

Agenda – Equality, Local Government and Communities Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date: 8 February 2018

Meeting time: 09.00

For further information contact:

Naomi Stocks

Committee Clerk

0300 200 6565

SeneddCommunities@assembly.wales

Pre-meeting (09:00 – 09:15)

- 1 Introductions, apologies, substitutions and declarations of interest**

- 2 Inquiry into rough sleeping in Wales – evidence session 1**
(09:15 – 10:15) (Pages 1 – 35)
Dr Peter Mackie, Senior Lecturer, School of Geography and Planning, Cardiff University
Professor Suzanne Fitzpatrick, Professor / Director of Institute (ISPHERE), Heriot-Watt University
Break (10.15 – 10.25)

- 3 Inquiry into rough sleeping in Wales – evidence session 2**
(10:25–11:25) (Pages 36 – 82)
Jane Thomas, Assistant Director, Housing & Communities, Cardiff Council
Simon Inkson, Head of Housing, Powys County Council
Julie Francis, Service Manager, Housing, Wrexham Council
Tracy Hague, Temporary Housing Options Lead, Wrexham Council

- 4 Inquiry into rough sleeping in Wales – evidence session 3**
(11.25 – 12.25) (Pages 83 – 107)
Antony Kendall, Director of Operations, The Wallich



Yvonne Connolly, Regional Manager for Wales and the South West, The Salvation Army

Richard Edwards, Chief Executive, The Huggard Centre

Frances Beecher, Chief Executive, Llamau

Lunch (12:25–13:15)

5 Inquiry into rough sleeping in Wales – evidence session 4

(13.15 – 14.15)

(Pages 108 – 140)

Katie Dalton, Director, Cymorth Cymru

Jennie Bibbings, Campaigns Manager, Shelter Cymru

Rebecca Jackson, Policy and Research Officer, Shelter Cymru

Jon Sparkes, Chief Executive, Crisis

Beth Thomas, Regional Sales Manager, Wales & South West, The Big Issue

6 Inquiry into rough sleeping in Wales – evidence session 5

(14.15 – 15.15)

(Pages 141 – 151)

Assistant Chief Constable Jeremy Vaughan, South Wales Police

Chief Superintendent Stephen Jones, South Wales Police

Ian Barrow, Director for the NPS in Wales, HM Prison and Probation Service in Wales

Diana Binding, Lead Senior Manager on Accommodation, Wales Community Rehabilitation Company

Dusty Kennedy, Director, Youth Justice Board Cymru

7 Paper(s) to note

7.1 Letter from the Minister for Housing and Regeneration in relation to rough sleeping in Wales

(Pages 152 – 154)

7.2 Letter from the Chair of the Petitions Committee in relation to rough sleeping in Wales

(Pages 155 – 156)

7.3 Notes of Committee visits in relation to rough sleeping in Wales

(Pages 157 – 165)

- 7.4 Additional information from the Welsh Local Government Association (WLGA) in relation to the Public Services Ombudsman (Wales) Bill**
(Pages 166 – 168)
- 7.5 Letter from the Leader of the House and Chief Whip in relation to human rights in Wales**
(Pages 169 – 176)
- 7.6 Letter from the Chair of the Petitions Committee in relation to fire safety in Wales**
(Pages 177 – 179)
- 8 Motion under Standing Order 17.42 (vi) to resolve to exclude the public from the remainder of the meeting and from items 1, 2 and 3 of the meeting on 14 February 2018**
- 9 Legislative Consent Memorandum: Assaults on Emergency Workers (Offences) Bill – consideration of draft report**
(15.30 – 15.35) (Pages 180 – 181)
- 10 Inquiry into rough sleeping in Wales – consideration of evidence received under items 2, 3, 4, 5 and 6**
(15.15 – 15.30)

Document is Restricted

I welcome the opportunity to inform the ELGC Committee inquiry into homelessness, with a particular focus on rough sleeping. The Housing (Wales) Act 2014 has had a significant positive impact on the assistance offered to many homeless people but it has had limited impact on the lives of rough sleepers – it is right that we should pay particular attention to this subgroup of the wider homeless population. Ending rough sleeping is not an insurmountable problem. In this written statement I have endeavoured to respond to the five main issues identified by the committee.

The effectiveness of Part 2 of the Housing (Wales) Act 2014 in preventing rough sleeping

What is working?

- Statistics consistently show that around 62-64% of households who seek help from local authorities have their homelessness successfully prevented. This is a significant success of the legislation and is a key reason for international interest in the Welsh approach.

What is not working as effectively as it might do?

- Prevention efforts are a little less successful with single people than families – with success rates around 60% compared to 64% (albeit this gap has narrowed). This is important for the current inquiry as single people are more likely to make up our rough sleeper population.
- We might be more successful in preventing homelessness with single people and rough sleepers if local authorities were required to offer a more effective set of prevention interventions (eg. Housing First, swift access to intensive support etc).
- Additionally, we need to recognise that single people are far more likely than families to seek assistance after they have already become homeless – taking away the possibility of prevention. While the data does not allow us to directly support this claim, we know that single people make up 48% of all prevention cases, compared to 70% of all relief cases.
- To further support this concern, research I undertook for Crisis in 2014¹ showed that most single homeless people had experienced three or more homeless experiences before they approached the local authority.
- A key deficiency in the Housing (Wales) Act 2014 is that it only requires local authorities to assist those who seek assistance. It does not require local authorities to proactively identify and assist people at risk of rough sleeping or those who are rough sleeping. Moreover, the duties on other public and private bodies to identify and refer people to local authorities are weak or non-existent. A more proactive approach would increase the number of people assisted at the prevention stage and for those who do end up sleeping rough it would reduce the time spent on the streets.
- Finally, while the Act requires local authorities to take reasonable steps to assist all homeless people, the duty to provide interim accommodation and to ultimately secure accommodation (section 75) is only owed to people in priority need and unintentionally homeless – rough sleepers do not generally pass this hurdle/test.

The scale of rough sleeping in Wales and the adequacy of data

The scale of rough sleeping

- Welsh Government very usefully reintroduced a rough sleeper count in 2014/15 and has published results for the most recent two years of the count: 2015/16 and 2016/17.
- Results were: 240 people in 2015/16 and 313 in 2016/17
- Rates of rough sleeping relative to population size are highest in Wrexham (2.0), followed by Cardiff (1.5). This compares to an average rate of around 1.6 in England (excluding London) and 2.7 in London.

Data adequacy

- The methodology used in Wales includes a two-week data gathering exercise and then a point in time count on a single night. A point in time count is the typical methodology employed in most European countries.
- There are many weaknesses with point in time counts. Two are particularly important. First, it provides a snapshot only – it does not provide any indication of the ‘flow’/total number of people in need of support. Second, it is resource intensive ie. service providers are spending significant time planning and undertaking counts (rather than delivering services).
- There are alternatives and these are currently being explored in Wales – developments are being led by The Wallich. The Combined Homelessness and Information Network (CHAIN) database in London (and several other areas in England) provides a single record of rough sleepers and is populated daily by outreach teams, accommodation projects, day centres etc. The system allows users to share information about work done with rough sleepers and about their needs. However, the system could be improved by a) linking the data with statutory homelessness data and b) making the individual data available for data linkage (eg with health data).

The causes of rough sleeping and of the apparent recent increases in rough sleeping

- In broad terms we know a great deal about the complex causes of homelessness and more specifically rough sleeping. These have been researched fairly widely. My own researchⁱⁱ is amongst a strong evidence base documenting the pathways/journeys people take into rough sleeping – documenting interactions with various state institutions (prisons, hospitals, local authority care), relationship breakdowns, loss of employment, and personal support needs such a substance misuse and mental health issues.
- Additionally, recent research by Suzanne Fitzpatrick and her team on the Crisis Homelessness Monitor Wales has explored the broader structural causes behind changing levels in rough sleeping and homelessness more widely. The Homelessness Monitor concludes that homelessness in almost all Welsh local authorities is perceived to have risen due to post-2010 welfare reform, particularly the extension of the Shared Accommodation Rate of Local Housing Allowance. It is also possible the removal of priority need for homeless prison leavers has had some impact.
- However, the recent visible rise in rough sleeping in Wales is not fully understood. Research being led by Shelter Cymru should help to answer this question.
- Additionally, I would like to add that despite the strong evidence base on causes, there is a need for a more sophisticated examination of the relationship between homelessness and interactions with key institutions such as prisons, care, hospitals etc. This information might inform a more effective set of interventions that prevent homelessness for rough sleepers.

The effectiveness and availability of services including emergency accommodation

In December 2017 I published an international evidence review, documenting what works to end rough sleepingⁱⁱⁱ. The review draws upon over 500 sources and provides a very useful indication of what works and what does not. I draw heavily on this research to inform my views on the key limitations of current services in Wales.

- Unsuitable hostels and shelters: Hostels and Shelters are intended to fulfil an emergency function and they vary substantially in terms of size, client group, type of building, levels and nature of support, behavioural expectations, and nature and enforcement of rules. In relation to larger-scale hostels, with limited support, evidence indicates consistently that homeless people find them unpleasant environments. Significantly, a lack of move on housing stymies the system, preventing hostels from fulfilling their intended emergency or temporary functions and forcing them to operate as longer-term but unsuitable solutions to street homelessness. Unfortunately, this form of intervention continues to play a role in some Welsh towns and cities.
- Unsuitable, absent or inadequate support: Too often, services for rough sleepers, and the wider homeless population, lack adequate and appropriate support. Local authorities are dependent on Supporting People funded services to fund support for rough sleepers – a fund which has no long-term commitment. Moreover, the housing (Wales) Act 2014 does not require local authorities to meet the housing-related support needs of homeless people – therefore many go unsupported. Time limits on support can be particularly problematic.
- Inappropriate/single offer reconnections: The international evidence review conducted for Crisis raises concerns about reconnection policies, employed heavily in the US, England and prominent in Cardiff. Reconnecting an individual with positive social networks outside of the area where they seek help can be a very positive response but

where a reconnection is the single offer, support in the receiving authority is hardly explored, and alternatives within the local authority are not considered, this response can be highly problematic. In Welsh local authorities some rough sleepers are choosing to remain homeless and unsupported, rather than reconnecting to another area.

The steps to prevent and tackle rough sleeping in Wales.

I again draw heavily on the learning from my international evidence review for Crisis, alongside my wider views, to identify key principles of a more effective approach to the prevention and relief of homelessness for rough sleepers.

- **Recognise heterogeneity:** Rough sleepers have different experiences and different support needs. Some will have spent only a short period of time on the streets, with few support needs, whilst others may have entrenched street lifestyles. This means a blanket response/one-size fits all approach will not work. For example, while Housing First may be appropriate for entrenched rough sleepers, a less costly PRS access scheme with less intensive support is likely to be more appropriate for those rough sleepers with fewer individual support needs. The current legislation, at least in principle, embraces this approach.
- **Seek to prevent and relieve:** A key deficiency in the Housing (Wales) Act 2014 is that it only requires local authorities to assist those who seek assistance. This needs to be reversed as many rough sleepers and people at risk of rough sleeping will not seek out services. Local authorities need to proactively identify and assist people at risk of rough sleeping and those who are already rough sleeping. Moreover, other public and private bodies should be expected to identify and refer people to local authorities where there is a housing issue. Using an assertive outreach approach would also help to identify and end homelessness for rough sleepers.
- **Take swift action:** Interventions such as No Second Night Out (NSNO), used widely in London, have highlighted the significant positive impacts of acting swiftly to identify and support rough sleepers. This principle does not underpin current services in Wales. However, swift action alone is not sufficient - this action must be accompanied by an offer of accommodation and support where appropriate.
- **Housing-led:** Unfortunately in Wales, where rough sleepers are assisted into accommodation they tend to follow a staircase model of support, with individuals progressing slowly from temporary to settled accommodation only when deemed 'accommodation ready'. We know there are more effective responses. Having swift access to settled housing has very positive impacts on housing outcomes when compared to the staircase approach. Housing First is particularly effective, most notably with homeless people with complex needs.
- **A duty to provide person-centred support and choice – including cross-sector collaboration and commissioning:** The Housing (Wales) Act 2014 set out to move away from a standardised response to homelessness. Pathway plans were intended to individualise support and incorporate the views and needs of individuals themselves. While we have seen improvement in Wales, local authorities continue to offer a fairly standard response with often limited hand-holding and support. Interventions such as Personalised Budgets, which are based on individually determined support, have proven to be effective at meeting the needs of some of the most entrenched rough sleepers. Support must also be a right. I strongly recommend that consideration is given to the introduction of a 'duty to support' all homeless households. This will be particularly important for rough sleepers and it will almost certainly require actors outside the housing sector (health, social care) to collaborate.
- **A duty to accommodate all:** The Housing (Wales) Act 2014 retains the priority need test. This test should be abolished, therefore entitling all households to settled accommodation. While the abolition of priority need should be a priority, consideration must be given to the entitlements offered to someone found to be in priority need. A person in priority need today would enter a staircase system which we know does not work – it failed many prison leavers previously. Priority need status should entitle households to the sort of support described above ie. much swifter unconditional access to housing with appropriate support.

If these principles are to be embedded in the Welsh response to rough sleeping and we are to overcome the major deficiencies of the current system we are likely to require a further iteration of the Housing (Wales) Act 2014. If we make improvements to the system of services without making these a statutory requirement, rough sleeping will not be ended – changes in political priorities and funding structures will undermine any successes achieved. Furthermore, I reiterate previous recommendations made to the National Assembly for Wales and Welsh Government that it would be highly beneficial to introduce a regulator with sufficient power to hold local authorities to account for their implementation of homelessness duties.

Finally, I take the opportunity to once again recommend the collection and reporting of individual level statutory homelessness and rough sleeping data as it would enable us to answer very many more questions about homelessness and the support provided by local authorities in Wales.

ⁱ Mackie, P.K. and Thomas, I. (2014) Nations Apart? Experiences of single homelessness across Great Britain, Crisis: London

ⁱⁱ Ibid

ⁱⁱⁱ Mackie, P., Johnsen, S. and Wood, J. (2017) Ending rough sleeping: what works? An international evidence review. Crisis: London

Agenda Item 3

Welsh Local Government Association, Llywodraeth Leol a Chymunedau
Equality, Local Government and Communities Committee
ELGC(5)-03-18 Papur 2 / Paper 2

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, the three fire and rescue authorities, and four police authorities are associate members.
2. The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
3. The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.
4. This is the WLGA's submission to the National Assembly for Wales' Equality, Local Government and Communities Committee's inquiry into rough sleeping. The submission is framed around the inquiry's individual terms of reference.

The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping

5. Following the introduction of the Housing (Wales) Act 2014 Local Authorities are required to provide help to secure accommodation to anyone presenting to the local authority who is homeless. This means that more people can now access this help and in particular those rough sleepers who may not have previously been entitled to assistance from the local authority due to their lack of a priority need can now be helped to secure accommodation. Local Authorities work hard to assist those who apply to them for help and the Welsh Government [data](#)¹ shows that the number of applications to LAs has increased significantly since the introduction of the Act. LAs have successfully assisted almost half of those households applying to them for help during the first 2 years of the Act.

¹ <http://gov.wales/docs/statistics/2017/170727-homelessness-2016-17-en.pdf>

6. The Housing (Wales) Act 2014 also puts a duty on LAs to accommodate those who they are helping if there is reason to believe that they fall into one of the ten priority need categories. These categories were widened with the introduction of the Act and the threshold for vulnerability significantly lowered as stipulated in the “Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness”. The use of “interim accommodation” has fallen but this is probably due to the fact that households are getting helped earlier and spending less time in this type of accommodation.
7. Many rough sleepers will be classed as priority need and will be offered “interim accommodation” by the Local Authority. However, it is not unknown for former rough sleepers to be unable to maintain this accommodation due to being unable to adhere to the license conditions. The recent LA questionnaire exercise as part of the Rough Sleeper count 2017 highlighted several occasions where people were sleeping rough having been evicted from hostel accommodation. Potentially there is more than can be done by providers to support people by working with them to retain their accommodation and develop their tenancy skills.

The scale of rough sleeping in Wales and the adequacy of data;

8. Welsh Government has commissioned a consistent one-night count of rough sleepers for the past two years and the latest figures will be released shortly. It is understood that these figures and those from the previous year’s count (2015) show a significant increase in the number of people sleeping rough across the country. There was concern over comparing the 2015 and 2016 figures due to changes in methodology but the common methodology employed in 2016 and 2017 make comparisons between the two most recent counts more reliable and meaningful. It should be borne in mind however that LAs are becoming more proficient at identifying and engaging with people sleeping rough and this will inevitably increase the number of known rough sleepers identified in the area. It is positive progress that LAs are able to identify these individuals in order to provide services and work with people to move them on into settled accommodation.
9. During the rough sleeper count period LAs also carried out a two-week data gathering exercise where services asked those presenting as having slept rough to complete a short questionnaire regarding their housing history and reasons for sleeping rough etc. Local authorities collate and analyse these questionnaires, can compare the cohorts in 2016 and 2017, and use this information to plan, design and provide services for people.

10. The Wallich has recently secured Welsh Government funding to develop a Wales wide data collection system to help agencies to record, share and access data on individuals in order to better understand this cohort. This information system will also help in working with individuals as agencies will be aware of previous input, risk and individual needs.

The causes of rough sleeping and of the apparent recent increases in rough sleeping

11. The causes of rough sleeping are many and varied. From the recent LA questionnaire exercise as part of the Rough Sleeper count 2017 it appears that many people initially become homeless due to losing a tenancy either through relationship breakdown or rent arrears. In these circumstances, it may be the case that the individual affected is a single person with no apparent priority need status, this would mean that the statutory assistance available to them is limited and no temporary accommodation duty would be owed. The individual, who could be a young person or even a care-leaver, may therefore begin sofa surfing and staying with friends and eventually run out of options and end up sleeping rough. The loss of a tenancy can also be caused by, or lead to, mental health and/or substance misuse issues which can remain undiagnosed due to a lack of accesses to relevant services. This can affect a person's ability to sustain suitable accommodation and rough sleeping becomes more likely.
12. Welfare reforms including changes to Housing Benefit rates for single people and smaller families, and the roll out of Universal Credit have affected the income of many. Difficulties with financial management have led to an increase in arrears and affecting households' ability to secure further accommodation due to former tenant arrears and adverse credit records.
13. Among rough sleepers there is a higher proportion of those who have previously been in custody than among the general population. The "National Pathway for Homelessness Services to Children, Young People and Adults in the Secure Estate" which was launched by Welsh Government in December 2015 outlines the way criminal justice, probation services, local housing authorities and support providers should work with people who may be homeless in custody. The Welsh Government research into the success of this pathway will be released shortly. It is our view that the changes to probation services, Transforming Rehabilitation and the introduction of CRCs particularly in the prison setting have caused issues with the successful working of this pathway. The lack of resources within custody

in order to identify and assist individuals who may be homeless means that individuals are often applying to Local Authorities with very little time in which to assist them prior to release.

The effectiveness and availability of services including emergency accommodation

14. All Local Authorities have some services available to assist those who may be sleeping rough. These services will be commissioned and provided based on local needs assessments and evidence from the counts and other information gathering exercises. Some LAs will choose to use B&B accommodation, primarily for single people, whereas others may commission purpose built hostel type provision to accommodate people in an emergency. The use of emergency accommodation will depend on the willingness of the individual to accept the offer and there may be many reasons why a person chooses not to do this e.g. the other individuals already in the accommodation, the ability (or not) to use alcohol or other substances within the accommodation, the perceived risks associated with the accommodation and even the location of the accommodation.
15. The emergency accommodation provided by Local Authorities will sit alongside other offers of support such as assistance with alcohol and/or substance misuse, mental health provision, tenancy and pre-tenancy support services, and finance and debt advice. Many of these services will be commissioned and paid for by the Supporting People Grant Programme. The Flexible Funding Pathfinder pilots recently announced by Welsh Government offer the opportunity to “do things differently” and to reshape services around the needs of some of the most vulnerable people in our communities.

The steps to prevent and tackle rough sleeping in Wales.

16. The Housing (Wales) Act 2014 has enabled LAs to begin working with individuals prior to them becoming homeless in order to sustain current accommodation, or intervene to secure alternative accommodation as soon as people become homeless. This has meant that many individuals have been prevented from becoming street homeless due to this rapid intervention.
17. Representatives from the LA Homelessness Network, Supporting People Network, and specific Local Authorities sit on the Welsh Government’s Rough Sleeper Working Group (RSWG).

18. Several LAs have utilised additional Homelessness Grant Funding from Welsh Government to develop Housing First type services. Many have also used this funding to enhance their services to rough sleepers and provide Rough Sleeper Intervention Teams (sometimes via local providers) to engage with and help those who are sleeping rough in order to mitigate the length of time spent on the streets and assist people back into settled accommodation wherever possible.

 19. There are obviously still many things that can be done in order to prevent and tackle rough sleeping including early education and tenancy skills development, and engagement of other services in identifying triggers which might result in loss of accommodation and rough sleeping. Once an individual begins sleeping rough there needs to be a rapid response in order to get the individual back into accommodation with provision of the relevant services in order to arrest the slide into chronic rough sleeping. Housing First in particular requires health services (particularly mental health) and substance misuse services, in addition to housing services, to be reactive in responding to individuals when they are ready to engage in order to sustain accommodation and achieve positive outcomes.
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Cardiff Council welcomes the opportunity to provide evidence to this inquiry. Detailed below is information on both the prevalence of rough sleeping in Cardiff and the response of the Council and partners to this pressing issue.

[The Steps to Prevent and Tackle Rough Sleeping in Wales](#)

The Cardiff Rough Sleeper Strategy 2017-2020 sets out Cardiff's approach to preventing and tackling rough sleeping over the coming period. The overall vision to 'Work towards ending rough sleeping in Cardiff' is supported by 4 aims:

- To work to understand the causes of rough sleeping;
- To work with partners to ensure support is directed towards ending and not reinforcing rough sleeping;
- To ensure early intervention to prevent rough sleepers becoming entrenched;
- To develop a range of accommodation and support solutions tailored to individual needs.

