh

Government that were not necessarily envisaged by those responsible for turning the Morgan Report into legislation. Specific Welsh legislation such as the VAWDASV Act and Well-being of Future Generations Act now require Welsh CSPs to behave very differently to their English counterparts.

Two decades of continuing evolution for community safety partnership working now add resonance to the once common community safety manager observation that successive Home Office guidance for CDRPs/CSPs would normally include the famous line '…and in Wales it's different'.

This begs the question…is the Crime & Disorder Act 'as amended' still fit for purpose within the Welsh policy and practice landscape in 2018? Or is it time for a refresh, to create a 'clean' version of the Act that will provide the much-needed clarity for community safety partners in Wales, not least around the role of Welsh PCCs?

In establishing the objectives and the scope, Welsh Government stated this review should take account of "whether there is a need for further reform, including the opportunities offered by the Wales Bill." However there is currently no provision for the Assembly to amend primary legislation for England and Wales, particularly while policing and justice remain outside of its legislative competence.

Many respondents to the review believe that most of the identified issues and challenges explored at length in the Auditor General's 2016 report could ultimately be addressed most effectively and efficiently through the devolution of policing and justice to Welsh Government, removing the divergence in practice and approach highlighted throughout *Community Safety in Wales* and creating a seamless join between 'criminal justice' and the much broader world of 'community safety'. The four Welsh PCCs have previously issued a joint statement of their unanimous view that the relationship between the police and devolved bodies (local government, local health bodies, agencies of government and Welsh Government itself) is so important that the devolution of responsibility for policing policy is essential. Both the Commissioners and Chief Constables have stressed the operational importance of working effectively in a devolved environment and using their individual authority to make that effective. They have jointly appointed a Deputy Chief Constable, accountable to the Commissioners and Chief Constables, whose brief includes

collaboration and preparing the ground for the devolution of responsibility for policing.

It is interesting to note that, although the separation of policing and justice in Scotland pre-dates Scottish devolution and the Crime & Disorder Act 1998 no longer applies to Scottish councils, regional health boards or their fire service, the spirit of the Act remains very much alive today and Scottish CSPs continue to oversee local community safety assessments and plans that are now a foundation stone for more integrated community planning arrangements introduced by Scottish Government.

First Minister Carwyn Jones AM has this year announced the establishment of a new Commission on Justice in Wales that will provide an opportunity to undertake a comprehensive review of the justice system and policing in Wales and to consider how the system can achieve better outcomes for Wales. However, it is impossible to pre-empt the findings and conclusions of the new Commission on Justice in Wales, so the Working Together for Safer Communities Review will focus instead on proposals that will realise the opportunities for change and improvement within the current bilateral UK and Welsh Government arrangements and frameworks that pertain to community safety partnership working.

In the absence of full devolution, it is clear from the evidence gathered by the review that a different relationship and strategic approach is required to address the many challenges and issues identified by the Auditor General and Welsh Government therefore needs to take more of a leadership role in the devolved areas related to community safety partnership working. This could even include early dialogue with UK Government about the need for a timely refresh of the 1998 Act to at least recognise the differences brought about by two decades of amendments and devolution and to help provide a greater level of clarity around the range of Welsh community safety stakeholders and their leadership roles, including that of Welsh Government, PCCs, local authorities, HMPPS and Whitehall departments.

The first step in establishing a new and distinct approach to community safety partnership working in Wales is to outline our ambition in a vision statement that will accord with the sustainable development principle, the *Prosperity for All* national strategy for taking the key commitments outlined in the *Taking Wales Forward* Programme for Government and the Prudent Public Services Principles. It will need

to be a strategic vision for community safety in Wales which all organisations involved understand, share and can build into their national, regional and local planning. This has been achieved and has been included at the very start of this report.