A monthly update report is produced, detailing progress on key commitments. A copy of the Rough Sleeper Strategy is attached.

[The Effectiveness of Part 2 of the Housing \(Wales\) Act in Preventing Rough Sleeping](#)

The effectiveness of the Housing (Wales) Act in preventing rough sleeping is largely dependent on the success of increased work on wider homelessness prevention undertaken as a result of the legislation.

The Act does however specifically task local authorities to help to secure accommodation for rough sleepers, irrespective of whether they are in priority need. Regardless of duty and both prior to and since the introduction of the Act, Cardiff has sought to accommodate single homeless people via its Single Persons Accommodation Gateway, which coordinates access into hostel spaces and specialist supported accommodation.

All rough sleepers in Cardiff are offered advice and assistance by the Council's Homeless Outreach Team, who have received training on the Housing (Wales) Act. Following a successful pilot, statutory homelessness assessments are being undertaken by Outreach officers where appropriate, offering an equitable service to those unable or unwilling to access the Housing Options Centre.

The Scale of Rough Sleeping in Wales and the Adequacy of Data

National Rough Sleeper Count

The amount of people sleeping rough in Cardiff has approximately doubled since 2014. Figures for the last 3 single night counts show an upward trend in the number of rough sleepers actually observed, with 26 individuals recorded in 2014, 30 in 2015 and 53 in 2016.

Local Monitoring of Rough Sleeping

Daily monitoring of rough sleeping across the city is undertaken by the Council's Homeless Outreach Team and third sector partners. Weekly updates are made to rough sleeping figures and support needs data, providing a comprehensive picture of the current situation and enabling trends and issues to be identified to inform appropriate responses.

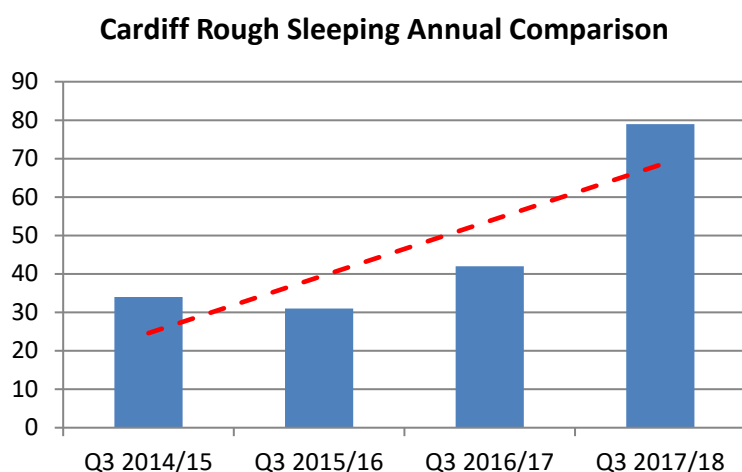
As at 31st December 2017, 79 individuals were recorded as sleeping rough:

- 66 were male and 13 were female
- 30 were under 35 years of age
- 68 were Welsh; 10 English; 1 Scottish; 1 Irish; 1 EEA
- 13 were entrenched (rough sleeping for 6 months or more)
- 53 had a local connection to Cardiff; 10 to other South East Wales authorities; 1 to West Wales; 9 to England; 1 to EEA; 1 to Scotland; 1 to Ireland; 3 were not known.

During December 2017 there were 48 new instances of people sleeping rough.

Outreach services assisted a total of 151 people into accommodation over the period April to December 2017 (against a target of 144 for the full year 2017-18).

The graph below compares average quarterly rough sleeper figures for the last 4 years:



Source: Cardiff Council Homeless Outreach Team.

The Causes of Rough Sleeping and of the Apparent Recent Increases in Rough Sleeping

Complex Needs

Many of Cardiff's rough sleepers have complex needs resulting from negative life experiences / personal lifestyle choices such as substance misuse or criminal behaviour, and often leading to a harmful cycle of multiple exclusions from services.

Of the 79 individuals recorded on 31st December 2017, the following lead support needs were identified:

- Substance Misuse 56
- Mental Health 14
- Alcohol 4

Many rough sleepers have more than one support need.

Local Connection

As Welsh capital, the opportunities offered by Cardiff attract people from neighbouring authorities and elsewhere. Over a quarter of Cardiff's current rough sleepers do not have a local connection to the area for housing purposes and it is recognised that some individuals come to Cardiff because of a lack of provision in other authorities. This figure does vary and has been over 40% in previous counts.

Legislative changes in 2014 restricting EEA migrants' access to income-based Jobseekers Allowance and Housing Benefit had a severe impact on rough sleeping with a high of 18 on the list at any one time in August 2015. Since then, through the development of the Reconnection Service and the EEA Project with the Salvation Army (assisting people back into work) which provided positive intervention to 36 people in 2016 and 2017, the proportion has fallen massively (2 in Cold Weather Provision and 1 sleeping rough in the count shown below).

Local Connection Breakdown, as at 31st December 2017:

- Cardiff - 72%
- Other Welsh LA Areas – 14%
- England – 12%
- EEA – 1%
- Other – 0.5%
- NRPF – 0.5%

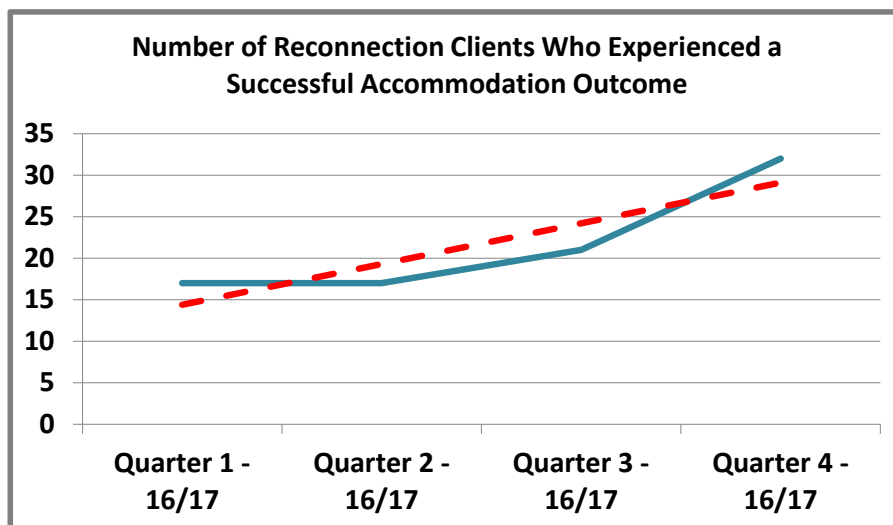
Reconnection Service

The Reconnection Service delivered by the Salvation Army supports rough sleepers with no local connection to return to their home authority in a managed way, or achieve another positive accommodation outcome. The service assists those people from out of county presenting at the Housing Options Service as well as those who are rough sleeping in the city. Service outcomes for April – December 2017 are shown below:

Reconnection Service Outcomes	
Reconnected to Friends and family	28
Reconnected to own Local Authority	32
Move into Private Rented Sector	17
Other Supported Accommodation via Waiver/Reassessment	25

For particularly vulnerable individuals or those with no local connection, Cardiff will give a waiver and allow the person with no local connection into service.

The following graph identifies an upward trend in successful accommodation outcomes:



[The Effectiveness and Availability of Services including Emergency Accommodation](#)

Frontline Services

Cardiff has a comprehensive range of frontline services working with its rough sleepers:

- The Council's Homeless Outreach Team undertakes day-time and evening outreach 7 days a week, engaging with people sleeping rough or who are at risk of sleeping rough. In 2017, the team was expanded and trained to undertake statutory homelessness assessments on the streets. An improved casework management approach has been implemented, working towards No First Night Out for new rough sleepers wanting to access services. Outreach officers offer a comprehensive range of assistance and support including practical help with proof of ID, G.P. access etc.
- The Wallich Rough Sleeper Intervention Team and Solutions Advice Service deliver support 365 days a year, engaging with rough sleepers through the provision of a breakfast run and drop-in facility.
- The Salvation Army Bus Project operates 5 days a week, 52 weeks a year offering rough sleepers access to emergency care and support when they may be excluded from mainstream services.

- The Huggard Day Centre is open 365 days of the year providing support, advice and development expertise to people sleeping rough, alongside free and low cost meals; free clothing; laundry and personal hygiene facilities. An Advocacy Service assists with barriers to accessing accommodation or services. In 2017, the Day Centre worked with 803 individuals who reported that they had been sleeping rough.
- There are also multiple Faith groups and voluntary provision operating in the city.

Amongst the existing individuals who are sleeping rough, 70% are in contact with all services, including the Day Centre. Another 15% are using the alternative drop-in facility at the Wallich and 15% are currently engaging only with services delivered directly on the street (Council Homeless Outreach Team and Salvation Army Bus Project). The main Day Centre service must operate policies that recognise the complex needs of a high proportion of those sleeping rough (as evidenced above), to avoid excluding the very people they are there to work with. However, it is also recognised that there will be people who are reluctant to go there and alternative provision has been made to ensure this does not prevent them accessing appropriate support.

Frontline Accommodation

Frontline accommodation in Cardiff caters for a wide range of client groups including couples and those with complex needs. Current provision includes:

- 45 emergency bed spaces in 5 different locations
- 216 frontline hostel spaces in 5 hostels across the City
- 390 spaces in a range of supported accommodation ranging from high support to lower level support over 21 schemes across the City
- 189 spaces for young people including a dedicated hostel, Northlands
- 54 additional emergency spaces provided over the winter months. This year a further 55 contingency spaces are available for extreme weather events. This provision has been sufficient to meet demand to date.

Move-on and Exclusions from Services

There were 2,313 moves (transfers within and exits from) the Single Persons' Gateway (SPG) between April and December 2017. 1,234 of these moves were for positive or neutral reasons. Examples of positive moves include transitioning to the private rented sector or social housing or less intense support. Neutral moves can refer to transfers to other hostels, whilst negative moves include eviction, abandonment, imprisonment. Of the 1,079 negative exits, 236 were evictions - approximately 10% of all moves.

Of the 203 service users evicted, 23 experienced multiple evictions during this period (17 being evicted twice; 3 evicted 3 times; 2 evicted 4 times and one 5 times). The main reasons for eviction were Aggressive Behaviour (32%); Non Compliance / Engagement (33%); Service charge / Rent Arrears (28%); and Drugs / Substance misuse (6%).

The chaotic lifestyle of this group is evidenced by the fact that between April and December 2017 of those evicted from SPG accommodation:

- 4 had recorded between 30 & 36 previous SPG placements
- 14 had recorded between 20 & 29 previous SPG placements

- 54 had recorded between 10 & 19 previous SPG placements
- 126 had recorded between 1 & 9 previous SPG placements

Work is underway to reduce instances where arrears are the reason for clients leaving accommodation. The YMCA have already amended their arrears policy.

Further work is needed to further address the needs of those falling through the net and a range of innovative / intensive support projects are currently being piloted to assist with this. Further information on these projects is set out later in this report.

The following case studies highlight the challenges and complexities of maintaining accommodation placements:

Case Study A

A 20 year old female known to services for nearly 2 years. Found rough sleeping and street begging after relationship breakdown with parents. Would not engage with Young Persons Gateway, was placed in a POD in Ty Tresillian but later abandoned.

After multiple attempts to place into frontline provision, she was referred to the Rough Sleeper Project in 2016. Since being placed in a flat, although she has maintained her accommodation so far, engagement is still proving to be very difficult, putting the accommodation at risk.

In addition to this she continues to beg in the city centre. Multi-agency involvement, but progress will be a long and protracted process. City Centre begging, especially during event days can be very lucrative.

Case Study B

A male known to Outreach service for several years. Chaotic and heavy drug use has meant that he becomes difficult to place and any time spent in hostels is usually brief. Has a very aggressive nature and will lose his temper very quickly, this also creates barriers to accessing accommodation.

He will frequently be banned from day services due to his aggression. This continuity lapse means that he sleeps rough for long periods at a time. He has been placed 26 times since September 2014, with 14 evictions, removals or no shows.

During this summer, he was referred to a new pilot scheme funded by the local authority, which aims to provide intensive support to people with complex needs. Is still in residence and this placement has now become the longest maintained since he entered our services.

Additional Projects / Initiatives

A number of innovative projects and initiatives have been developed to address identified gaps in provision and meet specific needs. This has increased the choice of provision and the ability to offer tailored solutions.

The Council's **Rough Sleeper Project** offers an alternative accommodation model based on Housing First principles. Direct referrals are made into self-contained accommodation, without preconditions or the need to move through a staged

approach to independent living. Since its establishment, 26 clients who had previously failed to engage or maintain other homeless provision have been positively resettled. The project has been expanded as of August 2017.

Cardiff Solutions Service (The Wallich) expanded with extended operational hours to provide an additional drop facility in an alternative venue to those not accessing other services. 343 individuals have been supported, 110 (32%) of whom requested and have secured accommodation (41 in the private rented sector – with a 90% success rate - and 69 in supported accommodation).

Housing First scheme - A pilot project by the Salvation Army for up to 10 direct placements into permanent tenancies (Council, RSL and PRS) with wrap around support. The pilot commenced in December 2017. To date 2 clients have been rehoused via the project and 2 placements are planned for February 2018. A further 2 clients have been approved by the steering group and are awaiting property matches.

Female Only Accommodation Project - established in September 2017 for women with high support needs and at risk of exploitation currently inappropriately placed in other frontline provision. The Project is delivered by The Wallich and provides 5 bedspaces with 24 hour support, and one to one sessions with the dual diagnosis project worker and in-house psychotherapist. In the first quarter 9 women accessed the service. 78% have achieved increased stability through their support plan with improved engagement with health and support services, and a decrease in drug use, sex working and criminal activity. All residents have registered on the Housing Waiting List, and relationships with family have been re-established for some women.

Complex Needs Project - Referrals for rough sleepers into 4 self-contained units with intensive and specialist substance misuse support started in June 2017. 10 individuals have been supported (as at 31st December 2017) 7 of whom have maintained a tenancy. All individuals supported have benefitted from improved financial wellbeing, with 90% having increased stability in their mental health, and a reduction in criminal activity and street culture activity (such as begging and sex work). 80% also displayed an improvement in physical health.

Extending the number of emergency spaces available and minimising the use of floor space by increasing the number of POD spaces and Night Shelter spaces. This aims to provide clients with safe, dignified personal space.

When redeveloping the Huggard and Ty Tresillian in 2012, 16 POD spaces were created to improve emergency provision and work towards restricting the use of floor space to Cold Weather Provision only. Unfortunately, due to the subsequent steep rise in rough sleeping this has not been possible. The success of these PODS is clearly shown by the 100% retention of service users accessing this accommodation at Ty Tresillian (including hostel move on) compared to a 38% abandonment rate for floor space during the same period. 3 extra PODS have recently been provided at Ty Tresillian, with a further 5 planned, together with 8 at the Huggard.

Similarly, the Night Shelter has a much lower abandonment rate than floor space. This facility has been extended to provide 4 extra spaces (increasing over time to 10).

Day Centre Services - Working to identify and target early intervention opportunities to those accessing the many services at the day centre. The aim is to target support to help people to leave rough sleeping.

Accommodation Gateway – The development of the Single Person Gateway has provided greater flexibility to working with people sleeping rough, providing an increased level of choice to individuals. This includes spaces kept for direct referral from outreach teams and the ability for people to enter accommodation at the level of their choosing within the same time frame as those who do access accommodation sooner i.e. a service user can decide not to use emergency accommodation but to follow a referral route then accept a vacancy in a hostel or other supported accommodation scheme when available.

Addressing begging – A multi-agency task group is being set up with Police and partners and a diversionary pathway away from begging has been drafted. Consideration is given to any vulnerabilities highlighted with people who are begging and referrals made to relevant agencies. An alternative giving campaign – Give DIFFerently has been launched to offer the public a way to support individuals other than giving directly to people who are street begging. Following a soft launch this will be developed and promoted in the near future

Befriending – The Council and third sector organisations are currently working alongside volunteer groups in Cardiff to try to set up a safely managed befriending schemes. Whilst other support services will be put in place as necessary in move-on accommodation, this specifically identifies and aims to address the risk of tenancy failure and repeated homelessness from social isolation.

DRAFT

Cardiff Rough

Sleeper Strategy

2017-2020



Partners to the Cardiff Rough Sleeper Strategy 2017-2020:



South Wales Police
Heddlu De Cymru



HUGGARD, Helping
The Homeless



Connecting rough sleepers to local services
0300 500 0914 www.streetlink.org.uk



Immigration Enforcement

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

Foreword



Along with partners, I am committed to significantly reducing rough sleeping in the city and will continue to bring about effective change. This Strategy aims to ensure that some of the most socially excluded people in Cardiff receive appropriate help and support when they need it most.

Councillor Susan Elsmore

Cabinet Member for Health, Housing & Wellbeing.

Welcome to the Cardiff Rough Sleeper Strategy 2017-20. The strategy recognises and builds on the excellent work that is already taking place to prevent and tackle rough sleeping, but I acknowledge that there are still too many people living on the streets in Cardiff. This document is a response to this issue and outlines the co-ordinated approach required to tackling and preventing rough sleeping in our city.

Sleeping rough is dangerous and can damage people's lives permanently. Life on the streets detrimentally impacts on physical and mental health and wellbeing and at present the average life expectancy of a rough sleeper is just 47 years of age, which is 30 years younger than the general population.

The longer an individual remains on the streets, the more likely that secondary issues such as begging, drugs or alcohol misuse can become an issue. These anti-social behaviours can also impact on citizens, businesses, workers and visitors to the city.

Introduction

This Rough Sleeper Strategy will outline how people sleeping rough, often with complex lives and issues, can receive appropriate and accessible support, advice and homelessness assistance. It identifies what provision is currently available and how it can be improved to deliver a more wraparound service to the most vulnerable in society.

No-one chooses rough sleeping as a permanent lifestyle option. Many people will have held tenancies or been supported in specialist housing but have been unable to sustain or manage accommodation provided. This is often due to complex life experiences such as loss of job, family breakdown, bereavement, periods in care or prison, and serious health issues, or personal lifestyle choices such as substance misuse, criminal behaviour or street culture activities. These issues can often lead to a harmful cycle of multiple exclusions from services.

This document is structured around the 'customer journey' from identifying rough sleepers, engagement with services, provision of accommodation, through to independent living.

The Strategy sets out a number of ambitious activities to be undertaken by the Council and its partners over the next 3 years, listed as 'We Will' commitments throughout the document. These will be collated to inform an action plan to be taken forward and monitored in conjunction with the *Cardiff Housing Strategy 2016-2021*.

Vision

This Strategy has the following ambitious vision:

To work towards ending rough sleeping in Cardiff.

Aims

This Strategy will deliver on the following aims:

To work to understand the causes of rough sleeping.

To work with partners to ensure support is directed towards ending and not reinforcing rough sleeping.

To ensure early intervention to prevent rough sleepers becoming entrenched.

To develop a range of accommodation and support solutions tailored to individual needs.

Background

Housing Issues in Cardiff

Cardiff Council and partners are facing unprecedented pressures to deliver accommodation options to those in the most housing need. These pressures come from reducing resources, high levels of homelessness, Welfare Reforms and a deceleration of housing development. The *Cardiff Housing Strategy 2016-2021* shows that:

- ⇒ There are nearly **8,300** households on the waiting list for social housing, of which 8% are homeless;
- ⇒ There are **450** new housing applications each month;
- ⇒ **2,700** families are living in severely overcrowded homes;
- ⇒ **600** homeless households are living in temporary accommodation or hostels including **378** families.

The Welsh Government provides Supporting People grant funding to assist vulnerable people to live independently and prevent homelessness. The Council administers the funds and commissions services such as hostels, refuges, supported housing schemes and tenancy support.

As both the capital and largest city in Wales, Cardiff experiences a high rate of homelessness. At the acute end, Cardiff has seen year on year increases in the number of rough sleepers.

- ⇒ Single night counts undertaken in London in 2016 recorded **964** rough sleepers, **23%** of the English national figure of **4,134**. Cardiff's 2016 single night count recorded **53** rough sleepers, representing **38%** of the Welsh total of **141**.
- ⇒ At **53** rough sleepers, Cardiff's 2016 single night count figure compares with areas such as Birmingham (**55**) and Bedford (**59**), but is not as high as Bristol (**74**) or Manchester (**78**). *Source: Rough Sleeping Statistics Autumn 2016, England (Dept for Communities & Local Government, 2017); National Rough Sleeper Count, November 2016 (Statistics for Wales, 2017).*

The challenge in taking forward services to rough sleepers and vulnerable people is to ensure consistent advice is given, that an awareness of all the services available is widespread and that collaboration is promoted wherever possible.



Background

Homeless Duties to Single Adults

New homelessness legislation was implemented on 28th April 2015 through Part 2 of the Housing (Wales) Act 2014. This Act places new duties on local authorities to help anyone seeking housing advice and assistance. The specific duties are:

Duty to Provide Advice and Assistance:

The Council has a duty to provide advice and assistance to anyone including persons from abroad. For rough sleepers this includes outlining the various accommodation options available, as well as support to access relevant benefits.

Duty to Prevent Homelessness:

The Council is required to work with eligible clients to try and prevent homelessness or secure alternative accommodation. For rough sleepers this may include facilitating mediation with family members or addressing issues such as rent arrears.

Duty to Help to Secure Accommodation:

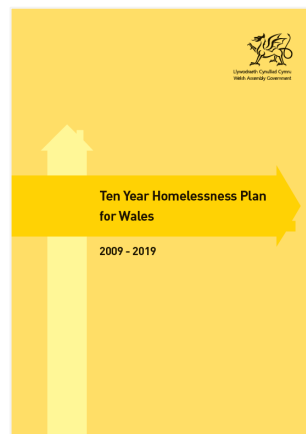
Where homelessness cannot be prevented, the Council must assist all eligible households to find suitable alternative accommodation. This may include assisting access into the private rented sector, or supported housing for those deemed vulnerable, as defined by the legislation.

Duty to Secure Accommodation:

Where alternative accommodation has not been found under the previous duties, most single people without dependents would fail to qualify under this duty, again unless they were deemed vulnerable. While the Council has no duty to provide it, Cardiff has access to a range of accommodation for single people (see page 22).

Although the wider duties do assist the majority of single homeless people, rough sleepers are not directly addressed within the Housing (Wales) Act 2014.

However, Part 2 of the Act places a duty on local authorities to carry out local homelessness reviews and formulate local strategies. This includes an expectation for a specific strategic focus on rough sleeping. An action has been included in the *Cardiff Housing Strategy 2016-2021* to develop a Homelessness Strategy by June 2018. This Rough Sleeper Strategy has been developed first to address the pressing issue of rough sleeping in Cardiff.



The Welsh Government *Ten Year Homelessness Plan for Wales 2009-2019*, identifies 5 key objectives that have helped to shape this Rough Sleeper Strategy:

- ⇒ Preventing homelessness wherever possible;
- ⇒ Working across organisational boundaries;
- ⇒ Placing the service user at the centre of service delivery;
- ⇒ Ensuring social inclusion and equality of access to services;
- ⇒ Making the best use of resources.

Background

Research

A number of research studies have been undertaken looking into the reasons for rough sleeping; the support needs of these individuals and experiences of violence and abuse on the streets.

The 2011 Joseph Rowntree Foundation report 'Tackling Homelessness and Exclusion—Understanding Complex Lives' explores the interaction between homelessness and other social issues. Evidence was collected by research projects in 7 UK cities, including Cardiff. The report identifies:

- A strong overlap between more extreme forms of homelessness and other support needs, with nearly half of service users reporting experience of institutional care, substance misuse and street activities such as begging, as well as homelessness.
- People with complex needs are at serious risk of falling through the cracks in service provision. There needs to be an integrated response across health, housing and social care.
- A need to move from compartmentalised and organisationally driven approaches towards an individualised approach.

In 2016, Dr Peter Mackie of Cardiff University undertook research on 'Transitory Single Homelessness in Wales'. This study looked at the scale of movement of single homeless people, where they were coming from and the influences behind people seeking housing assistance in areas where they have no local connection.

Examples of the range of factors identified:

Push - loss of employment, transient lifestyle, relationship breakdown.

Pull - know someone in the area, a fresh start, belief that coming to the city would offer more services.

The 2016 Crisis study 'It's no life at all – Rough Sleepers' experiences of violence and abuse on the streets of England & Wales' conducted face to face interviews with 458 homeless people who had experienced rough sleeping in the previous 12 months. Focussing on the extent and impact of incidences of crime and anti-social behaviour, the report identified that:

- 77% were victims of anti-social behaviour
- 30% had experienced violence;
- 6% had been sexually assaulted;
- 45% had been intimidated or threatened with violence / force;
- 56% had been verbally abused;
- 51% reported damage to / theft of personal property.

The Wallich are currently undertaking consultation with existing and former rough sleepers in Cardiff, to identify the barriers they experienced when accessing accommodation and support services. The outcomes of this consultation will be considered by the Council to review pathways into services as necessary.

We Will:

- Continue to benchmark with other local authorities to review and adopt relevant best practice.
- Consider the findings of relevant research and pilot projects to inform future service provision.

Identifying Rough Sleepers

Reporting Rough Sleepers

The Council welcomes referrals from the public and professionals who have information or concerns about anyone they believe to be sleeping rough anywhere in the city. Dedicated contact options for the Homeless Outreach Team are advertised on the Council website (www.cardiff.gov.uk/homelessnow), including a direct e-mail address (roughsleeping@cardiff.gov.uk). This referral route has proved effective in identifying previously unknown clients and/or locations.

Another option is the Streetlink Cymru service. This website and mobile phone app allows the public to report the location of a presumed rough sleeper to a central service. The information is then passed to the relevant Council who investigate and visit the location within 3 working days.

Unfortunately, not all referrals received contain sufficient detail to act upon the intelligence. Since its launch, Cardiff has received 401 referrals via Streetlink Cymru, of which only 2 have provided information on rough sleepers previously unknown to the Homeless Outreach Team.

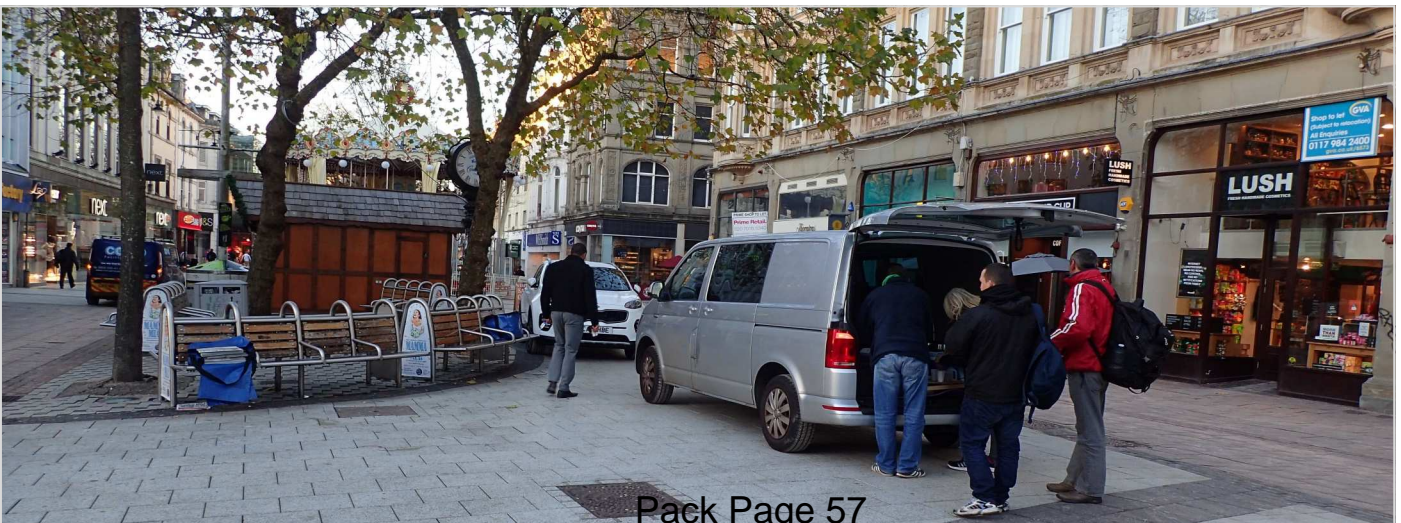
We Will: Improve the visibility of the Homeless Outreach Team's contact details on the Council website.

Ongoing Monitoring

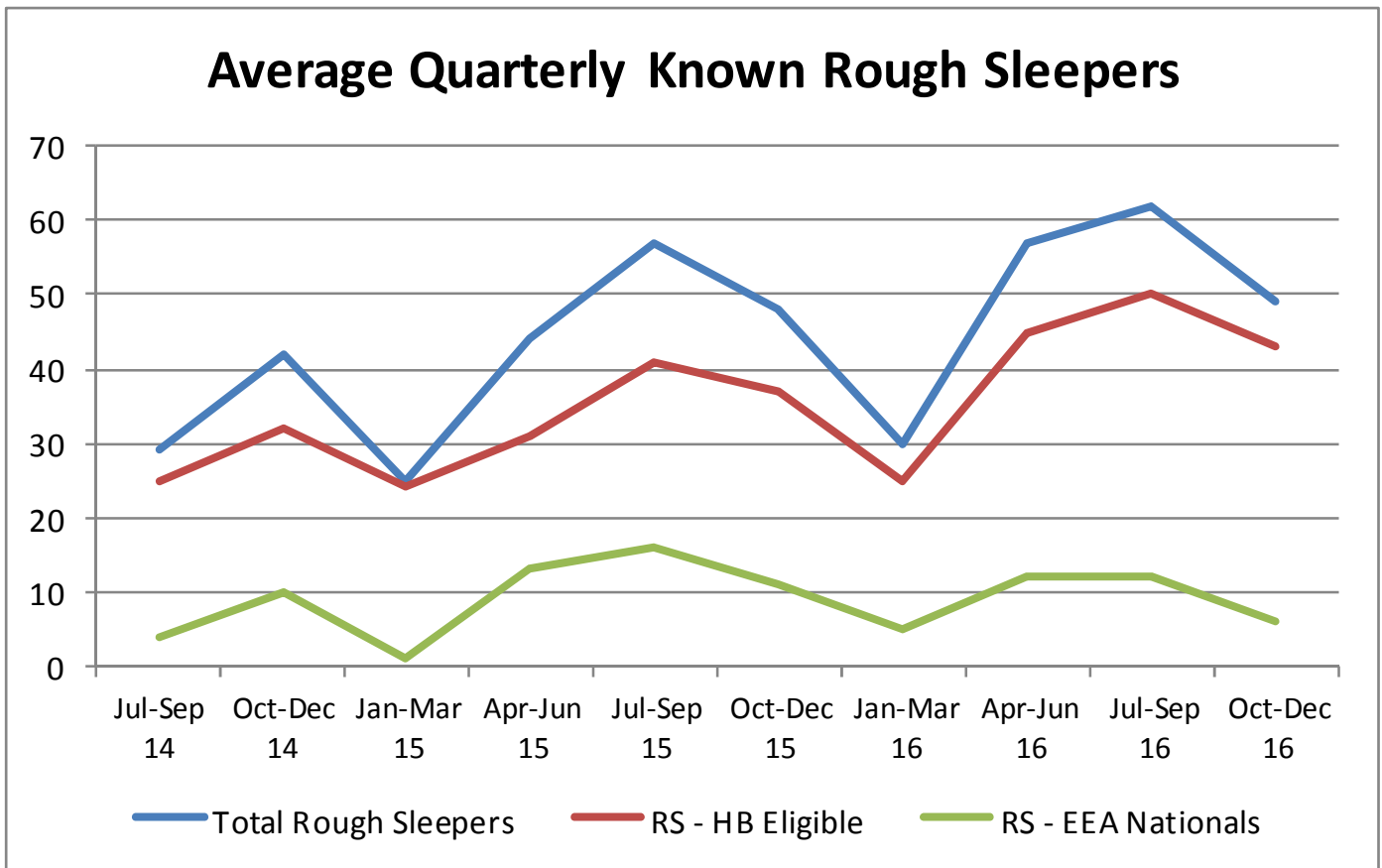
The Council's Homeless Outreach Team work alongside a variety of third sector organisations to seek out and support rough sleepers. Together with staff from The Wallich, Council outreach staff take breakfast to and engage with rough sleepers every morning at known locations.

Details of all individuals observed are recorded and data is combined with information from partners. Along with intelligence from the Police and other sources, this data builds up a picture of rough sleepers.

This daily monitoring shows that over the last 2 years, the number of people sleeping rough in and around the city centre has steadily increased. During one week in August 2016 this figure peaked at 68 individuals, with the whole of August averaging 60 individuals per week, the highest numbers ever recorded in Cardiff.



Identifying Rough Sleepers



Source: Cardiff Council Homeless Outreach Team 2017.

The graph demonstrates the changing trend of rough sleeping over the past 2 years. It shows seasonal fluctuations, with numbers decreasing in the winter months in line with Cold Weather Provision (see page 21). However, the overall trend is an upward one, with the exception of a levelling off of European Economic Area (EEA) nationals sleeping out since April 2016.

Client Demographics

As at 28th October 2016 there were 52 known individuals sleeping rough:

- 46 were males and 6 females;
- Almost half (25) were aged under 35;
- 37 were White Welsh; 3 White British; 1 White Irish; 1 Mixed Race and 10 were EEA nationals;
- A third (17) were classed as entrenched (see page 11);

- 26 people had a local connection to Cardiff; 11 to other South East Wales authorities; 3 to England; 10 to EEA countries; 2 were not known. Source: Cardiff Council Homeless Outreach Team 2016.

This snapshot includes classifications of rough sleepers, as described below.

Those New to Sleeping Rough

As the Welsh capital, Cardiff attracts many people wanting a new start. However, when jobs and housing are not as readily available as anticipated, some find the only option is to sleep rough. Similarly those already resident here who experience a significant life-changing event such as job loss or relationship breakdown with partner or parents, also may find themselves on the streets. With early identification these individuals can be supported and avoid the often harmful cycle of homelessness.

Identifying Rough Sleepers

The Outreach Team aim to identify and engage with new rough sleepers on the same day and respond to all other referrals within a target of 3 days. Anyone wanting to access services will have immediate access to emergency bedspaces.

Long Term Rough Sleepers

Whilst efforts are made to get people into accommodation at the earliest opportunity, due to a variety of reasons, a significant proportion of people sleeping rough do not engage with services. Whilst contact with most clients will result in positive change over time, there are still many individuals who have additional barriers and personal circumstances that can lead to a longer term problem. Chaotic lifestyles and complex needs can result in an inability to maintain accommodation once provided, or failure to maintain any form of accommodation for extended periods of time. For the purpose of this strategy, the group is split into two different categories:

Periodic Rough Sleepers:

Clients who have 3 separate periods of rough sleeping. Such clients have multiple spells of rough sleeping and are recognised as being at high risk of becoming entrenched.

Entrenched Rough Sleepers:

Clients who have been rough sleeping for 6 months or more. Currently, this applies to approximately a third of rough sleepers in Cardiff. Although entrenched, efforts continue to be made to engage and encourage people into services.

Case Study: Entrenched Rough Sleeper

PJ was last accommodated in a hostel, which he abandoned as he found it too chaotic. He has slept rough ever since, a period of approximately 12 years. PJ has been made many offers of housing during this time, but has declined them all.

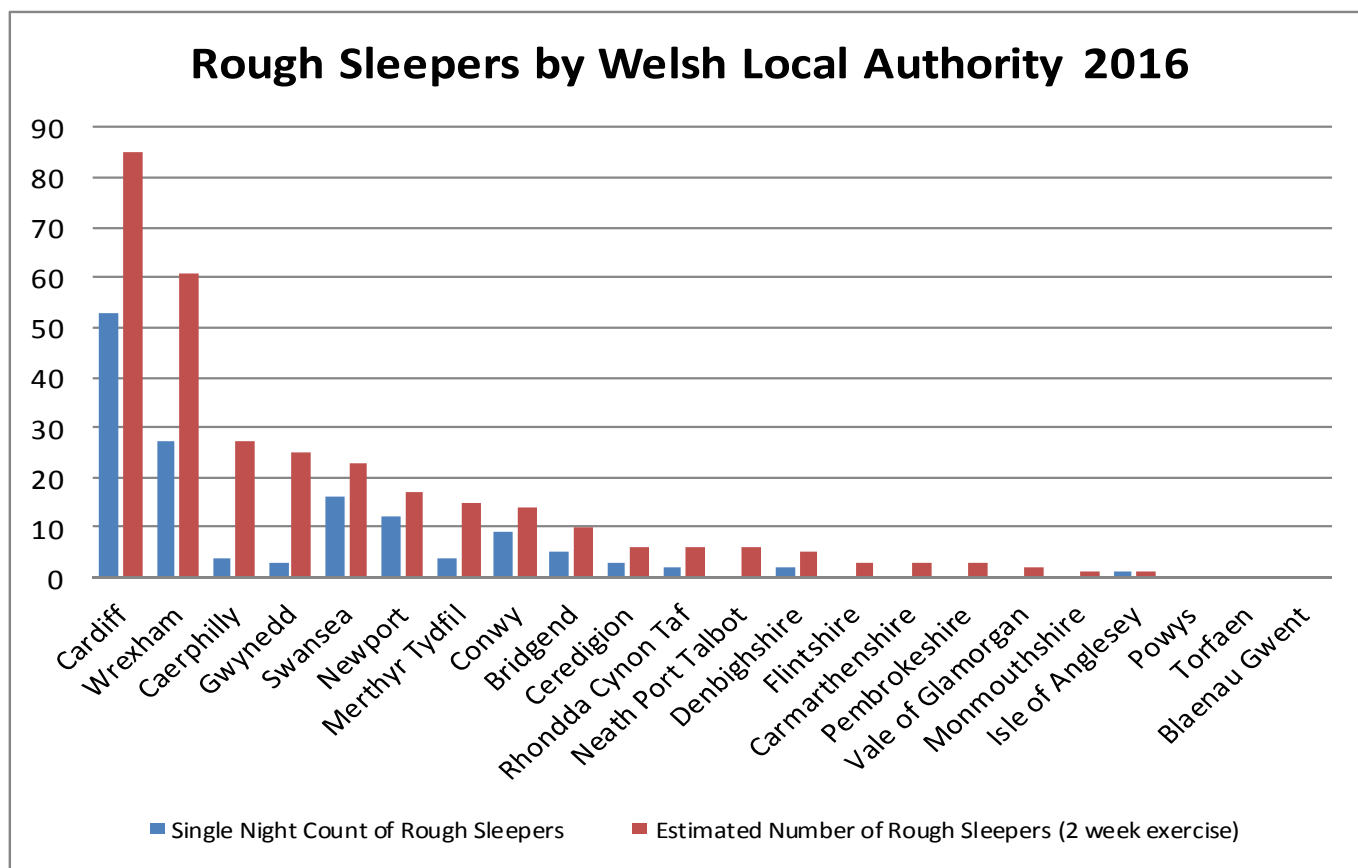
The Outreach Team continually remind PJ that he has options open to him but he gets easily annoyed if he feels pushed. The priority has to be to maintain a supportive, trusting relationship with him in order to keep him as safe and well as possible.

The Outreach Team assisted PJ to make claims for welfare benefits so he can now support himself with food and hot drinks through the day without having to access soup runs. PJ lives a very insular life; this is the way he copes with the mental health issues at the root of his street homeless lifestyle. PJ continues to be monitored for any signs of diminished mental capacity around his decision to live on the streets.

European Economic Area (EEA) Nationals

Due to a change in legislation in January 2014, many single EEA nationals without worker status or recourse to public funds sleep on the city's streets. When Cold Weather Provision (see page 21) is not available, they comprise around 20% of all rough sleepers. These clients are still supported by the Homeless Outreach Team, however, their accommodation options are limited due to ineligibility for Housing Benefit and lack of employment.

Identifying Rough Sleepers



Source: National Rough Sleeper Count, November 2016 (Statistics for Wales, 2017).

Veterans

The Council is a signatory of the Armed Forces Covenant. Homeless assessment and outreach processes have been developed to identify those who present from the Armed Forces and ensure they are signposted to appropriate support.

Annual Count

The Welsh Government requires local authorities to regularly report on the scale of rough sleeping in their area to inform national responses to this issue. A date is identified each year and, following set guidance, local authorities undertake a count of individuals sleeping rough during that night. This is supplemented with a two-week exercise to estimate numbers from all intelligence available.

The graph above shows the results of the 2016 Wales-wide count. Based on the estimated number of people sleeping rough over the *2 week period*, Cardiff was one of only four Welsh local authorities with a rate of over 2.0 rough sleepers per 10,000 households, compared to the Wales average of 1.0.

Cardiff's figures for the last 3 *single night counts* show an upward trend in the number of rough sleepers actually observed, with 26 individuals recorded in 2014, 30 in 2015 and 53 in 2016.

Early Intervention Options

Cardiff has a wide variety of services delivered by the Council, third sector and voluntary organisations operating in the city, which support vulnerable people and those affected by homelessness. There is a need to better coordinate and focus these services on early identification of rough sleepers and taking timely and appropriate action to help people off the streets.

The Outreach Team works throughout the city with other outreach agencies, providing assistance to access accommodation options and services such as Health (both physical and mental) and Social Care where an issue is identified needing intervention. Although data is shared between services, an improved approach is required to fully record the interactions and offers of support made to individuals.

The Homeless Outreach Team

The Council's Homeless Outreach Team goes out daily between 6am and 9pm to engage with people who are currently, or who are at risk of becoming, rough sleepers. The 'Guide for homeless people in Cardiff' is given to all those encountered. Due to the nature of many clients, engagement can be difficult and requires perseverance from staff to connect with and support the client.

We Will:

- Expand the Outreach Team to provide a case management approach to rough sleepers.
- Improve data sharing between agencies involved with rough sleepers.
- Work towards 'No First Night Out' for those who engage with services.

Guide for homeless people in Cardiff

<p>› HANR Outreach Services</p> <p>(Advice and services for homeless and vulnerable adults). Housing Options Centre (HOC), Hansen Street, Cardiff, CF10 5DW</p> <p>Freephone: 0808 100 1327</p>	<p>› Breakfast Run</p> <p>Daily service from 7am checking known sites in & around Cardiff. Based at the Old Museum toilets, Museum Avenue from 8.15am</p>	<p>› The Bus Project - Museum</p> <p>Sunday 5.30 – 8.00pm Monday – Thursday, 6.30 - 9.00pm</p>	<p>› The Soup Run</p> <p>Every evening from 8pm, Charles Street (rear of M&S)</p>	<p>› Street Pastors</p> <p>Every Friday & Saturday night from 10pm - 4am in the City Centre.</p>
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Early Intervention Options

Third Sector Services

The following third sector services are grant funded by the Welsh Government and the Council and work closely with the Homeless Outreach Team.

Rough Sleeper Intervention Team

This service, operated by The Wallich in partnership with the Council's Homeless Outreach Team, is more commonly known as the 'Breakfast Run'. Staff go out each morning to engage with rough sleepers through the provision of breakfast and other welfare items.

Bus Project

Established in 2002, this service is delivered by the Salvation Army, Sunday to Thursday evenings every week. As well as access to out of hours emergency accommodation, this service also provides food, access to advice, advocacy, medical support including needle exchange and chaplaincy. The Bridge Project substance misuse outreach worker provides a surgery via the Bus Project and links in with all other outreach services.



Huggard Day Centre

The facility provides an open access day centre for rough sleepers 365 days a year

where they can access a variety of advice and support, from basic welfare provision to diversionary activities and access to training and development. Services include:

- Reception Service: Meeting the immediate and basic needs of clients, supporting them to engage with accommodation and support services;
- Support and Rehabilitation: Addressing barriers to engagement and breaking dependence on street culture activities. Providing diversionary and development opportunities;
- Development and Training: Developing confidence, social skills and employability in an attempt to break the cycle of homelessness through an extensive range of activities and training.