In order to drive forward this ambitious new vision in the absence of policing and justice devolution or a refresh of the 1998 Act it will be necessary for Welsh Government to lead the development of Wales' first specific guidance around the expectations of devolved agencies in working together for safer communities in co-operation with non-devolved partners – including PCCs. This guidance will need to build on the sustainable development principle and the Hallmarks of Effective Partnership to create stronger, more effective and more accountable leadership from all agencies and organisations involved and to streamline and simplify governance wherever possible to enhance accountability and refocus activity to avoid duplication and confusion.

This guidance, which could form part of a wider Welsh Government led Safer Communities programme of work, should outline how community safety partners and partnerships can ensure they are:

- Evidence-based and intelligence-led;
- Supported by appropriate skills & knowledge;
- Sustainably resourced and locally appropriate;
- Engaging and involving citizens;
- Preventative and intervening as early as possible;
- Focused on long-term improvements and benefits.

It is clear from the evidence gathered by this review that our approach to engaging and involving citizens in community safety partnership working needs to change, that there are significant barriers and obstacles to the use of what we might term 'business intelligence' and evidence of 'what works' in developing community safety priorities and plans and that public service delivery to improve community safety needs to shift to become more preventative, collaborative and integrated. However Welsh Government cannot achieve this alone and will need a more collaborative and integrated approach to community safety policy and practice development.

This will entail establishing closer and more effective arrangements that support both internal departmental dialogue around cross-cutting community safety themes and issues, and dialogue with UK Government departments responsible for key areas of work – such as the Home Office and Ministry of Justice. It will also involve close co-operation with the WLGA and SOLACE together with others such as PCCs to reinvigorate the WACSO network and replace it with a more inclusive community safety practitioner network for Wales that will support policy and practice development and help to build the 'appropriate skills and knowledge' required to implement the new vision. This network could also take responsibility for the development and ongoing management of Wales' first community safety resources library, as well as supporting or working closely with other related networks to progress improved research and analysis, community engagement, involvement and participation and stronger relationships with third sector providers of community safety services.

Respondents evidence that inspection, audit and scrutiny are all significant drivers of individual organisational behaviour that can obstruct more integrated, collaborative and outcomes focused approaches – particularly when many of the inspection regimes are non-devolved and take limited account of policy and practice divergences between UK and Welsh Governments. There is evidence that more holistic thematic inspection and scrutiny – which required a fundamentally different and outcomes-focused approach – not only supports improvement in multi-agency joint working arrangements but can actually lead to more effective and supportive inspectors, auditors and scrutinisers. It also highlights areas where individual agency 'indicators' or 'targets' – which can become one and the same – are working against shared outcomes and, instead, driving toward unintended consequences such as criminalising young people and mothers who can't pay their TV licenses. There is certainly scope to explore and pilot a more sustainable approach to accountability.

As identified by the Stakeholder Mapping exercise undertaken by the review, it is clear that the current maze of overlapping and duplicative national, regional and local partnership structures with responsibility for delivering safer communities is simply not sustainable. There are also clearly concerns around the impact of a variety of regional footprints at play when the current statutory responsibility for community

safety partnership management rests at a local level, with the chief executive of every local authority. While Welsh Government can consider the effectiveness and duplicity of current regional footprints, and whether or not prescription to establish regional thematic boards helps or hinders, there is certainly an onus on local CSPs and PSBs to fundamentally review their own partnership structures to ensure they remain both necessary and fit for purpose. This requires no guidance or mandate to achieve better streamlining.

The effectiveness of WASPI in facilitating information sharing between community safety partners has been questioned throughout the review, echoing concerns expressed by the Auditor General in 2016. It is therefore recommended that current arrangements should be assessed to ensure they remain effective – particularly in light of 2018 changes to data protection regulations – and that the Wales-wide accord is being applied consistently and effectively where it matters most – with front-line practitioners directly involved in the operation of community safety services.

And, finally, it is not feasible for Welsh Government to significantly increase its investment in community safety services. However, there is scope to modify present community safety and other interdependent funding streams in a way that seeks to provide longer term and more flexible 'outcomes focused' finances to support more holistic, collaborative partnership service planning & commissioning arrangements. These will need to ensure that third sector providers of community safety services are afforded greater levels of parity through more collaborative co-production models and that communities themselves have greater levels of engagement and involvement through elements of participatory budgeting.