The Huggard Day Centre has an Advocacy Service which provides a direct access drop-in to deal with any issue a homeless or vulnerably housed person may present with. The advocate works closely with partner agencies and regularly receives referrals where specific support needs have been identified that can be a barrier to accessing accommodation or services, such as complicated benefit claims.

The Centre also provides a Substance Misuse Project for rough sleepers that follows a harm reduction programme. This service provides low threshold, open access support from the provision of a needle exchange service to advice, support, stabilisation and engagement in formal treatment services.

Early Intervention Options



Voluntary Provision

There is also a range of voluntary and non-grant funded assistance available in Cardiff.

Faith Groups

There is a long history of faith groups providing 'soup runs' for rough sleepers in the city, taking turns to give out hot food on weekday evenings. The services provided by faith groups have increased significantly in recent years to include approximately 12 cold weather beds in churches over the winter months, food parcels, free clothing, haircuts and personal hygiene products.

Street Pastors

Cardiff Street Pastors initiative is delivered by local churches, working with the Police, the Council, Health and local businesses. Street Pastors are volunteers, trained to prevent anti-social incidents and support people to access services or transport. Cardiff Street Pastors recognise many of the entrenched rough sleepers and will offer blankets and signpost them to services.

Community Initiatives

A range of different community-based initiatives provide services and assistance to rough sleepers, often on an ad-hoc basis.

Homeless Alliance

The Homeless Alliance was formed in 2013 to try to coordinate these services alongside statutory and other partners.

Working Together to Get People Off the Streets

There is clearly a wealth of services assisting rough sleepers. However this activity needs to be refocussed and better coordinated. A new approach is needed to divert people away from options which encourage dependency and reinforce rough sleeping, and to realign services towards helping people to achieve the confidence required to live independently.

More can be done to further integrate current provision, using partners' respective specialisms to support homeless people. For example, Faith groups may be best placed to befriend individuals on a 1-1 basis to divert them into activities, employment and socialising. A more intensive, wraparound and collaborative approach to supporting rough sleepers, especially new individuals, to move off the streets, will improve the likelihood that they are diverted from a harmful lifestyle and achieve better outcomes.

We Will:

- Strengthen the joint-working response, coordinating and refocusing all partners' efforts on getting people off the streets.
- Develop procedures for closer partnership working with Faith groups.
- Explore options to develop diversionary / befriending services.

Early Intervention Options

Complex Needs

The majority of entrenched and repeating rough sleepers that are being supported within the city are not homeless because they do not have a roof over their head, but because they have repeatedly been unable to sustain or manage accommodation provided.

The Council and its partner agencies have recognised an increase in the number of presentations where the lead need is identified as mental health. A significant number of these presentations also have coexisting substance misuse related needs.

Partners acknowledge the need to ensure that mental health and substance misuse support within hostel provision meets the needs of the client, and that appropriate placements are made for the level of support required. A joint review of the current provision and pathway is currently underway between the Council's Housing and Social Care Services working with Health colleagues. Two specialist mental health professionals have been engaged to undertake the review. This will include:

- Use of an improved support needs assessment to ensure identified support needs are met.
- An in-depth analysis of what support is actually offered in hostels and supported housing schemes.
- Devising criteria to improve matching of client need with appropriate placement.
- To act as specialist advisors to staff to assist with referrals.
- To identify gaps in existing accommodation provision.

This review will inform future provision and develop a clear pathway for individuals with discrete needs.

Case Study: Substance Misuse Joint Outreach Pilot

During October 2016, the Council's Homeless Outreach Team undertook 4 sessions (one per week) of street-based joint outreach with TAITH. TAITH are commissioned by the Substance Misuse Area Planning Board (APB) using Welsh Government grant funding to offer advice and support to help people make informed decisions regarding their substance use. Services include harm reduction strategies; one-to-one interventions; semi-structured group work; needle exchange and blood borne virus testing. The pilot resulted in:

- 10 Entry to Drug and Alcohol Services (EDAS) referrals;
- 3 direct access EDAS appointments;
- 12 clients being signposted to TAITH.

We Will:

- Develop a support pathway through services for clients with mental health/substance misuse issues.
- Review and improve partnership working between the statutory and voluntary sectors to address complex needs.
- Build upon the success of the substance misuse pilot and explore further options for joint outreach with specialist partner agencies.
- Develop a specialist pathway through services for females at high risk of exploitation.

Early Intervention Options

Vulnerable Persons Multi-Agency Intervention

In collaboration with partners, the Council has developed a range of intervention procedures for individuals where there is heightened concern relating to their safety and wellbeing. These procedures are implemented through a referral process which triggers a multi-agency response. An action plan is agreed to put in place appropriate interventions until an acceptable outcome has been reached. Issues can be escalated to senior management within each partner organisation where a situation and the potential consequences are deemed critical. There are 4 stages to this pathway:

Stage 1: Access Panel – multi-agency meeting to discuss all clients referred due to exclusion from frontline accommodation.

Stage 2: Falling Through the Net – multi-agency meeting to discuss an individual's concerns and risk.

Stage 3: Accelerated - expedite consultation with senior management where the need is identified.

Stage 4: Blue Light – provide emergency intervention where it is assessed that a person's circumstances pose a serious and immediate life threatening risk.

To improve early intervention, the criteria for these procedures need to be strengthened. Whilst referrals into the service can be made at any time, they will automatically be made for all those at risk of long term rough sleeping.

We Will: Further develop the multi-agency procedures to identify and intervene with those who sleep rough on 3 separate occasions, or continuously sleep rough for 3 months.

Health and Social Care Services

It is widely accepted that rough sleeping significantly impacts on individuals' physical and mental well being. In Cardiff, the following well-established services work with outreach services and accommodation providers to help address the needs of the most vulnerable in society:

Homelessness Nurse

The homelessness nurse provides healthcare intervention via the medical suite at the Council's Housing Options Centre and in hostels. As well as offering treatment and services such as sexual health and blood-borne virus screening, referrals are made to specialist services, such as dentistry, as required.

Cardiff Alcohol Treatment Centre

The Alcohol Treatment Centre is a nurse-led service based in the city centre, which assesses, treats and monitors intoxicated individuals. The centre was developed through a broad partnership including Health, the Police and the Council.

Mental Health Assertive Outreach Team

The team assists individuals and professionals to overcome barriers to assessment and treatment for vulnerable adults with complex needs.

Early Intervention Options

City Centre Social Work Team

This team works with vulnerable homeless individuals with social care needs and/or complex health needs, including a small number of service users with no identifiable accommodation move-on option. The team engage with service users to work towards completing an Integrated Assessment and provide interventions based on need and appropriate packages of care.

The Bridge Programme

The Bridge Programme is a unique service designed to provide access into substance misuse treatment for marginalised and hard to reach clients. With integrated specialist outreach workers, the programme offers rapid access to a wide range of treatment options including brief interventions, assessment and structured treatments. It also provides support to access hostel accommodation; Naloxone; blood borne virus screening and needle exchange.

The programme offers on average 50 plus treatment places a year. Approximately 80% of service users have either been directly engaged from rough sleeping or have had experience of rough sleeping within the last 12 months.

Reconnection Service

Cardiff recognises that not all rough sleepers will have a local connection to the area for housing purposes and that some individuals come to Cardiff because of a lack of provision in other authorities. All rough sleepers in Cardiff are given advice and assistance regardless of their local connection status.

However, monitoring of the impact of the new legislation indicated that, in 2015 the number of people sleeping rough or accessing emergency accommodation in Cardiff, who were from other Welsh local authority areas, was increasing. This led to the development of the Reconnection Service delivered by the Salvation Army to support individuals with no local connection to return to their home authority in a managed way, or to achieve another positive accommodation outcome.

Accommodation may be provided for an individual with no local connection either for one night or temporarily via a waiver to access specialist provision only provided in Cardiff, or because of overwhelming vulnerability, health or social care grounds. The table below shows Service outcomes for November 2015 to November 2016:

Outcome	Clients
Reconnected to friends and family	33
Did not engage with Reconnection Service	27
Reconnected to make presentation at own Council	26
Offered supported accommodation via wavier or re-assessment	25
Supported to move into private rented accommodation	5
Case pending	5
Other e.g. Hospital/Prison	3
Total	124

People have been reconnected from as far apart as Barry to Brussels.

Early Intervention Options

Case Study: Reconnection Service

PG is a 38 year old male whose local connection was established as South East Wales. PG was previously known to homeless services in Cardiff and had been identified as having drug and alcohol issues. Reconnection staff engaged with PG during an outreach surgery at the Bus Project. They supported PG to attend the Council's Housing Options Centre, where he was assessed and referred into the Reconnection Service.

The Reconnection Service then worked with PG to re-establish ties with his mother, who agreed to offer PG accommodation whilst he presented to his local authority. Staff also contacted the local authority to seek advice, arrange an appointment for PG and to ensure he would be able to access drug and alcohol services in the Borough. PG is now settled in a hostel in his home area. He remains abstinent and is in regular contact with his family.

We Will:

- Continue to monitor local connection for all clients.
- Build on the success of, and ensure the sustainability of, the Reconnection Service.



Police and Other Intervention

UK Visas and Immigration

Rough sleeping is considered an abuse of free movement rights, as defined in European legislation and case law. EEA nationals found to be rough sleeping may therefore be subject to administrative removal via Home Office procedures.

A joint working protocol between the Council, Police and the UK Visas and Immigration service has been prepared, using guidelines developed from Home Office policy, to reduce the numbers of Non UK/Republic of Ireland EEA Nationals sleeping rough in Cardiff (see Appendix A).

This protocol formalises the procedures for identifying and supporting EEA national rough sleepers to claim appropriate benefits, access employment and accommodation or to voluntarily reconnect them to their country of origin. Tailored support is at the heart of this collaborative approach and a full assessment of an individual's needs will be undertaken by partners.

However, where clients disengage from services, or are assessed as unlikely to break the pattern of rough sleeping, information sharing will take place to ensure that administrative removal takes place in a safe and planned manner.

We Will: Implement the Joint Working Protocol with Police and Immigration services.

Early Intervention Options

Case Study: EEA National.

VL had arrived in the UK in August 2016, moving transiently around the UK, looking for work and rough sleeping before arriving in Cardiff. He was distressed and unkempt when presenting, he had hoped to gain employment but had been unsuccessful causing deterioration in his health and an increase in his alcohol use. VL requested a return to Romania to reside with his family.

The Reconnection Service worked with the Huggard Advocate to book VL's ticket. VL's journey was over the Christmas period, taking around three days, so he was given a warm coat and a large food parcel to make his journey easier. The Reconnection Service also provided VL with a full travel map including details of all his travel times and connecting coaches. VL returned successfully to Bacau, Romania and is now residing with his family.

South Wales Police

Designated Public Place Orders (DPPO) prohibit drinking in certain areas designated by the Council and are enforced by the Police. A city centre DPPO was implemented in Cardiff in 2010.

Local Authority Powers

The Highways Act 1980 allowed local authorities to implement Public Path Gating Orders to restrict access to alleys and lanes which experienced anti-social behaviour such as fly-tipping and burglary. The Council has implemented over 100 such Orders across Cardiff. Since the introduction of the Anti-social Behaviour, Crime and Policing Act 2014, these have been replaced by Public Space Protection Orders (PSPOs).

PSPOs have been considered elsewhere to place a general Order on whole towns to restrict certain behaviours such as leafleting/advertising, busking, begging, and rough sleeping. Many proposals have been abandoned due to public concern, but some limited Orders do exist. The Council and its partners will monitor any Orders in place to assess their success.

We Will: Closely monitor the use of Public Space Protection Orders in force in England and Wales.

Business Improvement District

Late in 2015 the Cardiff Business Improvement District (BID) was formally established. Providing business leadership for an area, the Bid also acts as a stimulus for visible improvements, whilst providing a united voice of influence and opinion. Comprising independent, SME and larger well-known chains operating predominantly in the city centre, the aim of the BID is to enhance the overall experience for visitors, shoppers and workers alike by working together to tackle local issues.

All businesses in the city centre can be affected by those who either beg from, or sleep rough outside their premises, but as identified in the BID 2016-2021 Business Plan, there is a shared acknowledgment of the need to work with agencies around the reduction and improved management of the homeless community and strategies to manage street begging and drinking.

We Will: work with the BID-branded Cardiff Ambassadors to develop solutions to ensure the city centre is a safe, secure, managed environment.

Accommodation Options



Emergency Accommodation

All outreach services share the same aim of engaging individuals to support them to access accommodation whether emergency overnight stays or a hostel bedspace, as soon as possible. In total, Cardiff has 45 emergency bedspaces across 4 providers available all year round:

- **12** bedspaces are based within the Wallich Nightshelter.
- The Wallich also provide **3** emergency spaces within Sir Julian Hodge hostel.
- There are **8** bespoke 'pods' delivered at Ty Tresillian hostel (see above).
- **12** emergency spaces are delivered by the Huggard in addition to **8** pods.
- **2** emergency spaces are provided at the YMCA hostel.

Access to this emergency provision is managed by the Housing Options Centre, or out of office hours through Outreach Staff, the Breakfast Run, the Night Bus or via direct presentations to Ty Tresillian.

Cold Weather Provision

Since the mid 1990s Cardiff has operated a Cold Weather Provision scheme to provide additional overnight accommodation to further assist rough sleepers during the cold winter months. In 2016, 52 bed spaces were made available, partly funded by the Welsh Government Transition grant:

- **20** on Huggard Day Centre floor space.
- **12** floor spaces at Ty Tresillian.
- **12** plus spaces provided by churches.
- **4** spaces at the Salvation Army's Ty Gobaith hostel.
- **4** spaces at the YMCA hostel.

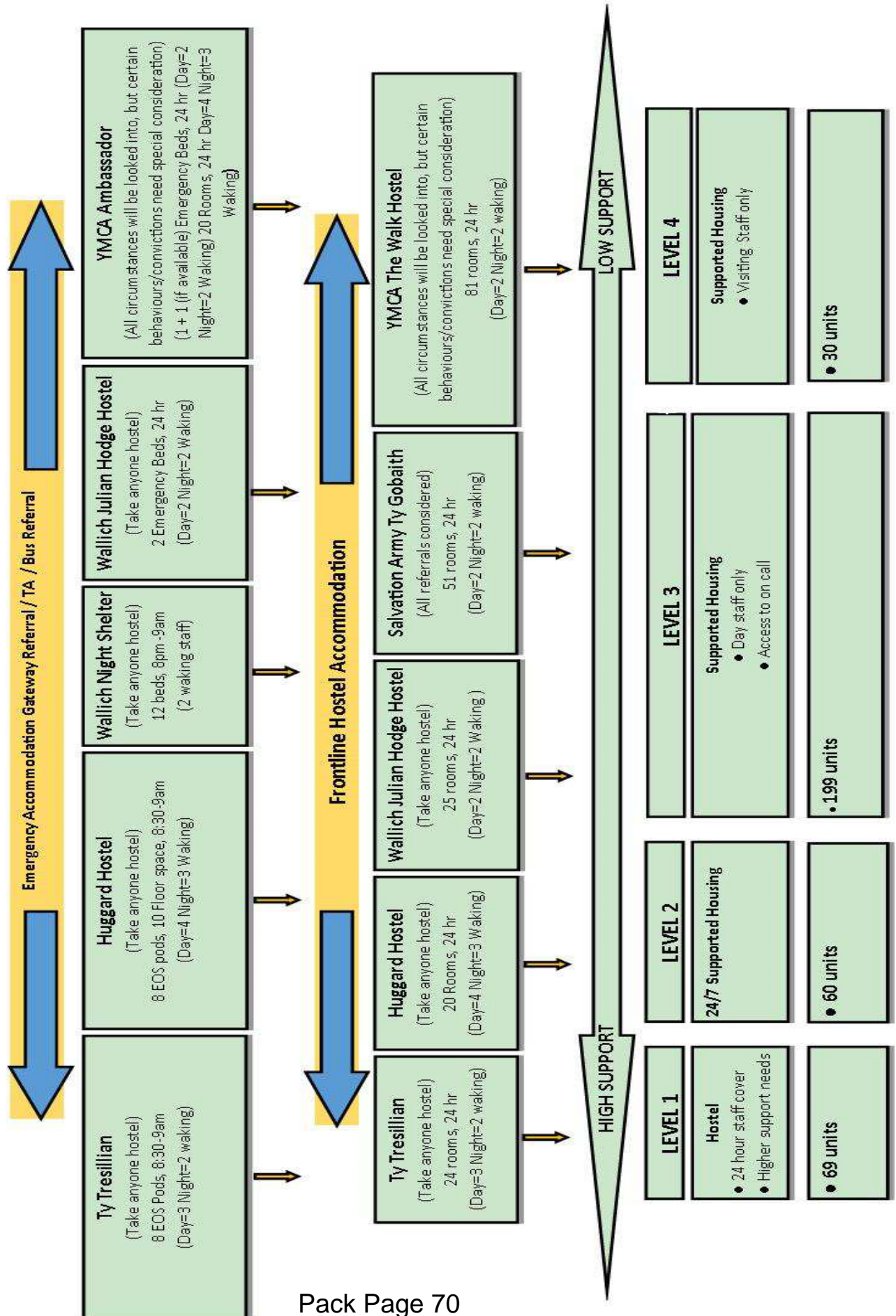
Some rough sleepers are however reluctant to use emergency accommodation.

We Will:

- Review accommodation options for rough sleepers.
- Gain a better understanding of the issues with emergency accommodation, to facilitate people coming off the streets.

Accommodation Options

Accommodation Options for Homeless, Single Adults



Accommodation Options

Hostel Bedspaces

Having accessed emergency provision, the current pathway is into existing vacant hostel, or other supported housing spaces. Cardiff has 5 large hostels that cater for single people and occasionally couples:

Hostel	Provider	Beds
Ty Tresillian	Cardiff Council	24
Cardiff YMCA	YMCA	81
Ty Gobaith	Salvation Army	66
Sir Julian Hodge	The Wallich	25
Huggard Hostel	Huggard	20

Although they all deliver generic housing-related support, some hostels specialise in addressing substance misuse, for example. Individuals may have to remain in emergency accommodation until a vacancy arises in the most suitable hostel identified to support their needs. A review of these larger hostels is underway to ensure that the best use is being made of this expensive resource. Hostels are required to support clients and be accessible 24 hours a day and therefore a substantial element of Supporting People Grant funding is used to deliver these bedspaces.

Supported Housing

The chart on the previous page shows the various types and range of accommodation based support services available for single homeless people. In total there are 559 bed spaces funded by Supporting People Grant to deliver specialist supported accommodation and move-on schemes to prepare people for independent living. Schemes can specialise in mental health, substance misuse and offending behaviour.

Some, including hostels, offer units that prepare clients for access to training and work, often with a discounted rent and provision of packed lunches and suitable work attire.

Case Study: Ty Cornel

Ty Cornel was originally developed to meet a gap in provision for a cohort of long-term street homeless people with existing substance misuse problems, which had resulted in significant physical disabilities. This partnership scheme with Adult Social Services uses joint funding to deliver housing and social care, with referrals made via the City Centre Social Work Team.

Single Persons Accommodation Gateway

Access into all hostel spaces and beyond is facilitated through a coordinated referral system, known as the Single Persons Gateway. This is one of a number of gateways developed to ensure that homeless people with particular issues or vulnerability can access the service best suited to their needs.

The Single Persons Gateway provides a 24 hour, central point of access into accommodation, operating from the Council's Housing Options Centre. This co-location ensures that everyone has access to a statutory homeless assessment in accordance with current legislation. The assessment process also covers other health and support needs, to ensure the most suitable onward placement is made.

Accommodation Options

The more entrenched rough sleepers are reluctant to access the services available at the Housing Options Centre and therefore miss out on priority services that a statutory homelessness assessment would provide. The Outreach team are best placed to carry out these assessments for rough sleepers, to ensure they have the same level of service as other homeless people.

We Will: Formalise arrangements for Council Outreach staff to undertake statutory homelessness assessments, giving clients access to services based on priority need.

Single Persons Gateway data is continually monitored and is being used to inform the Accommodation and Support Review into all Supporting People funded services. The Review aims to make improvements in how services are accessed, used and monitored and will also review other grant funding arrangements. This work will inform the development of new pathways for those with additional needs, such as mental health, and identify gaps in service which can then be appropriately procured.

Young Persons Gateway

Unlike some major cities, Cardiff does not have high levels of young people needing to sleep rough. The Homeless Outreach Team work with Children's Services to report any children or young people encountered, who may be truanting or reported as missing. Young people under 18 years old found to be sleeping rough will be given automatic priority and taken to Children's Services. The Police will be contacted if appropriate.

Young people leaving the care system or who have become homeless due to relationship breakdown with family or friends can be assisted through the 'Young Persons' Gateway. The Council's Homeless Service and Children's Services have a partnership with Llamau to provide the initial advice and assistance needed to access suitable accommodation or to provide mediation to help resolve difficult relationships. Young people are also offered an assessment with a co-located Social Worker to ensure all welfare needs are addressed.

The Young Persons Accommodation Gateway is managed by the Council's Housing Options Service and has access to a range of specialist supported accommodation for those aged 16-25, with suitable placements made dependent upon need. Once ready to move on, young people are encouraged to attend a 'training tenancy' session to provide them with the skills to manage their own tenancy.

We Will:

- Use the Single Persons Gateway to monitor usage of emergency provision to encourage move on and inform recommissioning.
- Establish refined support pathways for rough sleepers.
- Review all funding used to support homeless services to ensure sustainability and that outcomes are clearly understood and monitored.
- Develop a support service specification to prepare for recommissioning homeless hostels.
- Offer funding to pilot innovative new solutions to rough sleeping.

Independent Living

Housing First

Many people who experience rough sleeping can remain isolated on the streets as they do not want to be accommodated in hostels. A model that has received acclaim is Housing First, which started in America and has been adopted across the world. The concept is aimed at chronic rough sleepers and those who cannot break the cycle of homelessness by prioritising a move straight from the streets into a home; the concept being that if chaos is eliminated from a person's life, clinical and social stabilisation can occur faster and be more enduring.

Case Study: Tŷ'r Afon Project

ST had been rough sleeping for many years. Over time, the Outreach Team built up a bond with him and he eventually engaged with the service. ST was referred into the Tŷ'r Afon project. ST settled in well, becoming more confident and requiring only limited support.

ST moved on to his own accommodation where, unfortunately, he was subjected to bullying and abuse. In response, he became isolated and disengaged with support services. He eventually abandoned the property and returned to sleeping rough.

After a very short period, ST began to work with outreach staff again and a second referral was made to the Tŷ'r Afon Project. Following a successful period of support, ST moved into his own flat, maintaining contact with all services. He also started to volunteer with various homeless charities in Cardiff. ST is much happier at this accommodation, has grown in confidence and is well on his way to full independence.

In Cardiff an alternative accommodation model has been developed under the principles of the housing first model. Although the accommodation is temporary rather than a full tenancy, Tŷ'r Afon places people directly in their own self-contained flat without preconditions and without them needing to move through different levels of housing in a staged approach to independent living. The table details outcomes for the Project since its establishment in February 2011:

Outcome	Clients
Positive move to permanent Council accommodation	9
Positive move into private rented sector	10
Positive move into supported accommodation	5
Positive move into temporary accommodation	1
Positive move family reunion	1
Abandoned by resident	4
Evicted	5
Other	3
Total	38

The project has achieved positive resettlement for clients who had previously failed to engage or maintain other homeless provision, offering strong support for the development of similar schemes.

We Will: Further develop independent living solutions utilising the principles of Housing First and investigate the feasibility of adopting the full model.

Independent Living

Common Waiting List

The Cardiff Housing Allocation Scheme manages how social housing is allocated. Applicants join a waiting list and are prioritised according to need. Where there is no fixed abode, clients can register using a 'care of' address, which can be a hostel or the Homeless Outreach Team.

Offers of accommodation through the Tŷ'r Afon Project are given a priority allocation due to the timeliness of managing move-on. Other rough sleepers who are not willing to access formal support services are recorded as being in high housing need and will wait for a suitable offer of social housing.

Private Rented Sector

An alternative to social housing is to access private rented accommodation, especially where clients want to live in certain wards where there is limited social housing stock. Many landlords are now working with the Council to accept homeless people - staff within the Housing Options Service provide a team called Cardiff Housing Solutions to work with landlords. The service offers:

- A tenant finding and matching service and accompanied viewings.
- Property inspection, inventory and Health and Safety Rating System checks.
- Dedicated Account Management offering support, mediation and advice for landlord and tenant.
- Dedicated fast-tracked Housing Benefit service and direct payments.
- Provision of bonds.

In return, landlords are expected to provide quality properties at reasonable rent levels (Local Housing Allowance rates) and offer a minimum 6 month written tenancy agreement.



We Will: Ensure rough sleepers are given equitable access to private rented sector properties.

Tenancy Support

In order for any settled accommodation to work, many rough sleepers will require an element of tenancy support to help them stabilise and maintain a home.

Tenancy support is currently provided during weekday hours which works well for the majority of people. However, in order to make the transition to accommodation successful, rough sleepers may initially require a more intensive service, which could include evening and weekend support.

We Will: Refocus housing-related support services to address the needs of former rough sleepers.

Independent Living

Maintaining Independence

Individualised Budgets

Following a successful pilot scheme, the Council has maintained a small budget to work directly with hard to reach rough sleepers. In agreement with their caseworker, the scheme allows individual service users to make limited spends on items they believe will help bring about change. This could be a basic mobile phone to assist with maintaining contact and keeping appointments, through to furniture for accommodation once resettled.

The aim is to focus on the individual rather than simply repeating standard offers, provide a greater flexibility to reach out to those that are not engaging with services and to maximise the choices and control available to them. To make the use of this funding effective, it needs to support the activities identified within the agreed action plan of each individual.

We Will: Fully integrate Individualised Budgets into the improved casework management approach.

Reintegrating into Society

As with many homeless people, to make resettlement and independence truly successful, former rough sleepers need to have a reason to get up and be active each day. Many of the supported housing providers recognise this and deliver a range of diversionary activities which are also open to rough sleepers. Returning to hobbies and interests will ensure that homeless people can re-engage in society.

Case Study: Huggard Roots Project

Service user EF first came to the Huggard Centre as a rough sleeper. He was reluctant to access services and was finding shelter nightly in town or camping out. EF expressed interest in working the land and learning to grow his own food.

He was referred to the Roots Project and started to volunteer building raised beds and learning how to use them. He became familiar with the Huggard emergency overnight stay and began to engage in the service. Months later EF is now living in Huggard shared accommodation following the stabilising experience and confidence built whilst volunteering at the centre.

We Will:

- Look at pathways into existing diversionary activities and develop additional activities as necessary.
- Explore ways of supporting rough sleepers with their transition into accommodation and eventual independence.

Welfare Reform

Financial support provided through Housing Benefit or Universal Credit in the private rented sector is restricted to the Local Housing Allowance (LHA) rate that is relevant to the household make-up and circumstances. A single claimant under the age of 35 with no dependant children will qualify for the shared accommodation rate. It has been announced that these LHA restrictions will now be implemented for social tenants with effect from April 2019 to align with the level of financial support provided in the private sector.

Independent Living

Some groups of under 35 year olds will be exempt from the shared accommodation rate regardless of tenure. The exemptions that are most likely to apply to former rough sleepers are:

- Being in receipt of Middle or Higher Rate Disability Living Allowance Care;
- Being in receipt of Personal Independence Payment Daily Living;
- Being a former resident of a specialist hostel, who is aged over 25 and living in self contained accommodation;
- Certain prison leavers, aged over 25 and in self contained accommodation.

Those rough sleepers who are not exempt will face an additional barrier to achieving successful independent living.

We Will: Consider ways in which Discretionary Housing Payments may be used to assist rough sleepers who are not exempt from the shared accommodation rate.

Accessing Work

Helping people to re-train and enter the job market is the best solution to welfare reform. The Council's Into Work Team provides help to those who are unemployed or looking to upskill from their current job. Daily job clubs run in many Community Hubs as well as outreach sessions from 12 locations across Cardiff.

The Team also offer work skills training such as manual handling; food safety; IT courses; confidence building and interview skills. Those exiting rough sleeping can access this support, especially following successful

engagement with diversionary activities, or where ready to re-enter the job market.

We Will: Seek to engage the Council's Into Work Advisers to assist former rough sleepers as soon as possible following resettlement.

Case Study: Tony's Story

"I became homeless when my wife died five years ago. I was getting into trouble as I could not cope and got locked up. I had to decide whether to make a change or stay stuck in this cycle. I then spent two years on the streets in Cardiff. I was offered hostel spaces but kept refusing as I did not want to end up in those circles where I would end up taking smack/crack. I kept refusing hostels until I was offered temporary accommodation, which I was in for about six months. Now I've been in my permanent flat for four and a half months.

I now volunteer with the charity Boomerang, helping the homeless with furniture and fittings when they get accommodated, putting something back after the help I received."



Addressing Begging

The general public often does not distinguish between rough sleepers and people who are begging. Not all rough sleepers beg on the streets; many use established charitable options to seek food and supplies. Similarly not all those begging are rough sleepers; many use this as their regular income source and are suitably accommodated, whilst a small proportion are linked to organised crime.

Anecdotal evidence suggests that people can earn very significant sums of money from begging, especially during major sporting and other events in the city. Intelligence also demonstrates that the number of street beggars significantly increases on these occasions. The city centre in particular has a visible issue with street begging, however this is becoming more of an issue in community shopping areas. People have identified lucrative spots with high footfall, offering opportunities to receive donations from the general public. Tourists and those travelling to Cardiff for work are less likely to be aware of services available to assist people who are begging than those who are resident here.

Solutions are required that offer alternatives for those who wish to give money to people begging and presumed rough sleepers. Some local authorities in England have launched multi-agency publicity campaigns to raise awareness of the issues around giving directly to people who are begging. Posters and leaflets have been produced highlighting alternative or 'diverted giving' options such as donating to charities and recognised support services.



Council Intervention

A snapshot taken by the Homeless Outreach Team on a rugby international event day identified 64 people begging. On a non-event day the snapshot revealed just 24 people begging. Only around half of these were current rough sleepers.

The Outreach Team work with partners such as the Huggard Day Centre to discourage rough sleepers away from begging and other anti-social behaviour. This includes assisting with welfare benefits, referring into accommodation and signposting to diversionary activities. As the majority of begging is linked to drug or alcohol issues, the team also encourage and support rough sleepers to attend specialist substance misuse services, as applicable.

Police Intervention

All persistent begging will be subject to Police powers, such as those contained in Part 3 - 'Dispersal Powers' of the Anti-social Behaviour, Crime and Policing Act 2014. Where these fail, the Police can resort to applying a Criminal Behaviour Order as outlined in Part 2 of the same Act.

Addressing Begging

South Wales Police carry out regular operations to address street begging, in particular the more aggressive behaviour that can occur. Emphasis is placed on supporting people to divert them away from this activity prior to any enforcement action being taken.

Operation Spruce

Running over the 2016 festive period, Operation Spruce targeted anti-social behaviour in the city centre, including begging offences, pedlars and street drinking. This was a Police-led initiative, working with partners from the Council's Homeless Outreach Team; Park Rangers; Licensing and Enforcement Teams and Trading Standards. The operation involved a visible policing presence to:

- Respond swiftly to crime and disorder;
- Confiscate alcohol being consumed within Designated Public Place Orders;
- Make use of Anti-social Behaviour referrals for offenders;
- Make use of Section 35 dispersal notices for drink and begging-related anti-social behaviour;
- Arrest persons begging and consider Criminal Behaviour Orders;
- Increase public and retailer confidence that the neighbourhood policing team are tackling issues;
- Maintain a positive image of the city.

Consideration was given to any vulnerabilities highlighted through contact with people who were begging. Issues such as alcohol, drugs, mental health and homelessness were directed to the relevant



agency, to ensure full support was given to the individual.

The Council's Outreach Team continue to work in partnership with the Police to address street begging.

We Will:

- Provide clear options for members of the public wanting to support rough sleepers, other than giving to people who are begging, and raise awareness of services available.
- Identify clear alternatives to begging which all partners can refer into.
- Work with local Police to assist with taking appropriate action to prevent and reduce persistent begging in the city.
- Learn from the experience of other authorities and from the evaluation of Operation Spruce and consider other actions resulting from this.

Summary of Commitments

Research - *We Will*

Continue to benchmark with other local authorities to review and adopt relevant best practice.

Consider the findings of relevant research and pilot projects to inform future service provision.

Identifying Rough Sleepers - *We Will:*

Improve the visibility of the Homeless Outreach Team's contact details on the Council website.

Early Intervention Options - *We Will:*

Expand the Outreach Team to provide a case management approach to rough sleepers.

Improve data sharing between agencies involved with rough sleepers.

Work towards 'No First Night Out' for those who engage with services.

Strengthen the joint-working response, coordinating and refocusing all partners' efforts on getting people off the streets.

Develop procedures for closer partnership working with Faith groups.

Explore options to develop diversionary / befriending services.

Develop a support pathway through services for clients with mental health / substance misuse issues.

Review and improve partnership working between the statutory and voluntary sectors to address complex needs.

Build upon the success of the substance misuse pilot and explore further options for joint outreach with specialist partner agencies.

Develop a specialist pathway through services for females at high risk of exploitation.

Further develop the multi-agency procedures to identify and intervene with those who sleep rough on 3 separate occasions, or continuously sleep rough for 3 months.

Continue to monitor local connection for all clients.

Build on the success of, and ensure the sustainability of, the Reconnection Service.

Implement the Joint Working Protocol with Police and Immigration services.

Closely monitor the use of Public Space Protection Orders in force in England and Wales.

Work with the BID-branded Cardiff Ambassadors to develop solutions to ensure the city centre is a safe, secure, managed environment.

Summary of Commitments

Accommodation Options - *We Will:*

Review accommodation options for rough sleepers.

Gain a better understanding of the issues with emergency accommodation, to facilitate people coming off the streets.

Formalise arrangements for Council Outreach staff to undertake statutory homelessness assessments, giving clients access to services based on priority need.

Use the Single Persons Gateway to monitor usage of emergency provision to encourage move on and inform recommissioning.

Establish refined support pathways for rough sleepers.

Review all funding used to support homeless services to ensure sustainability and that outcomes are clearly understood and monitored.

Develop a support service specification to prepare for recommissioning homeless hostels.

Offer funding to pilot innovative new solutions to rough sleeping.

Independent Living - *We Will:*

Further develop independent living solutions utilising the principles of Housing First and investigate the feasibility of adopting the full model.

Ensure rough sleepers are given equitable access to private rented sector properties.

Refocus housing-related support services to address the needs of former rough sleepers.

Fully integrate Individualised Budgets into the improved casework management approach.

Look at pathways into existing diversionary activities and develop additional activities as necessary.

Explore ways of supporting rough sleepers with their transition into accommodation and eventual independence.

Consider ways in which Discretionary Housing Payments may be used to assist rough sleepers who are not exempt from the shared accommodation rate.

Seek to engage the Council's Into Work Advisers to assist former rough sleepers as soon as possible following resettlement.

Addressing Begging - *We Will:*

Provide clear options for members of the public wanting to support rough sleepers, other than giving to people who are begging, and raise awareness of services available.

Identify clear alternatives to begging which all partners can refer into.

Work with local Police to assist with taking appropriate action to prevent and reduce persistent begging in the city.

Learn from the experience of other authorities and from the evaluation of Operation Spruce and consider other actions resulting from this.

The Wallich is a Welsh homelessness charity that operates under three core objectives: getting people off the streets; keeping people off the streets; and creating opportunities for people.

Running more than 70 diverse projects, across 19 local authorities, The Wallich works with more than 6,000 people every year across Wales.

This document uses the Terms of Reference set out for the Inquiry as themes, outlining main points related to them below. Our points relating to these themes come from a wide range of members of staff at The Wallich, based on our years of experience operating in Wales.

The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping

The Wallich supports what seems to be the consensus view: the Housing (Wales) Act has shown success in some areas and for some groups of people, but there are significant gaps where more work needs to be done.

Broadly speaking, our evidence suggests that if a person has a connection to a particular area, and is considered 'priority' in terms of need, the Housing (Wales) Act can work well, and tends to be successful in terms of prevention - although this does vary across different Local Authorities (which was highlighted by the recently published report from the office of the Auditor General, which investigated how increasing homelessness demand was managed across Wales) (1).

When it comes to more complex cases, individuals who do not have priority status, or people without a local connection, support and prevention can be far less consistent. Similarly, the lack of support for single people is a significant issue.

The diversity in how the Housing (Wales) Act is being implemented across Wales – which was also highlighted in the Auditor General's - is evident in the responses of our members of staff. Wrexham County Borough Council (WCBC), for example, is cited as being pro-active in trying to both prevent homelessness and support people who are experiencing it. The Council have recently expanded their outreach team, which works alongside The Wallich's Rough Sleeper Intervention Team (RSIT). As is the case in many Local Authorities, however, there is a shortage of appropriate, affordable, good quality housing. The WCBC's local lettings team continuously work to identify private landlords with whom they can collaborate, but this is a long process.

A barrier that exists here is the reluctance of some landlords to offer properties to some tenants, as an inability to manage accommodation might compromise a tenancy. WCBC's tenancy support tends to be reactive instead of pre-emptive, and better communication between the organisations involved is needed. Better communication, both across organisations and to service users, was an important part of the Auditor General's report.

In Bridgend, the Housing (Wales) Act's removal of priority need status from prison leavers has had particularly noticeable repercussions, with rough sleepers deliberately committing offences to go back to prison where, as they see it, they have a roof over their heads. This change might also be contributing to the increase in rough sleepers, which is dealt with in a subsequent section of this document.

Members of Wallich staff from Newport commented on the fact that the changes in the Housing (Wales) Act seem to rely on people being aware of their rights and what is available to them when they are threatened with homelessness. Unless they have already engaged with services, they might not know what can be done for them and what they can expect, which often leads to people not attending for help and advice until it is too late, if they seek support at all. This links to need for the more robust communication mentioned by our members of staff in Wrexham.

What is more, Housing Options staff sometimes make decisions too quickly, particularly when it comes to issues of vulnerability and priority need. Wallich staff working in the Prisoner Release Empowerment Project have often looked further into medication use and mental or physical health issues and have subsequently had decisions made by Local Authorities overturned.

Individuals in Newport sometimes receive the standard letter confirming that they are not considered as having priority need, and feel that the Council stops engaging with them at this point. This, in turn, dissuades them from making the effort to engage or seek further support. Again, confusion about what 'priority' status does and doesn't mean is a communication issue. This lack of engagement can then lead to prejudice further down the line, where someone is seen as a 'lost cause', so to speak. Finally, in Newport, there is also a lack of the accommodation that would be needed to genuinely address the issue of homelessness, even at the prevention level. This comes up consistently, from our teams across the country.

The inclusion of private rented sector housing stock as an option for Local Authorities to discharge their duties into does increase supply, however, the resourcing of how this accommodation is accessed and maximised could be improved. The Wallich operate bond boards that enable homeless people to overcome some of the related financial barriers to such accommodation. However, we feel the expansion of such services to include social lettings type services could significantly increase the number of people being accommodated.

Conclusion: The factors affecting the rise in levels of rough sleeping are not fully understood (covered later in this document), however, it could be said that the prevention aspect of the Act has failed those who have since become homeless. Better data (covered next) will highlight exactly which Local Authorities (some might be from outside Wales) were involved, and how they did or didn't assist (again, assuming people presented) and whether they applied the legislation as intended. It could also be said that the main change to the Act is the focus on prevention, and therefore has no significant impact on those who were already homeless. We believe that the guidance relating to vulnerability needs revising, as currently, it's interpretation results in many who we feel are vulnerable (the majority of rough sleepers) not being considered a priority group.

The scale of rough sleeping in Wales and the adequacy of data

When it comes to homelessness of all types, there are difficulties surrounding the effective gathering of data. People might deliberately try and hide to keep themselves safe, and thus will not appear during headcounts. Different definitions of rough sleeping can also result in inconsistencies across different datasets.

Despite these challenges, we believe that gathering and analysing data can help us and other stakeholders better understand the issue of rough sleeping in Wales. The Wallich already gathers and publishes statistics collected by our five Rough Sleeper Intervention Teams (RSITs), which operate in Cardiff, Newport, Swansea, Bridgend and Wrexham. These teams provide humanitarian support and signposting to services, whilst recording information about the people they engage with. On our website, we publish basic data on a monthly basis, producing more detailed reports quarterly and annually. The Wallich is constantly looking to refine and update what it collects and publishes, but we believe what we publish now can provide at least a snapshot when it comes to rough sleeping in the five areas in which the RSITs operate.

For example, we can draw some broad conclusions from the data we have gathered over the past year. The number of people sleeping rough is rising in all the areas covered by the RSITs (the lowest increase is 24%, and the highest 77%). Rough sleepers tend to be male, with an average age of around 41. Over the past year, the number of brand new clients, who had not been seen by any RSIT up to this point, varies from 7% to 55% of the number of clients seen in total. This can lead us to some tentative conclusions about entrenched rough sleeping being more of an issue in some areas than others. These are the kinds of conclusions that would be better enabled by the success of the SHIN project.

The SHIN (Street Homeless Information Network) project is something The Wallich has recently embarked on with backing and financial support from Welsh Government. Taking cues from the CHAIN (Combined Homelessness and Information Network) database used across London (2), the aim of SHIN is to establish a network of organisations that support and record rough sleeping data in an in-depth, consistent and continual way. This in turn enables more detailed reporting. If Local Authorities and other organisations collected the same sets of data on a regular basis, a much richer pool of numbers from across Wales would exist. This will make it easier for us to analyse the problem of rough sleeping, and to find solutions. Once this approach is fully up and running, the aim is to gather as much information from each rough sleeper regarding their cause/s of homelessness, and the barriers to being housed.

At present, the main source of data around rough sleeping and homelessness in Wales is the Welsh Government, which in collaboration with Local Authorities and service providers carries out two counts on a yearly basis: one that takes place over a two-week period, and another that takes place over one night. However, this type of monitoring presents limitations, which the Welsh Government have recognised.

Limiting the counts to two weeks and an additional night means that variations between different times of year, for example, can't be captured. Our data shows that rough sleeping drops over winter, when additional emergency accommodation is made available. Similarly, if the one-night count takes place on the same night as a large event, the numbers could be drastically affected as the perceived lucrateness of begging could elevate rough sleeping numbers. Alternatively, police might take a tougher stance on rough sleepers because of the event, which could result in *lower* numbers. Particularly harsh weather on the night of the count is another unpredictable factor that could affect the data recorded.

Finally, the Welsh Government's definition of 'rough sleeping' could pose problems. The following is used as a definition for the one-night count: *People sleeping, about to bed down (sitting in/on or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People bedded down in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or "bashes")* (3).

This could discount people who are some distance from their beds, or rough sleepers who have not yet bedded down. While these statistics provide an idea of rough sleeping across Wales, and can highlight trends over time, a comprehensive, consistent system like SHIN could yield much better data.

Our members of staff in Newport commented that the data available around rough sleeping at the moment is inadequate: church groups who provide emergency accommodation and/or food, for example, frequently engage with rough sleepers, but do not necessarily record any data about this.

The Wallich's Carmarthenshire team commented on the nature of rural rough sleeping specifically: data collection is not as good in these areas, and as such the scale of rough sleeping in rural environments might not be fully understood. Successfully adopting the SHIN approach across Wales, and bringing in all manner of services into its scope, this problem could be mitigated.

Our Ceredigion team highlight the need for something like SHIN: one all-encompassing system, bolstered by consistent and in-depth data collection and recording.