The Way Forward

It is proposed to establish a Safer Communities long-term programme of work – in partnership with our devolved and non-devolved partners and stakeholders – to take forward and implement our new ambitious vision for working together for safer communities in Wales:

Our vision is a Wales in which:

» Every community is strong, safe and confident in a manner that provides equality of opportunity and social justice, resilience and sustainability for all;

» The shared responsibility of government, public and third sector agencies is to work together with the communities they serve and the private sector to address activity or behaviour that is unlawful, anti-social, harmful to individuals and society and to the environment;

» Sharing knowledge and ensuring early intervention with prompt, positive action tackles local issues and addresses vulnerabilities.

This vision will be achieved through collaborative and integrated multi-agency activity that is:

☑ **Evidence-based and intelligence-led;**

☑ **Supported by appropriate skills & knowledge;**

☑ **Sustainably resourced and locally appropriate;**

☑ **Engaging and involving citizens;**

☑ **Preventative and intervening as early as possible;**

☑ **Focused on long-term improvements and benefits.**

In order to achieve this, the Welsh Government's Safer Communities programme will:

1. Work with the newly established Justice Commission for Wales in considering how we can do things differently in Wales and identify options to develop a distinct Welsh justice system, which improves people's access to justice,

reduces crime and promotes rehabilitation and is truly representative of Welsh needs.

2. Establish a dialogue with the Home Office to consider the appropriateness of the Crime & Disorder Act 1998 in a way that better reflects Welsh devolution.

3. Develop a different relationship and strategic approach with non-devolved community safety partners that establishes a more effective leadership role for Welsh Government in areas of devolved responsibility related to community safety partnership working.

4. Establish a community safety 'partnership' policy & practice leadership function within the Welsh Government, working in close partnership with the Home Office, Ministry of Justice and other relevant 'devolved' leads for UK Government.

5. Develop new Wales-specific guidance that builds on the sustainable development principle and the Hallmarks of Effective Partnership and outlines how community safety partners and partnerships can ensure they are:
    o Evidence-based and intelligence-led;
    o Supported by appropriate skills & knowledge;
    o Sustainably resourced and locally appropriate;
    o Engaging and involving citizens;
    o Preventative and intervening as early as possible;
    o Focused on long-term improvements and benefits.
Proposed areas for the guidance to cover will include:
• Clarifying expectations around strategic assessment and intelligence-led business approaches, including partnership service planning & commissioning and the sharing of both personal and aggregated data;
• Strengthening the impetus for compliance with the statutory requirements of the Crime & Disorder Act Section 17 'mainstreaming' (closely linked to the sustainability requirements of the Well-being of Future Generations Act);

- Streamlining national, regional and local partnership structures to ensure more effective governance & accountability and clarification of the link to/role of PSBs while still meeting the statutory requirements around CONTEST, Substance Misuse APBs, Reducing Reoffending, VAWDASV, Substance Misuse, Modern Slavery etc.,;

- Ensuring every local authority chief executive in Wales is able to evidence compliance with the Crime & Disorder Act – whether via local or regional partnership arrangements – including provision of a recognised lead function for community safety with the stability and appropriate skills and knowledge to drive forward the Safer Communities agenda within the local and regional partnership context;

- Strengthening the role and status of third sector organisations within community safety partnership working and developing and promoting more effective public sector procurement approaches that minimise the impact of 'marketization' on third sector providers;

- Clarifying the role of elected politicians (including PCCs, local councillors and PCP members) in scrutinising the activities and effectiveness of community safety partnership working;

- Clarifying expectations around citizen engagement and involvement in community safety partnership working and service planning & commissioning.

6. Consider how to establish a new and inclusive national community safety network for Wales, drawing on the Scottish model and building on the foundations established over many years by WACSO, that will support future Welsh community safety policy and practice development and to help to build the 'appropriate skills and knowledge' required to implement the new vision.