Members of Wallich staff in Wrexham emphasise the rise in rough sleeping in their area. They do, however, refer to difficulties in accurately measuring this area, mentioning the same challenges this document has highlighted. Apparently, the two-week Welsh Government count is carried out very inconsistently across North Wales, which might result in inaccurate data from this region. Wrexham staff also mention the range of organisations and services who will be dealing with rough sleepers on a daily basis, and recording data that does not necessarily feed into a bigger database that can link these interactions. The Wallich's SHIN initiative would, we hope, allay concerns like these, and lead to much more consistent and accurate reporting.

Conclusion: Currently data is patchy and inconsistent. Understanding the causes of homelessness will better inform and improve the effectiveness of prevention work, and, understanding the barriers to rough sleepers being housed will help end and reduce the time people are forced to sleep rough. We are confident that the SHIN will effectively inform these two related areas, and give Welsh Government, Local Authorities and providers the robust data they need to drive positive change. The effectiveness of the SHIN relies on all organisations working with rough sleepers to be involved and use the system.

The causes of rough sleeping and of the apparent recent increases in rough sleeping

The causes of rough sleeping are often complex and far reaching, but interlinked. This document does not claim to provide a comprehensive list of all the causes of rough sleeping in Wales, and the increases in rough sleeping, but some contributing factors are discussed here.

To try and simplify a complex issue, consider what happens when someone loses their home (not instantly through an emergency – majority of such situations are dealt with by Local Authorities). Where someone has the ability, understanding and finances, they will more than likely secure their next accommodation with relative ease, and prevent them self from becoming homeless. For urgently required accommodation, the options could be shared house, as a lodger, back with family or friends, or a tenancy in the private rented sector or with an RSL, to name a few. The possible causes for losing the home are many, and it's safe to say that some causes are possibly preventable. Now consider someone losing their home for the same reason, but they lack either the ability (possibly due to mental health, substance misuse, reputation, learning difficulty), understanding or finances, or quite often, a combination of all three, to secure alternative accommodation prior to

their move out date. They consequently become homeless, and possibly end up sleeping rough. Therefore, the cause of their homelessness is not the reason they had to leave their previous accommodation, it's the lack of one or more of the three factors required to secure alternative accommodation; ability, understanding and/or finances.

The above is obviously a simplistic view at how people become homeless; the complexities arise when we delve deeper into why and how people's ability is impaired. Issues such as mental health and substance misuse problems may be completely unrelated to any other factors, or, they might be the result of, or a coping mechanism (respectively) from an unresolved adverse childhood experience. Therefore, the indirect causes of homelessness can originate many years previous. For the purposes of this inquiry, and considering that good work is already underway to address ACEs, we believe that focusing on the three factors; ability, understanding and finances is the most logical way to tackle the increasing levels of homelessness and rough sleeping.

So many different aspects can be covered by these three headings, for example; not having enough money will limit someone's housing options to possibly only social housing, but this, as we know is in very short supply. Consequently, someone waiting for social housing who isn't provided with emergency accommodation could end up sleeping rough. Welfare reform impacts on this even further, the true extent of which is yet to fully be felt in Wales, meaning rough sleeping levels could be set to soar.

More benefit sanctions and freezes have resulted in people missing out on welfare payments, meaning they might then struggle to make the payments they need to remain housed. The implementation of the 'Bedroom Tax' has had a disproportionately large impact in Wales.

Universal Credit poses considerable concerns; this year, it will be rolled out across the country. In England, 50% of council tenants under the new benefit are at least one month behind on their rent and 30% are two months behind. In contrast, only 10% of council tenants on housing benefit are a month behind on their rent. Although recipients can request that payments go directly to their landlords, this is not the 'default' option. While teaching people how to manage their own money is an admirable goal, if someone has not managed their own budget for a long time, this could result in rent arrears which would in turn lead to evictions. The Universal Credit transition process is also complex and potentially confusing. For example, someone currently claiming a disability benefit might have to end said benefit claim and then reapply for the housing element of Universal Credit. The longer these applications take, the more likely it is that someone will spend time sleeping rough while waiting for an outcome.

Wallich staff consistently raise the idea of 'local connection' as posing a problem. One Project Manager said that people sleeping rough in his area were 'far less likely' to receive appropriate support if they didn't have a local connection, as opposed to those that did. While areas will pay and support people without a local connection to return to the area they are connected to in some cases, this is not always an appropriate result. If someone is fleeing violence, for example, they might prefer to sleep rough in an area they are not connected to than stay somewhere they are connected, but might be at risk.

Our frontline staff consistently suggest that rough sleeping might also be rising due to a lack of services and support specifically oriented at people with complex needs, with multiple health and mental health issues (which might include drug and alcohol issues).

A lack of affordable and social housing has also exacerbated the issue. In particular, there are a lack of one bed social housing properties for single people. When it comes to the Private Rented Sector,

landlords usually require deposits, advance rent, agency fees, and references or guarantors. In most cases, the rent costs will be much more than any Local Housing Allowance being claimed. These fees are often barriers for people already renting in the PRS, let alone people who will need support to set up and maintain a tenancy.

Once again, our members of staff from different parts of Wales have more specific comments on the causes of recent increases in rough sleeping (something they all agree has happened).

In Newport, the following causes are highlighted: an increase in the number of people sleeping rough because of relationship breakdown and/or antisocial behaviour; an inability to afford increasing rent prices; a greater number of people becoming fixed in a cycle of entrenched homelessness; a lack of awareness on the part of individuals as to their rights, and what support is available to them (mentioned earlier in this document), and the increasing reliance on the use of guarantors in the Private Rented Sector – which some people who don't have a support network might struggle to find.

Our Wrexham staff suggest that increases in the popularity of some drugs might lead to increasing numbers of people sleeping rough because of substance misuse issues. In Wrexham they have encountered recent, worsening problems associated with what is colloquially known as 'Spice', a group of synthetic cannabinoids that until recently were legal. From the experiences of our team in Wrexham, these substances are addictive to the point that they stop users from attending appointments, maintaining relationships, and making any real effort to rectify their housing situations.

Members of frontline staff in Carmarthenshire have their own perspective. They suggest that the increase in the number of people that a Local Authority has a duty to house, because of the changes in legislation, mean that cases are signposted to Floating Support services, who then need to identify private accommodation. This can take time, and the longer it takes, the more likely a period of rough sleeping can result – this is evidenced by the supply of sleeping bags and blankets that Floating Support services tend to have.

A lack of suitable and affordable accommodation is once again cited by staff in Ceredigion, who also highlight the lack of support available for people with complex needs, including mental health and substance misuse issues. The same issues with private renting come up: rental prices are increasing, and many people struggle to raise deposits and advance rents, as well as agency fees. Finally, obtaining references and guarantors can be difficult for many people, especially if they are not from a particular area. The number of temporary accommodation places in the county has also decreased in the last year, which has had an impact, particularly in the southern area of Ceredigion. There are a number of rough sleepers who have been in and out of temporary accommodation several times, and have effectively blown their chances in the eyes of the Local Authority, who label them 'unwilling to cooperate'. Willingness to provide support when a person is ready to engage with it is an important part of solving this problem.

Members of The Wallich's frontline team in Bridgend specifically point to the removal of priority status from prison leavers as raising issues in the area. Bridgend is a 'host authority', and have some funding to use at their discretion. However, once a prisoner has been assisted with two weeks' worth of temporary accommodation, they will not be able to access it again. This effectively gives someone fourteen days to find housing, which is unlikely, before they end up back on the street. Individuals in Bridgend who find themselves in this situation end up deliberately re-offending, so they return to prison. They will later leave prison, arrive on the streets, and continue this cycle. Not

all Local Authorities have access to any funding to deal with this, as host authorities do, so the situation could be even worse in those areas.

Interestingly, Bridgend has also seen an influx of clients from other areas, including Cardiff, Newport, Rhondda Cynon Taf and even England. These clients have no local connection, and the majority have accessed support without securing accommodation in the Bridgend area. This group mostly consists of males older than 35, and some have even come from England. As this group grows, rough sleeping numbers are likely to increase, as it is difficult to house individuals without a local connection. They are not eligible for financial support from the Local Authority, or – if they are not from Wales - initiatives like the Discretionary Assistance Fund. In previous years, before local connection rules were so strict, Local Authorities would temporarily accommodate people.

In Bridgend, we see some familiar issues arise. Specifically, increasing numbers of people with complex needs – who have been unable to find support for those needs – have led to bigger numbers of people on the streets. ‘Complex needs’ in this case, again, refers mainly to people with substance and/or alcohol misuse issues, and physical and mental health issues. This reinforces the need for a collaborative, multi-agency approach offering support for people in such circumstances.

A recent spate of evictions in Bridgend was mostly caused by rent arrears. This could in part be down to the loss of a genuine Floating Support service (which now operates from a hub in the town centre rather than engaging with people in their own accommodation). In the past, these services could provide budgeting advice. The fact that this service existed in the past means that these evictions were, in a way, preventable.

In Swansea, there are issues with some specialist support services. Waiting times for methadone can be as long as six months, and during this time, it is likely that people with addiction issues will continue to commit crimes to fund their habits. Individuals with severe mental health issues have been evicted from specialist supported accommodation in Swansea, and the fact that they have been evicted by a place that they expected support from leaves them downhearted and, often, without realistic options.

Issues like this make it harder for people experiencing homelessness to trust or want to engage with organisations trying to help them. A similar problem arises when someone is housed and the support provided for them stops, seeing accommodation as the end of the road, rather than part of a process. Someone who leaves the streets but doesn’t build up a new support network might end up seeing their old friends, and being pulled back to their old lifestyle.

Something else that comes up across Rough Sleeper Intervention Teams is the increasing use of Public Space Protection Orders being used to prevent begging – and in some cases, rough sleeping itself – in city centres. This sometimes has the effect of preventing people who have been excluded from an area from attending appointments at Job Centres, Housing Options teams, or other organisations. Attending the appointments risks fines or jail terms. Couple this with some Local Authority Officers being too quick to label someone as ‘non-cooperative’, and it is easy to see why rough sleeping worsens. The chaotic lifestyles some rough sleepers have meant that asking them to attend appointments might often set people up to fail. This is why more creativity in the assessment process is needed.

Conclusion: Most of the feedback received by our services around Wales can relate the challenges our clients face to one or more of the three factors; ability, understanding and finances, but often a combination. Welfare reform presents us with a potential ‘perfect storm’ where rough sleeping levels could be at a very serious risk of increasing even further. Without true policy alignment between Central Government’s welfare reform and Welsh Government’s (and Central

Government's) related agenda's we face a very steep uphill battle that potentially undermines a lot of good work within the sector.

The effectiveness and availability of services including emergency accommodation

Most members of Wallich staff praised the availability of the services in their areas.

Bridgend is no exception, but staff there contrast The Wallich's model of providing structured support during both the day and night, with the emergency night shelter model. While it is important to offer emergency accommodation during the colder months, staff have witnessed the phenomenon of service users abusing substances during the day, knowing they had emergency accommodation to access at night. Similarly, people accessing emergency nightshelters during winter effectively 'put off' engaging with support services for the season, knowing they had safe warm accommodation each night.

Ceredigion has very effective advice and assistance services, including specific resources for rough sleepers. The nightshelter in the area is usually full.

In Carmarthenshire, however, the demand for temporary accommodation is growing to the extent that services are stretched. The amount of temporary accommodation provided has not been balanced by increases in Floating Support services to support vulnerable people who are temporarily housed.

In Wrexham, emergency accommodation exists, though Wallich staff raise concerns about the amount and the suitability. A nightshelter also provides temporary accommodation for males and females, but priority is given to those with a local connection. Individuals who are intoxicated or who are suspected of possessing substances will not be allowed into the shelter. Given Wrexham's current issue with substances, and in particular 'Spice', this is notable.

In accordance with Wrexham's severe weather response protocol, The Wallich provides six additional emergency spaces at the hostel. Wrexham County Borough Council are reviewing this protocol in order to ensure that it provides enough accessible accommodation if the need arises. Recently, the trigger was changed from a third night at zero degrees to a second night at zero degrees, effectively making it more likely that the severe weather plan will come into effect.

In Newport, waiting lists for accommodation are very large, and clients wait for long periods, which of course means there is a longer time in which issues can arise. The Wallich's Prisoner Release Empowerment Project is one example of a service that tries to mitigate the removal of priority status for prison leavers. However, with a lack of suitable accommodation for many in this client group, more and more return to their Local Authority as No Fixed Abode. As we have seen in other areas, clients often deliberately reoffend in order to get off the streets during an extended period of rough sleeping.

The Wallich's services – and in particular those services funded by the Supporting People grant – have been demonstrated to be broadly cost-effective in a separate exercise, published in the *Support that Saves* report (4):

Our service users back up what is effectively a cost-benefit analysis with their own qualitative praise. The following quotes come from case studies available on The Wallich's website:

- ‘Without The Wallich, I would still be in my tent.’ – Stevan
- ‘This is the right place for me at the moment. I’m settling here and I’m doing well to combat my addiction.’ – Jason
- ‘I want to thank the entire staff at The Wallich for having the heart, the passion and the drive for helping the people you do.’ – Peter
- ‘My confidence and self-esteem has grown so much and I would recommend this placement to anyone interested in going back to work.’ – Kelly, referring to The Wallich’s BOSS (Building Opportunities, Skills and Success) project, which supports ex-offenders return to work

Conclusion: The fact that during the last two years’ one-night counts have found a significant number of vacant emergency bed spaces, but people have still been found rough sleeping, suggests what has been on offer does not always meet everyone’s needs. There is also no doubt that emergency accommodation, hostels and supported accommodation are most certainly required and do meet numerous people’s needs, and without it, many more people would end up sleeping rough. Our experience suggests that there are more people sleeping on our streets with complex issues who undoubtedly need intensive supported accommodation with specialist interventions from statutory mental health and substance misuse services. However, in contrary to this, we are also seeing more people ending up on our streets who have no to very low support needs, who avoid traditional style homeless services, who simply require accommodation. In these cases, early intervention and a spend to save approach, possibly utilising the private rented sector, would be most beneficial.

The steps to prevent and tackle rough sleeping in Wales

Genuinely dealing with the issue of rough sleeping would require a range of strategies and some genuine long-term thinking and funding. One of the most striking aspects from the different parts of Wales is the lack of suitable, affordable accommodation across the country. Remedying this would be a crucial part of any tackling of rough sleeping, and homelessness of any kind.

Some members of Wallich staff highlight the need for more understanding of homelessness and related issues. In that respect, inquiries like this one are an admirable step in the right direction. However, this point also extends to an improvement in data collection and reporting (implementing The Wallich’s SHIN initiative would be an important part of this). It also means that issues often linked with homelessness, like substance and alcohol misuse, and mental health issues, also need investigation.

Improving engagement by clients with their Local Authorities is also crucial. To do this, Local Authorities need to be more willing to carry out remote assessments, rather than requiring clients to come to offices they might find daunting or have already had negative experiences in. Some councils, like Cardiff, are doing this already.

Similarly, in Wrexham, multi-agency meetings in which the various organisations that engage with rough sleepers already take place. This is good practice that could easily be shared. Likewise, in response to the issues with new psychoactive substances – including ‘Spice’ – a taskforce was established, as well as a database of individuals who might benefit most from access to detoxification and rehabilitation. Those involved with this taskforce admit that there is a lot of work still to be done, but positive outcomes have already been seen. Similar positive outcomes have also resulted from efforts to make support more accessible: ‘crisis clinics’ are held every Friday, alongside

The Wallich’s two-tier drop-in service. At these clinics, members of staff from a range of organisations are present, so that different issues can be addressed at one location.

Our staff in Bridgend list the following steps to prevent rough sleeping, as well as provide more effective support to stop it becoming worse: more direct access hostels, better support for mental health and substance abuse issues, as well as an approach oriented more around Housing First. Housing First has been shown to be successful in particular with entrenched rough sleepers who have not engaged with support services for a long time.

Our teams consistently raise the idea of ongoing support for people who have just started what might be their first rented tenancy in a long time. Simply accommodating people and then seeing the job as ‘done’ could just be setting people up to fail – and these people will be harder to engage with if they end up returning to the streets.

This longer-term view is crucial. Once people are accommodated, they might need support to find employment or return to education. This is something The Wallich focuses on. Our Building Opportunities, Skills and Success (BOSS) project is aimed at returning ex-offenders to work, and BOSS mentors begin by working with clients in prison, before their release. Once they leave, the support continues. We’ve had considerable success so far, and work with organisations like Acorn and ISG to help people find work.

Similarly, there are two projects open to service users living in our supported accommodation residential projects. The Working in Sustainable Employment (WISE) project involves employability sessions and an 8-week work placement for participants to help them become work-ready. The Residents and Service Users Volunteering Programme (RSVP) involves our service users volunteering in different parts of the organisation. We have worked with Shelter Cymru and see several service users take on Peer Researcher roles with them. In several cases, Wallich clients have gone to find employment at The Wallich.

Finally, as the recent report from the Auditor General’s office suggested, staff in Local Authorities need to be more innovative and offer more opportunities to engage. A concerted training programme and encouragement of creativity is needed here, as is a real shift to longer-term solutions rather than short-term fixes.

Conclusion: The following provides what we feel is a logical approach to steps for addressing rough sleeping in Wales, relating to the three factors; ability, understanding, and finances from the perspective of someone homeless or at risk of:

	Area	Details
Ability (people are able to do what is needed to avoid or resolve their homelessness)	Better help available for people to address their personal issues	Statutory mental health and substance misuse services being more accessible and understanding of people with complex needs and homeless/at risk of.
	Address underlying causes	More availability of specialist psychological services to address unresolved trauma
	Housing First	Removes the barriers to RS being housed; by service provider being the landlord or by negotiating with landlords

	Protection of Supporting People services	Ensuring support services are adequately resourced so that people can get the help they need when the need it, ultimately, breaking cycle of homelessness
	Supported Accommodation	Ensuring people in need of support have safe, stable and conducive environments to address their issues.
	Allocation Policies	Ensure allocation policies don't exclude or disadvantage rough sleepers from being housed in social housing
	Vulnerability guidance	Review guidance so that Housing Options staff prioritise vulnerable rough sleepers
Understanding (people know how and what to do to avoid or resolve their homelessness)	Advice	Better training for LA Housing Options staff and making the advice more accessible
	Educating children early	Appropriate school based education on housing, homelessness and related issues
	Data	Better data collection of the causes and barriers, all feeding back to educating people in how to avoid or end their homelessness - SHIN
Finances (people have or can access the financial resources to avoid or resolve their homelessness)	Welfare reform	Policy alignment between Central Government and WG's related policy areas to avoid RS levels rising even faster
	Private rented sector – Social lettings	Better resourcing that supports maximum accessibility and management and PR accommodation. Removal of lettings fees and more options to address barriers of guarantors etc.
	Housing First – individual budgets	More HF approaches adopted with individual budgets
	Affordability	More affordable housing developments
	Financial independence	People are given support to get back on their feet, work ready and back into employment, or, are in receipt of appropriate benefits (where work isn't an option)

	Spend to save by Local Authorities	Increased spending flexibility and willingness for early intervention to avoid development of entrenched lifestyles
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References

- (1) <http://www.audit.wales/system/files/publications/local-government-homelessness-2017-english.pdf>
- (2) <https://www.mungos.org/work-with-us/chain/>
- (3) <http://gov.wales/statistics-and-research/national-rough-sleeping-count/?lang=en>
- (4) https://thewallich.com/wp-content/uploads/2017/09/Support_that_Saves.pdf

Introduction:

As requested, this document acts as a summary of the oral evidence that The Salvation Army will provide to the Equalities, Local Government and Communities Committee's inquiry into rough sleeping in Wales. This information builds on the Committee's recent visit to The Salvation Army's Ty Gobaith Lifehouse in Cardiff.

This information is included in response to the inquiry's terms of reference, as set out below:

- The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping.
- The scale of rough sleeping in Wales and the adequacy of data.
- The causes of rough sleeping and of the apparent recent increases in rough sleeping.
- The effectiveness and availability of services including emergency accommodation.
- The steps to prevent and tackle rough sleeping in Wales.

The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping:

The Salvation Army believes that there are encouraging signs that Part 2 of the Housing (Wales) Act is beginning to have a positive impact on overall levels of homelessness in Wales. However, we harbour concerns that Part 2 of the Act is more successful at preventing the homelessness of certain groups than others. Since the Act's introduction in 2015, incidences of rough sleeping in Wales have increased year on year. This suggests that there are an increasing number of people who, for whatever reason, remain unable to access any kind of support to help prevent their homelessness.

A series of possible explanations have been offered for this trend, including the Act's uneven implementation across local authorities in Wales, as well as demographic changes including an increase in homeless EEA nationals. The Salvation Army's experience suggests that although the Act has broadened the level of support available, this does not necessarily mean that this support is more accessible. The issue of access is particularly pronounced amongst certain demographics. For example, evidence from our services suggests that the main beneficiaries of Part 2 of the Act appear to be women. This implies that there are specific barriers to men with experience of rough sleeping, as well as multiple and complex needs, engaging with the preventative support on offer.

The work of our outreach services demonstrates the importance of improving accessibility to support for people with experience of rough sleeping. As many of our project workers will attest, the majority of individuals sleeping rough have lost all trust in public services and are extremely reluctant to engage with what they see as a foreign process, which takes too long and is not conducive to their needs. As a result, a significant aspect of our outreach work stems from our efforts to get people into a position where they are prepared to reengage with services of all kinds. The Salvation Army Bus Project has a 98% success rate in getting people who are rough sleeping into temporary accommodation and access to the various health services they require. Crucially, the Bus Project is offered on an open access basis, meaning that people can access the support they require irrespective of their circumstances. This 'unconditional front door' is vital to the project's success.

To improve the effectiveness of Part 2 of the Act in preventing rough sleeping, The Salvation Army encourages the Committee to further investigate the link between effective outreach work and the improved take up of statutory services by people with multiple and complex needs. This will provide the Committee with an improved understanding of the extensive work that often needs to occur before people are in a position to access the support to which they are entitled.

The scale of rough sleeping in Wales and the adequacy of data:

As part of the Welsh Government's latest statistical release, it is acknowledged that "*there are significant limitations to the use of a single-night count in providing an accurate picture of the number of rough sleepers across Wales.*" The definition of a rough sleeper used for the purposes of the count also suffers from important limitations. In defining rough sleepers as persons "*who are sleeping overnight in the open air (such as shop doorways, bus shelters or parks) or in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks)*",¹ the definition excludes certain small but statistically significant groups, such as those engaging in sex work who may stay overnight, rather than sleep on the streets. As a result, The Salvation Army suspects that although the official Rough Sleeping statistics in Wales show a rise in the number of rough sleepers in recent years, this is likely to represent an underestimate.

To overcome these limitations, The Salvation Army believes that the Welsh Government should continue working with third sector organisations to share data. This will provide a more comprehensive and continuous figure, helping to identify and understand current and emerging trends that a count/estimate, which occurs once a year, will be incapable of capturing. The Welsh Government should also investigate models of best practice, including the Combined Homelessness and Information Network (CHAIN) in London,² to assess the feasibility of implementing something similar in areas of high demand like Cardiff. CHAIN is a multi-agency database funded by the Greater London Authority and administered by St Mungo's. Reports from the system are used by a range of stakeholders, including commissioning bodies to assess services' effectiveness, and at a more strategic level by policy makers to gather intelligence about trends within the rough sleeping population and to identify emerging needs.

As for wider data sources, The Salvation Army believes that the information being collected around wider aspects of homelessness policy, such as Part 2 of the Housing (Wales) Act, are making good progress. Yet, we remain concerned that not enough exposure is provided to certain groups within these statistical returns. For instance, little has been made of those households who are judged to be legally homeless, but who do not record a successful outcome under prevention and relief and are then deemed non-priority cases ineligible for the full housing duty under Section 75 of the Act. In 2016/17, this group numbered 1,233 households. This is significant because The Salvation Army suspects that most of this group will be single homeless people who are likely to end up rough sleeping once they've dropped out of the system.

The causes of rough sleeping and of the apparent recent increases in rough sleeping:

From The Salvation Army's experience of working in Wales, there appears to be no single, easily identifiable reason for the recent increase in rough sleeping. While things like welfare reform and a lack of suitable housing will certainly have played a part, many of the issues that contribute to homelessness, and rough sleeping in particular, often begin at a very young age - i.e. adverse childhood experiences. It is, therefore, vital that services working with people with experience of rough sleeping are tailored towards these kinds of needs and experiences. The Salvation Army understands that the Welsh Government is supportive of this kind of approach and has commissioned a training programme around Psychologically Informed Environments (PIE) and Trauma Informed Care, to be delivered by Cymorth Cymru. This represents a positive step and the outcomes of this training programme should be monitored closely for future learning.

It should, however, be noted that, as a whole, the homelessness and supported housing sector has been subjected to significant levels of instability in recent years. This has had a direct impact on the levels of rough sleeping in Wales. When the Commission visited with The Salvation in January of this year, a series of examples were discussed where people had committed crimes with the express intention of being sent to prison. Disturbingly, these individuals believed that their chances of receiving accommodation and support were higher in prison than if they remained on the streets. Yet, once an individual was released,

¹ <http://gov.wales/docs/statistics/2018/180201-national-rough-sleeper-count-november-2017-en.pdf>

² <https://www.mungos.org/work-with-us/chain/>

this offer of support would come to an end and they would be left with little option, but to return to the streets. These gaps in service provision must be investigated further, with particular reference to prison leavers who are no longer considered to be in priority need of support by virtue of their time in custody.

The effectiveness and availability of services including emergency accommodation:

The Salvation Army believes that the vast majority of services in Wales are doing an excellent job in difficult circumstances. Much of the positive work that occurs across Salvation Army services in Wales is down to our person-centred approach, including our commitment to work with people for as long as it takes to resolve their issues. This long term commitment is vitally important in our work with people with experience of rough sleeping, as well as those with multiple and complex needs, whose problems will often have developed over many years.

This approach is in stark contrast to the way in which support services are currently commissioned. As services are regularly commissioned on a short-term basis, the homelessness and supported housing sector is continuously under threat of cuts and change. This lack of stability can make it difficult for providers to invest in their services, with Boards unwilling to spend significant sums on projects that may not exist in a year's time. In addition, under a system that encourages competitive tendering, support contracts regularly stipulate the need for cost savings. This can affect levels of staffing and leaves services unable to cope with both the rising levels of demand and the increasing complexity of individuals' needs.

This short-term approach is likely to be exacerbated by the UK government's proposed reform of the funding system for 'short-term' supported housing, defined as any service aiming to accommodate people for up to two years. Under Westminster's current proposal, funding for housing costs (core rent and service charges) will be removed from the social security system and allocated to local authorities to administer on a discretionary, short-term basis via a cash limited grant. In creating a system for the funding of housing costs that mimics the current commissioning process for support contracts, The Salvation Army believes that this proposal will only increase the level of instability faced by residents and providers. This proposed reform should be challenged at every possible opportunity and The Salvation Army will do everything possible to support the Welsh Government in this endeavour.

The steps to prevent and tackle rough sleeping in Wales:

Besides the specific steps suggested during our previous answers, The Salvation Army believes that greater overall stability is required if further steps are to be taken to tackle rough sleeping in Wales. If we accept that the reasons for the rise in rough sleeping are multifaceted and that the needs of individuals are becoming increasingly complex, posing lasting challenges to their wellbeing, then it is imperative that we create an environment that is capable of supporting people in the long-term. Unfortunately, we believe that the contradiction between the long-term needs of many of those who find themselves rough sleeping and the short-term nature of the current commissioning cycle is antithetical to this aim. It is vital that the Welsh Government shows leadership in resolving this tension.

Given the potential impact of universal credit on levels of rough sleeping, The Salvation Army is also keen for the Welsh Government to explore potential legislative amendments, similar to those introduced by the Scottish Government. For example, under the Universal Credit (Claims and Payments) (Scotland) Amendment Regulations 2017, it will be much easier for claimants in Scotland to request twice-monthly payments, rather than monthly payments, and to have some payments made directly to persons to whom rent and services charges are due.³ This would help to ensure that claimants' finances are more secure and that they are able to focus on gaining access to the support to which they are entitled to help resolve their homelessness.

³ <http://www.legislation.gov.uk/ssi/2017/436/made>



Background on Huggard:

Operating in Cardiff since 1989, Huggard runs a Day Centre for rough sleepers, in the centre of the city, that is open 365 day a year, providing quality food, clothing, washing and laundry facilities. Meeting the basic needs of individuals, Huggard engages with the users of its centre to identify the barriers that are preventing them from breaking their individual cycle of homelessness, providing the help and support needed to achieve this. Huggard provides an advocacy service that helps people to claim benefits that they are entitled to, so that they don't have to rely on begging as their only source of income. It also enables people to claim Housing Benefit which means that they can secure accommodation of their own. Huggard supports people with substance misuse issues, in a low threshold environment, helping them to minimise the harm that they cause to themselves and others, helping people when they feel ready to engage with treatment and recovery services. We provide a Development Service that encourages homeless people to develop confidence and new skills. Providing social activities, volunteering opportunities and formal training courses, in conjunction with Huggard's Development & Job Club - which runs five mornings a week – we help to provide diversionary activities, away from the streets, and develop a person's self-esteem and employability. Huggard recognises that help, support and opportunities need to be backed up with access to accommodation. Huggard is the largest provider of emergency accommodation in Cardiff and also runs 20 bed hostel and manages 13 Houses across Cardiff. Each night, Huggard can accommodate around 100 individuals and every resident is provided with a high level of support to maximise the individual's potential to move towards independent sustainable living. Huggard also runs a Bond Board Scheme, helping people who are ready and able to set up home in the private rented sector.

Key statistics in 2017:

In 2017 Huggard has:

- seen over 23,000 visits to our centre*
- worked with over 1,500 unique individuals*
- supported 803 individuals who were sleeping rough while accessing our services*
- provided emergency accommodation to 754 individuals*
- accommodated 129 people in our hostel and houses*
- helped 71 people into homes in the private rented sector*

- helped 407 people to move into more sustainable accommodation
- raised £1.8m in benefits for homeless people
- directly responded to over 50 medical emergencies involving homeless people, through our in-house First Responder Scheme - supported by the Welsh Ambulance Service
- supported 80 people with substance misuse issues into treatment services
- ran 1,203 development sessions involving 629 individuals (representing a 99% increase on 2016)
- helped to meet the basic needs of Cardiff's rough sleepers, every day of the year, in 2017.

Responses to the Committee's terms of reference:

1. The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping:

The provisions in Part 2 of the Housing (Wales) Act have been welcomed and there is evidence that a significant number of people have benefitted from the enhanced duties under the Act, and that this has prevented homelessness for many. However, it is clear that over the past two years, in particular, the numbers of people rough sleeping and engaging in street culture activities has risen within the Welsh capital.

There is a danger that rough sleeping, street culture activities and lack of access to accommodation can be perceived to have a simple causal relationship, when the reality is more complex.

While access to good quality and affordable accommodation is a major issue affecting housing and homelessness across Wales and certainly within Cardiff, to those rough sleeping on the streets, the major barrier can be one of sustaining rather than obtaining accommodation.

In addressing this, we need to better support people with complex lives, recognising that needs go beyond housing, the absence of which is often a symptom of other issues such as substance misuse, poor physical and mental health, and institutionalisation as well as learning difficulties, family/domestic violence and adverse childhood experiences. Often it is a combination of a number of these issues which can generate a cycle of low self-esteem and confidence, hopelessness, despair and isolation.

2. The scale of rough sleeping in Wales and the adequacy of data:

- Potentially there are problems with 'snapshot' data collection to report on rough sleeping statistics. The intermittent nature of some peoples' need to sleep on the streets can hide the extent of the issue. In addition the 'gravitational pull' of street culture activities, particularly in Cardiff where street begging can be financially rewarding - particularly at night, can draw people onto the streets who have access to suitable accommodation. Snapshots also lack the sophistication to show changing numbers of individuals over time as often they will count people anonymously and fail to count those that are avoiding being seen. Therefore, data from services engaging and working with individuals need to be looked at to identify numbers, trends and to help identify need.

Working in the centre of Cardiff, Huggard has a very high engagement rate with people rough sleeping in the city and we keep database records of housing status, support needs and help provided to people that use our service. In 2017, Huggard worked with 803 unique individuals who had slept rough in the city the night before visiting our service. Of these 803 individuals, 426 were new to sleeping on the streets and had not presented to Huggard as sleeping rough prior to January 2017. Back in 2015, Huggard worked with a total of 525 unique rough sleepers and this shows that, as a service, we have seen a 53% growth in rough sleepers presenting to our service in just two years.

3. The causes of rough sleeping and of the apparent recent increases in rough sleeping:

There are a number of factors that are currently having a negative impact on rough sleeping and the apparent recent increases in rough sleeping and there is a clear interrelationship between a number of factors including, but not limited to:

- Welfare reforms
- A significant increase in substance misuse issues
- The 'gravitational pull' of street culture activities

Welfare reforms: Conditions attached to Job Seekers Allowance and access to Support and Employment Allowance, together with sanctions imposed on clients is currently a major part of Huggard's advocacy work with clients. Struggling to maintain benefit income, many individuals will resort to begging and rough sleeping, disengaging from the system if they find themselves without adequate help and support. In 2017, Huggard gained £1.8m in benefits that homeless individuals were entitled to, enabling potential access to accommodation through a Housing Benefit claim, and taking away the need to rely on street culture activities as an only form of income. Welfare reform is also a significant barrier to the increased number of individuals who now have no recourse to public funds.

A significant increase in substance misuse issues: Between 2014/15 and 2016/17, Huggard saw a 93% increase in the use of heroin among the homeless

community. These figures correlate with the increases seen in begging and rough sleeping in the city. This has had significant impact on rough sleeping due to the following:

- The money required to meet an addiction of this nature requires an individual to engage in street culture activities, e.g. begging, street based sex work.
- Individuals need to spend a large amount of time generating income, and some of the most lucrative times for those begging are late at night when people are leaving clubs and pubs in the city centre. This then requires them to stay on the street at night.
- The only accommodation that is often suitable for someone with a chronic substance misuse issue is emergency overnight accommodation that is closely supervised. Within these environments projects, at this current time, are unable to allow clients to take illicit substances and will need to exclude them if caught. This forces individuals back onto the street and breaks the engagement with services. This in turn increases the harm caused to the individual and also impacts on wider community safety.

In the past 6 months we have seen an increase in the chronic use of New Psychoactive Substances (NPSs) or SPICE as it is commonly called. This is on one hand reducing heroin use but on the other is creating greater challenges to engagement in services due to almost constant altered states of consciousness and high levels of unpredictable behaviours and levels of aggression. We are currently seeking to develop an informed response to this in our harm reduction and first responder services.

The gravitational pull of street culture activities: Cardiff as a city, and as the Capital of Wales, benefits from a significant sense of community and belonging. This manifests itself through a caring and generous approach to those finding themselves homeless and living on the streets. This is coupled by a public suspicion, informed (or misinformed) by direct observation that “not enough is being done” to address this significant social issue. The result is that begging on the streets in Cardiff can enable an individual to generate significant levels of income. As numbers begging on the street increases, so does public concern and generosity, and this in turn increases the gravitational pull. Huggard will often see and work with individuals that have secured supported accommodation being drawn back to the streets very quickly in order to regain previous income levels. We have seen significant numbers of cases where people have gone on to abandoning their accommodation and returning to sleeping rough. Some individuals will be compelled to engage in late night begging, and sleeping rough, instead of engaging with emergency accommodation services. Public generosity together with organised street ‘handouts’ can provide nightly sustenance to individuals but in turn perpetuate their long term homelessness by diverting away from services that can help to not only meet immediate basic needs but combine this with sustainable solutions to breaking an individual’s cycle of homelessness.

4. The effectiveness and availability of services including emergency accommodation:

The availability of emergency accommodation is vital in providing a safe place and for starting a process of engagement with a rough sleeper with complex issues. In Cardiff there are a range of providers offering emergency accommodation, including the council, homelessness charities and churches. These services are all well used. Despite there still being numbers of individuals sleeping rough within Cardiff all of the providers have carried vacancies within their provision. The range of different organisations providing the services indicates that this is not a problem with one particular provider, or one set of 'rules' or even a particular cohort of clients accommodated in one place. It suggests that there are other factors that influence why spaces are not taken up.

Some individuals will find themselves excluded from emergency provision for anti-social behaviour including substance misuse. The necessary communal sleeping areas and close supervision of emergency accommodation means that it is difficult for services to accommodate individuals arriving late or coming and going throughout the night. This creates a barrier to those compelled to engage in begging or street based sex work during the night and also creates a significant barrier to those needing to feed addictions during the night, who will face exclusion if caught using substances on premises.

Every effort is made, within Huggard's emergency accommodation to try and maintain access to individuals arriving late or needing to leave during the night. However, this has to be managed without creating a disturbance to other users of the service, so is not always possible.

Many users of emergency accommodation in Cardiff experience complex and often chaotic lives. Of the 754 individuals accommodate by Huggard in our emergency accommodation in 2017, 278 were moved on to more sustainable accommodation. The majority of the rest failed to maintain engagement in accommodation services.

Huggard provides a range of highly effective low threshold support with particular expertise on development work, advocacy and substance misuse/harm reduction services. Despite these services achieving positive outcomes for those who find it hardest to engage in services, we have been unable to extend our advocacy or substance misuse services to meet the demands placed upon them. Working with the homeless community, Huggard runs the busiest needle exchange service across Cardiff and the Vale, averaging 30 transactions per day, and is the only needle exchange service operating 24 hours a day, 7 days a week. Huggard is supporting the needle exchange provision through its own generated income (the equipment is provided to Huggard free of charge). We are funded to provide one advocacy post (£180 funding) and one substance misuse coordinator post (Open Access Engagement contract, through Sub Misuse APB) and we find it impossible to meet

the increased demand on these services, which should be extended to meet emerging needs, and to increase engagement and help stabilise those with chaotic lives.

It is a fundamental principle of low threshold services that they are provided at a location that is already used and has a good level of engagement with those that would benefit from them. With over 23,000 visits to the centre each year, it is unfortunate that we have not had the resources to extend these low threshold services to meet demand within Huggard's award winning facilities located on the same site as the Local Authority's Housing Options Centre, with which we work closely.

Beyond emergency accommodation, Huggard never has vacancies within its hostel and many people in emergency accommodation are waiting for suitable places, to meet their needs, in a frontline hostel within the city. The complexity of the issues faced within hostels is increasing which has meant that it is harder to progress support plans with residents to prepare them for supported housing or independent living. Huggard has vacancies within its supported houses and finds getting appropriate referrals, from those who can effectively manage a supported tenancy, difficult. When inappropriate referrals have been accepted this sets back other residents in a shared house environment and creates management, disrepair and neighbour/police issues. When someone is placed in a tenancy that they are unable to manage this undermines their self-confidence and further hinders future progression.

5. The steps to prevent and tackle rough sleeping in Wales:

Suggested steps include:

- Recognition and empathy that a lack of access to accommodation is not necessarily the barrier that causes rough sleeping.
- Support and promotion of low threshold support services that meet immediate needs as well as providing a gateway, not only to accommodation, but also to a range of social support, individual help and development opportunities.
- Steps to redirect the care and compassion shown by the public that is currently increasing the 'gravitational pull' of begging and is in turn prolonging and exacerbating rough sleeping through:
 - The development of 'whole community' homelessness charters that provide a shared set of values and principles based on care and respect for rough sleepers – supporting and developing actions and provisions that help people off the streets rather than keeping them there.
 - The development of diverted giving schemes – giving a channel for public financial donations that can go directly to those who need

financial help and also encouraging people to support the vital work of organisations who make a difference.

- Better public awareness of, and a better joined up approach from frontline homelessness providers, to demonstrate that help is there and is effective
- Ensure that there is adequate emergency accommodation provision and that this can lead into suitable hostel accommodation without significant delay
- Reduce the barriers to accessing emergency accommodation by:
 - reducing the rewards for rough sleepers engaging in the night-time economy
 - developing flexibility of access, where possible, to enable access at different times of the night
 - provision of enhanced harm reduction support and provision so that individuals needing to take substances are not excluded and forced back onto the streets
- Enhance advocacy services to help claim and maintain benefits, enabling access to HB dependent accommodation and to help prevent the loss of benefits and tenancies. This is particularly important with the impending introduction of Universal Credits.
- Enhance harm reduction services to:
 - continue to minimise the health risks to individuals and the wider public of drug use
 - provide accessible harm reduction advice to minimise the impact of substance misuse and promote better engagement
 - make appropriate supervised provision for those taking drugs to facilitate engagement, reduce exclusion from services, minimise drug related death and other serious health risks, reduce peer pressure that has resulted in the increased use of drugs among rough sleepers and, increase public safety by reducing public drug use, drug litter and related anti-social behaviours.
 - Guide people toward treatment and recovery services at their own pace, using a low threshold environment to begin a support and reflection process and enabling engagement at the moment someone decides that they want help.

Richard Edwards
Chief Executive
Huggard
Huggard Buildings
Hansen Street
Cardiff CF10 5DW

richardedwards@huggard.org.uk

029 2064 2024 / 07825 067801

The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping

I welcome the extension of the definition of threatened with homelessness to within 56 days of losing their tenancy which allows agencies more time to work to rescue the tenancy or to secure a new tenancy for the person.

However, for many young people this often doesn't apply since they are more likely to have been living at home, sofa surfing or leaving care and as a consequence will be already homeless or made immediately homeless and not find themselves within 56 days of homelessness.

We welcomed the recent debate in the Senedd of the ending of priority need, arguably anyone who does not have access to suitable accommodation or support and who is either homeless or at significant risk of homelessness should be considered to be priority need. It is simply unacceptable to suggest that any vulnerable person without access to accommodation or support does not require support under the Act to secure stable accommodation with support to access that accommodation.

However we believe that when we are talking about children, ie under 18's, who are homeless and do not have family with them, they are at significant risk and their need should be dealt with as a child in need.

The scale of rough sleeping in Wales and the adequacy of data

There are significant issues with the current approach to establishing a view of the scale of rough sleeping in Wales. Snapshot counts from local authorities provide information only on those people who are known to the local authority or who have approached official services for help. Even so, the snapshot counts show a significant increase in rough sleeping across Wales between 2014 and 2016, which is backed up by evidence from third sector charities.

We cannot rely on the current data or the official stats, since official homelessness figures are not capturing the extent of the homelessness crisis – particularly among rough sleepers and young people

It is worth adding that statistical information available to assess the scale of hidden homelessness doesn't really exist and as a consequence is even less reliable than the information relating to rough sleeping. Young people and women particularly are vulnerable here and our experience shows that for every woman or young person you see rough sleeping, there will be six or seven times as many whose homelessness is hidden. It is vital that we also look at ways to establish a more accurate picture of the scale of hidden homelessness in Wales – something which the End Youth Homelessness Cymru campaign has committed to doing.

The causes of rough sleeping and of the apparent recent increases in rough sleeping

The causes of rough sleeping are complex, and it is important that we remember that each individual's circumstances are different, therefore requiring a flexibility of support tailored to the individual's needs. It doesn't serve anyone if we look at rough sleepers as one homogenous group, it is an umbrella term that covers a range of cases, needs and circumstances, all needing individualised understanding and support.

Llamau's focus is on ending youth homelessness as a means to ending homelessness more generally. There is a significant link between youth homelessness and homelessness as an

adult, with poverty and youth homelessness being strong predictors for a future of rough sleeping, with many people experiencing several cycles of homelessness throughout their lives.