7. Consider how to establish an online community safety library and resources database for Wales hosting guidance, toolkits, online learning, effective practice, case studies, research & evaluation, together with re-establishing a specific Welsh programme of community safety learning & development incorporating the various themes identified throughout this document

(partnership problem-solving, intelligence-led business process, analysis, project management & evaluation, commissioning, community engagement, etc.).

8. Explore the opportunities for piloting joint thematic inspection arrangements for community safety partnership working around the 'reducing reoffending' theme with relevant devolved and non devolved audit and inspection regimes.

9. Consider how to improve community safety funding programmes to secure longer term and more flexible 'outcomes focused' funding that supports more holistic, collaborative partnership service planning & commissioning arrangements, including co-production models and participatory budgeting elements.

10. Recommend a cross-governmental review of regional 'footprints' to ensure they are fit-for-purpose.

11. Recommend an assessment of the WASPI arrangements to ensure it remains effective and appropriately applied at a local level.

Glossary

A&E – Accident & Emergency
ABMU – Abertawe Bro Morgannwg University
ACE – Adverse Childhood Experience
AM – Assembly Member
APACS – Assessment of Policing & Community Safety
APB – Area Planning Board
ASB – Anti Social Behaviour
ASBO – Anti Social Behaviour Order
AWCJB – All Wales Criminal Justice Board
AWCSAB – All Wales Community Safety Advisory Board
BME – Black & Minority Ethnic
CCTV – Closed Circuit Television
CDRP – Crime & Disorder Reduction Partnership
CJC – Community Justice Cymru
CoSLA – Convention of Scottish Local Authorities
CRTA – Crime Reduction Tactical Advisor
CSE – Child Sexual Exploitation
CSP – Community Safety Partnership
CTLP – Counter Terrorism Local Profile
DAAT – Drug & Alcohol Action Team
GAIN – Government Agency Intelligence Network
HIMO – House in Multiple Occupation
HMP – Her Majesty's Prison
HMPPS – Her Majesty's Prison & Probation Service
ICPS – International Centre for Policing & Security
ICT – Information & Communications Technology
IOM – Integrated Offender Management
IRAP – Integrated Research Analytics & Performance
LCJB – Local Criminal Justice Board
LHB – Local Health Board
LSB – Local Service Board
LSOA – Lower Super Output Area
MARAC – Multi Agency Risk Assessment Conference
MASH – Multi Agency Safeguarding Hub
NCSN – National Community Safety Network
NHS – National Health Service
NIM – National Intelligence Model
NIMBY – Not In My Backyard
NPT – Neighbourhood Police Team
OCG – Organised Crime Group
PACT – Police/Partners & Communities Together
PCC – Police & Crime Commissioner
PCP – Police & Crime Panel
PCSO – Police Community Support Officer
PHW – Public Health Wales
POP – Problem-Oriented Policing
PPN – Public Protection Notice
PSB – Public Services Board

RICU – Research, Information & Communications Unit
SARA – Scanning, Analysis, Response, Assessment
SCSN – Scottish Community Safety Network
SIP – Single Integrated Partnership/Plan
SOLACE – Society of Local Authority Chief Executives
USW – University of South Wales
VAWDASV – Violence Against Women, Domestic Abuse & Sexual Violence
WACSO – Wales Association of Community Safety Officers
WASPI – Wales Accord for the Sharing of Personal Information
WAST – Welsh Ambulance Service NHS Trust
WLGA – Welsh Local Government Association
YJB – Youth Justice Board
YOT – Youth Offending Team

<p style="text-align:center; color:red">STATEMENT
BY
THE WELSH GOVERNMENT</p>

TITLE Working Together for Safer Communities

DATE 12 December 2017

BY   Alun Davies AM, Cabinet Secretary for Local Government and Public Services

Next year marks the 20th anniversary of the Crime & Disorder Act that put statutory partnership working at the heart of efforts to address community safety issues.

Although the 'partnership' principle of the original Act still holds, today's social, political, economic and environmental conditions in Wales are very different to those in which 'community safety partnerships' were established in the 1990s.

Today's challenges include; a range of new types of crime including modern slavery and hate crime; the escalating threat from international terrorism; the influence of new psychoactive substances and the effects of cyber-enabled offending.

Public service structures in Wales have evolved since 1998 as a result of devolution and there have been numerous changes to the primary legislation itself.

The Auditor General's critical report *Community Safety in Wales* published in October 2016 suggested that Welsh community safety partnerships were not as effective as they should be. It highlighted important issues including the complex and confusing policy landscape in which partners now operate and concerns about leadership and accountability in the delivery of community safety priorities.

However, the report doesn't fully reflect our work to create more sustainable partnership approaches to public services delivery. The recommendations are also unlikely to address the challenges and issues the Auditor General identifies.

Building on previous work, we have now undertaken a comprehensive and wide-ranging review of community safety partnership working in Wales. I am confident this will help us further develop the many successes of the Welsh Government's approach.

In partnership with the Youth Justice Board Cymru we have achieved significant and sustained reductions in the number of first time entrants to the youth justice system. We have halved the number of fire casualties and fires including grass fires set deliberately. Welsh police forces have recruited an additional 500 community support officers paid for by the Welsh Government while many areas in England are losing these valuable community assets. We have introduced ground-breaking legislation to address violence against women, domestic abuse and sexual violence and are leading the way with our pioneering work to address modern slavery.

Announcing the nature and scope of the review in March, the former Cabinet Secretary for Communities and Children, Carl Sargeant, said he wanted the review to be 'ambitious in its thinking' and that the Well-being of Future Generations (Wales) Act gave us an unprecedented opportunity to establish a sustainable approach to safer communities.

I am pleased to say that the review has lived up to his hopes, placing the Sustainable Development Principle at the heart of its approach.

It has involved the widest possible range of stakeholders aided by an Oversight Group with representation from local government, fire and rescue services, Police and Crime Commissioners, the Youth Justice Board Cymru, police chiefs, probation and prison services, the third sector and UK Government departments.

As the review report is being published today, I do not propose to rehearse its conclusions here. I will, however, say that I'm very encouraged by the

over-riding conclusion that, despite the issues and challenges identified by the Auditor General, we have much to be proud of and to build upon in establishing a new and shared vision for Working Together for Safer Communities.

This vision will be achieved through collaborative and integrated multi-agency activity that:

- Is evidence-based and intelligence-led;
- Is supported by appropriate skills & knowledge;
- Is sustainably resourced and matches local needs;
- Engages and involves citizens;
- Takes a preventative approach and intervenes as early as possible;
- Focuses on long-term improvements and benefits.

This is a vision which is underpinned by our Welsh Government ambition to create Prosperity for All.

The Welsh Government is therefore committed to a long-term Safer Communities programme of work – in partnership with our devolved and non-devolved partners and stakeholders – that will:

- Work with the Justice Commission for Wales to consider how we can do things differently in Wales and identify options for the development of a distinct Welsh justice system.
- Develop a different relationship and strategic approach with non-devolved community safety partners, which establishes a more effective community safety leadership role for Welsh Government.
- Establish a community safety 'partnership' policy & practice leadership function within the Welsh Government.
- Develop new Wales-specific guidance that builds on the sustainable development principle and the Hallmarks of Effective Partnership.
- Consider how to establish a new and inclusive national community safety network for Wales to support future Welsh community safety policy and practice development and to help to build the 'appropriate skills and knowledge' required;

- Explore opportunities for piloting joint thematic inspection arrangements for partnership working around the 'reducing reoffending' theme;
- Consider how to improve community safety funding programmes to secure longer term and more flexible 'outcomes focused' funding.

I look forward to working with our many partners and stakeholders – both devolved and non-devolved – in leading this programme to help us achieve our ambitious and sustainable vision for safer communities and prosperity for all across Wales.

Agenda Item 4

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Agenda Item 6

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Agenda Item 7

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