We believe that it is therefore crucial to invest in primary prevention projects which deal with Adverse Childhood Experiences, such as neglect, experience of the care system and parental drug and alcohol abuse, while the person is still young, supporting them to develop the skills and attributes that will allow them to live independently in the future. Identification of young people vulnerable to homelessness at 16+ is essential. We estimate that over 50% of these young people are known to services and if we develop an indicator, education, social services and YOS can use these and put in primary prevention programmes earlier. Again this is something that the End Youth homelessness Cymru coalition is working on.

We think it's important to acknowledge that the recent increases in rough sleeping, as well as the undoubted increases in hidden homelessness, are directly linked to UK Government policy, particularly welfare reform and benefit sanctions, along with the prevalence for young people of zero-hours contracts and rising rental costs. Much of the UK Government's welfare reform and inaction to control rising rental costs and zero-hours contracts, has disproportionately affected young people, leading to a significantly increased risk of homelessness for people under the age of 35.

The effectiveness and availability of services including emergency accommodation

The snapshot rough sleeping statistics show that, while there is emergency accommodation available, it is not accessed to full capacity, suggesting that it is not sufficiently meeting the needs of the people who need it. People who are rough sleeping are all individuals with unique support needs and unique strengths, and therefore a flexibility of support is required which meets each individual's needs.

Having spoken directly to people rough sleeping across our three main cities in South Wales, I have heard from many vulnerable people that they have not wanted to access some of the emergency accommodation available because they simply do not feel safe or are worried about the decisions they may make while accessing it. We have heard from women, who feel particularly vulnerable in a mixed-gender environment, given their history of gender-based violence and abuse and who therefore choose to sleep rough rather than access emergency accommodation. Furthermore, people who have a history of drug and alcohol misuse but who are trying to avoid further use often find the environment of emergency accommodation a threat to their attempts to stop their substance misuse. Younger people are simply scared of these environments and it is one reason why Llamau has always refused to run hostel type provision for the young people we work with.

The steps to prevent and tackle rough sleeping in Wales

There are intervention teams that do a great job in building up trust with people and getting them to access the support and accommodation they need. However, while it is vital that we make attempts to tackle rough sleeping in Wales, we must also make sure that as much focus is placed on preventing homelessness, and not simply focus on supporting people at the point of crisis. In order to both successfully prevent and tackle homelessness, we must ensure that services are allowed to take account of individual's unique needs and strengths, and which therefore deliver better outcomes. There are groups of people more vulnerable to homelessness, for whom more primary preventative support would reduce the number of people who become homeless. This includes young people, veterans and single women who do not have their children with them.

In recent years, commissioning processes have increasingly prescribed specific ways of working for set periods of time, with little or no flexibility for service providers to take account of individual needs. This often results in repeat referrals to services which, if allowed flexibility in the first place, could have supported the individual to live independently in the longer-term. Many services are directed to deal with the individual's 'lead need' only, not recognising that people have a range of needs, which, if dealt with holistically, would allow the person to move on successfully from homelessness.

We would also like to mention the efforts made in recent years to introduce Housing First approaches, but feel that we must recognise both the advantages and disadvantages of this approach and the need to further refine the approach in order to deliver the best outcomes for the individual.

We also must not lose sight of the fact that life expectancy for rough sleepers is 30 years lower than average. This was brought home to me by a woman I spoke to collapsed on the street. Over a hot coffee and toastie, I learnt this old lady, who I estimated to be in her 70s, was in fact 48. She was ill, frail and bone cold. She had night accommodation in a shelter, but during the day she had nowhere to go other than to sit on a cold pavement.

We need to face this issue head on. We need not to try to hide the facts or move rough sleepers on – I have personal experience of orders being used at peak times or during events.

I would encourage Wales to try and get a true figure and to look at the frightening increases we will see as we face still more years of cuts to public services and as mentioned before welfare reform and benefit sanctions, along with the prevalence for young people of zero-hours contracts and rising rental costs. We need a coalition much like EYH Cymru to bring together all agencies and all local authority areas to tackle create Wales-wide solutions.

Agenda Item 5

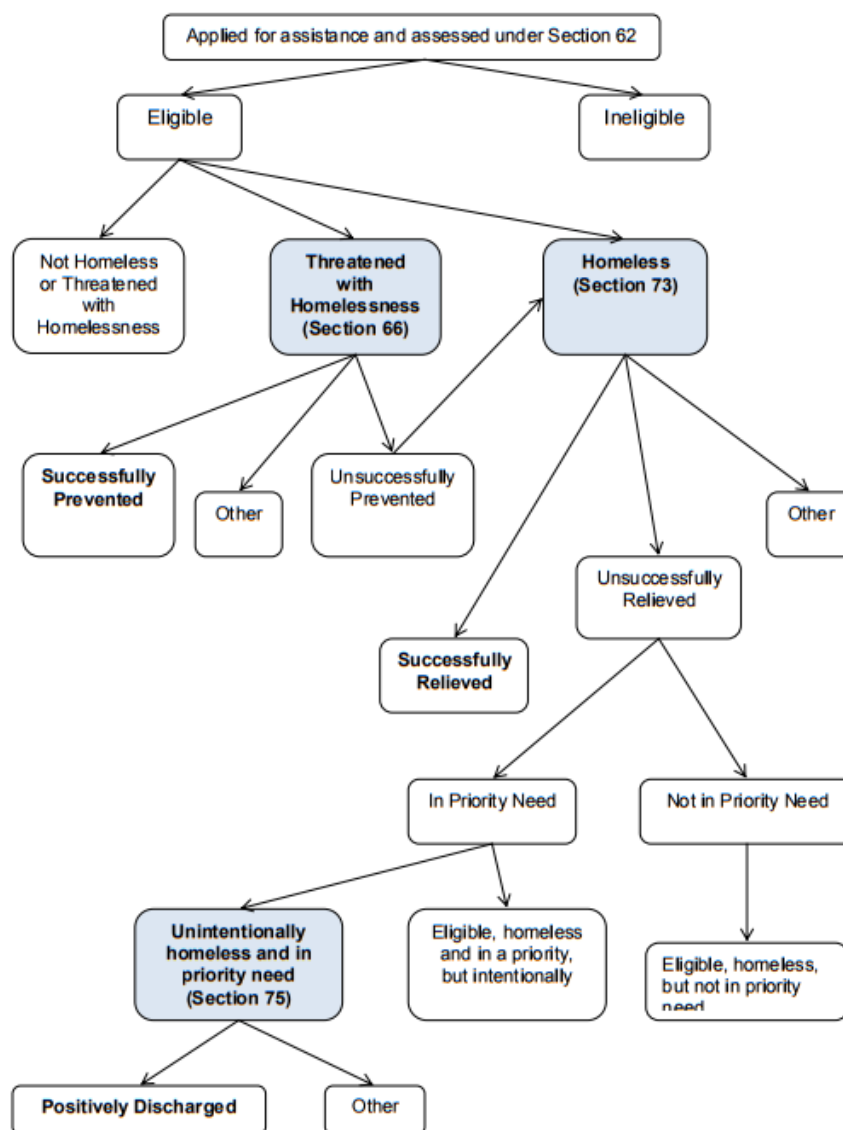
1. Introduction

- 1.1 Cymorth Cymru is the umbrella body for providers of homelessness and housing-related support services in Wales. We have over 100 members, including third sector support providers, registered social landlords and local authorities who support people to avoid homelessness and live independently in their communities. Cymorth Cymru acts as the 'voice of the sector' influencing the development and implementation of policy and legislation that affects our members and the people they support. We work in partnership with members and other stakeholders to prevent and reduce homelessness and improve the quality of life for people who are marginalised or at risk of housing crisis across Wales.
- 1.2 This is an advance paper before the oral evidence we are presenting to the Committee on 8 February 2018.
- 1.3 For more information please contact: Katie Dalton (Director, Cymorth Cymru) or Oliver Townsend (Policy Manager, Cymorth Cymru).

2. The effectiveness of Part 2 of the Housing (Wales) Act 2014 in preventing rough sleeping

Effectiveness of the Housing (Wales) Act 2014 in homelessness prevention, relief and discharge

- 2.1 The impact of the new homelessness prevention duties in Part 2 of the Housing (Wales) Act has been broadly positive, as thousands of people have been prevented from becoming homeless since it was implemented. It is difficult to estimate how many of these would have ended up sleeping rough if the prevention duties had not existed, as some would have ended up sofa surfing, staying with family or friends, or may have resolved their housing crisis with help from elsewhere. However, it would be fair to assume that a proportion of the people who have benefited from the prevention duties would have ended up sleeping rough, had they not received this help and support.
- 2.2 The flow chart in the 2016/17 statistics document illustrates the pathway for individuals who find themselves experiencing or at risk of homelessness:



- 2.3 The Welsh Government homelessness statistics for 2016/17¹ state that 9,210 households were assessed as threatened with homelessness within 56 days. For 5,718 households (62 per cent), homelessness was successfully prevented for at least 6 months. Although this is a slight decrease from 65% in 2015/16², this is in the context of much greater numbers presenting to local authorities – with 9,210 households assessed as threatened with homelessness in 2016/17 compared with 7,128 in 2015/16. This is in line with what we are hearing from our local authority members and colleagues, who tell us that increasing numbers of presentations are putting significant pressure on staff and local authority systems. However, in the context of increased demand and this being a very new piece of legislation, it is positive to see that local authorities are consistently achieving a positive outcome for over 60%. It is essential, in our view, that local authorities are given the funding, support and training resource to meet the increased demand so that they can improve the proportion of people who are prevented from becoming homeless.
- 2.4 During 2016/17, 10,884 households were assessed as homeless and owed a duty to help secure accommodation, compared to 6,891 in 2015/16. This represents an increase of 58% within a single year, which is of great concern. Although there will always be a proportion of people who become homeless with little warning or opportunity for prevention, many people could have benefited from a preventative service to help them maintain their existing accommodation or secure alternative accommodation before reaching crisis point. It is extremely concerning that 58% more people are assessed as homeless, and raises questions about the factors that have led to this increase.
- 2.5 During 2016/17, 41% were successfully relieved of their homelessness and helped to secure accommodation that was likely to last for 6 months, compared to 45% in 2015/16. Despite the significant increase in pressures on local authority services, it is positive to see that the percentage has been maintained above 40%, as there could have been a much greater decrease in light of the increased demand on services. However, it is important to recognise that a substantial proportion of people have not been able to secure accommodation likely to last for 6 months, which will be a contributing factor in the increase in rough sleeping across Wales.
- 2.6 The picture is better in both years, when considering those unintentionally homeless and in priority need. In 2016/17, 2,076 households were assessed to be priority need and unintentionally homeless, and 81% of households were positively discharged and accepted an offer of permanent accommodation. In 2015/16, there were 1,563 households in the same position, and 80% of households were positively discharged and accepted an offer of permanent accommodation. Although the success rate is much higher than in relation to the duties above, these statistics show that even for groups benefitting from additional duties under priority need, there are 1 in 5 people who are still not able to be positively discharged.
- 2.7 In 2015/16, there were 1,875 households in temporary accommodation by the end of March 31st. In 2016/17, this had risen to 2,013. 41% were families with children. Over two thirds (67 per cent) of the 2,013 households in temporary accommodation at the end of March 2017 had spent less than six months in that accommodation but 11 per cent (222 households) had been in temporary accommodation for more than a year.
- 2.8 At the end of March 2017, there were 189 households in bed and breakfast (B&B) accommodation, accounting for 9 per cent of all households in temporary accommodation, with 9 households (5 per cent) being families with children. This compares to 108 households in March 2016, accounting for 6% of all households in temporary accommodation, with 3 households (4%) being families with

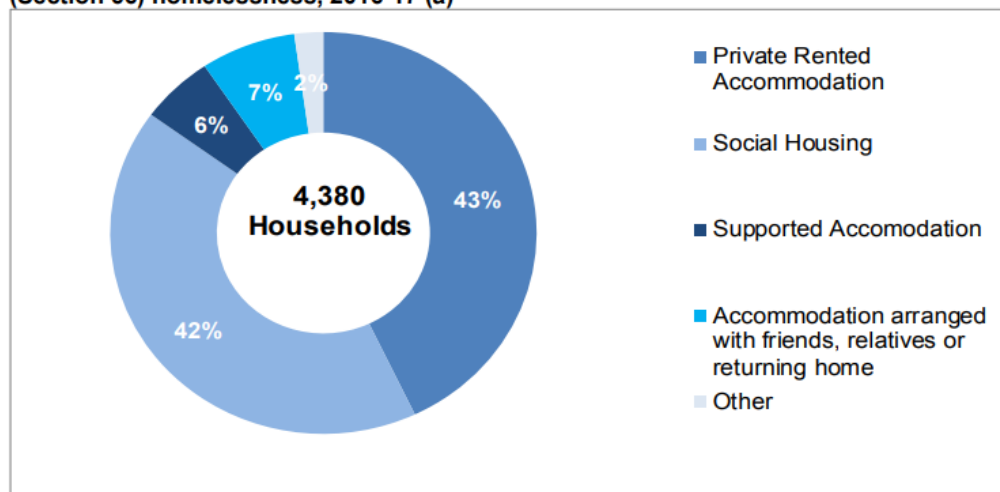
¹ <http://gov.wales/docs/statistics/2017/170727-homelessness-2016-17-en.pdf>

² <http://gov.wales/docs/statistics/2016/160824-homelessness-2015-16-en.pdf>

children. Although these numbers are small, it would be very concerning to see the upward trend continue when the use of B&B accommodation should be reducing.

- 2.9 There are several statistics that lay below the headline data that have been highlighted as areas of concern: the 18% of households who were unsuccessfully prevented, the 7% withdrawn due to lack of contact, 5% non-cooperation, and the 3% where assistance was refused. This equates to 33% - a third - of homelessness presentations in 16/17, and is an increase from 27% in 15/16. There are questions about the extent to which these statistics are hiding a worrying story about people who are not benefiting from the prevention duties within the Act, a theme that Shelter Cymru have considered closely since these statistics have been released³.
- 2.10 The data in relation to the relief of homelessness tells a similar story, but this time with a higher volume of unsuccessful interventions than with prevention. In 15/16, 29% were unsuccessfully relieved, 2% refused assistance, and 11% were marked as non-cooperative. This equates to 42%. In 16/17, 37% were unsuccessfully relieved, 8% had an application withdrawn due to lack of contact, 6% failed to cooperate, and 2% refused assistance. This equates to half of those owed a duty for relief. There is, clearly, significant progress to be made in relieving homelessness, and is an area that local authorities and providers will need to work on in the coming years. We need to develop a collective understanding of the barriers that face people who are homeless and how we can develop systems and approaches that better meet their housing and support needs.
- 2.11 There is clearly a difference in approach needed for those requiring **relief**, and those who benefit from **prevention**. This is additionally evidenced by the pie charts below, which demonstrate the additional needs of those requiring relief.
- 2.12 In 16/17, the percentage breakdown of alternative accommodation secured to **prevent** homelessness is as follows: 43% private rented; 42% social housing; 6% supported accommodation.

Chart 5: Percentage breakdown of alternative accommodation secured to prevent (Section 66) homelessness, 2016-17 (a)

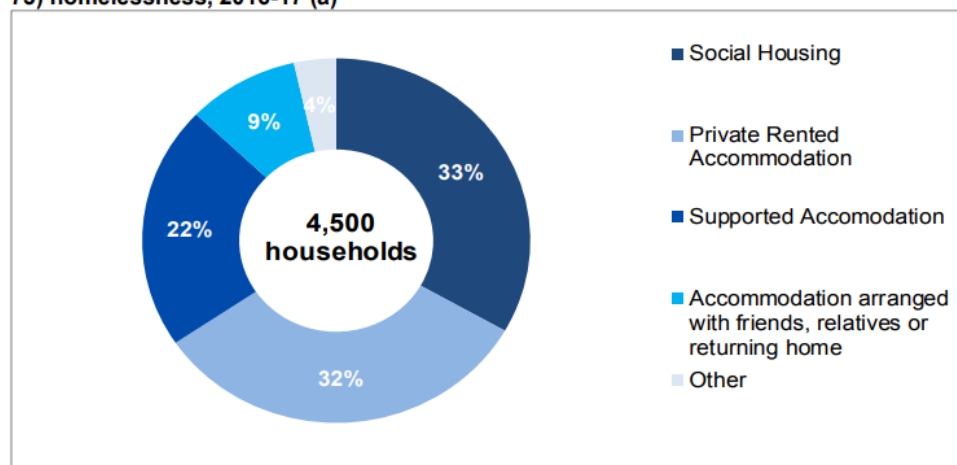


Source: Statutory Homelessness data collection from local authorities

³ <https://sheltercymru.org.uk/homelessness-and-failure-to-cooperate-we-need-to-talk-about-this/>

2.13 In the same year, the percentage breakdown of alternative accommodation secured to **relieve** homelessness was: 33% social housing, 32% private rented, and 22% supported accommodation.

Chart 6: Percentage breakdown of alternative accommodation secured to relieve (Section 73) homelessness, 2016-17 (a)



Source: Statutory Homelessness data collection from local authorities

2.14 The above information demonstrates that 85% of people who secure alternative accommodation through the 'prevention duty' do so through social housing or private rented accommodation, with just 6% moving into supported accommodation.

2.15 However, the proportion of people moving into social housing or private rented accommodation through the homelessness 'relief duty' is 65%, with 22% moving into supported accommodation. This greater reliance on supported accommodation implies that people who are already homeless have greater support needs, and highlights the importance of supported accommodation for this part of the population. Quite rightly, a great deal of focus and attention has been placed on prevention and the overall success by local authorities. Unfortunately, the increased numbers being assessed as homeless under the 'relief' duty, and the comparatively lower success rate may well be fuelling the growth in rough sleeping across Wales. We will make the point again later, but it is vital that supported accommodation is maintained as a viable option for local authorities.

2.16 This highlights the need to make a distinction between people with and without 'complex needs'. There are individuals who become homeless due to relationship breakdown or financial issues, who can be supported and helped to prevent that homelessness by dealing with debt issues or through accessing another tenancy. However, there are other people, with complex emotional and mental health problems, or with co-occurring substance misuse, or fleeing domestic abuse, who need a more tailored approach. There are positive signs that the Housing Act implementation fund has sought to tackle some of these issues, with additional staff employed to work with specific groups of homeless people or the private rented sector, to tackle affordability issues by introducing funds for deposits, advance rent, guarantees, bonds and to cover debts and arrears. However, funding uncertainty makes it difficult for local authorities to plan and guarantee these services in the future.

2.17 The recent Wales Audit Office report about managing demand in homelessness services has identified that the Housing (Wales) Act requires a culture change in order to deliver the preventative duties. Local authorities need support to ensure that they can continue to develop staff skills, build on the lessons learned from trauma-informed approaches⁴ and ensure holistic, person centred support that has a positive, lasting impact on people's lives, particularly those with complex needs.

⁴ <https://www.homeless.org.uk/our-work/resources/webinar-catchup/basic-intro-TIC>

- 2.18 In terms of the Housing (Wales) Act, there are clear examples of priority need, including those with dependent children, those who are pregnant, those who are vulnerable due to old age, mental health, physical disability or learning disability, or other reasons; care leavers at particular risk of sexual or financial exploitation; a 16 or 17 year old; a person fleeing domestic abuse or threatened abuse; a person leaving the armed forces; a former prisoner who is vulnerable as a result of having served a custodial sentence, and households homeless in an emergency.
- 2.19 However, the change to the priority need category regarding offenders has affected access to housing for this group. Although research about the impact of this is still being developed, we have anecdotal evidence from people who have been homeless that this change to priority need has reduced their ability to secure accommodation, which has in turn had a negative impact on their wellbeing and has increased the likelihood of re-offending. The development of the *National pathway for homelessness services to children, young people and adults in the secure estate*⁵ was a positive development, which involved agencies from across devolved and non-devolved, statutory and non-statutory sectors. However, there are serious questions about whether it has managed to counteract the negative impact of changes to priority need.
- 2.20 In this section, it is also important to note the continued use of the Pereira Test within Wales, as it is included on the face of the Act. A briefing⁶ at a Shelter Cymru conference breaks down the issues within the Pereira Test, but it is clear that the definition of vulnerability remains a contested issue, and it is not surprising that some local authorities will interpret it in different ways. This can result in an inconsistent experience for those who are homeless, and prevents a whole-systems approach that would reduce people falling through the ‘gaps’ identified above.

⁵ <http://gov.wales/topics/housing-and-regeneration/services-and-support/homelessness/national-pathway/?lang=en>

⁶ <https://sheltercymru.org.uk/wp-content/uploads/2015/06/Rob-Owen-Vulnerability-A-fresh-start.pdf>

3. The scale of rough sleeping in Wales and the adequacy of the data

- 3.1 It is extremely difficult to quantify the scale of rough sleeping in Wales, but data from a number of sources gives us a starting point.
- 3.2 The Welsh Government restarted their rough sleeper count in 2015 after concerns that the numbers were once again climbing. The Welsh Government acknowledge that *'There are significant limitations to the use of a single-night count in providing an accurate picture of the number of rough sleepers across Wales. The counts are snapshot estimates and can provide only a very broad indication of rough sleeping levels in particular areas on the night of the count.'*
- 3.3 **Two week estimate of people sleeping rough:** Local authorities estimated that 345 persons were sleeping rough across Wales over 2 weeks between 16th and 29th October 2017⁷. This is an increase of 10% compared to 313 persons that were estimated to be sleeping rough during the 2 weeks between 10th and 23rd October 2016. 240 persons were estimated to be sleeping rough in the 2 weeks between 2nd and 15th November 2015⁸.
- 3.4 **One night snapshot count of rough sleepers:** Local authorities reported 188 individuals observed sleeping rough across Wales between the hours of 10pm on Thursday 9th and 5am on Friday 10th of November 2017 – the night of the count. This is an increase of 33% compared to the 141 individuals observed sleeping rough in Wales between the hours of 10pm on Thursday the 3rd and 5am on Friday the 4th of November 2016. 82 individuals were observed sleeping rough in Wales between the hours of 11pm on Wednesday the 25th and 3am on Thursday the 26th November 2015.
- 3.5 Some local authority areas recorded zero people sleeping rough in the two week period or the single night count. This indicates that many rough sleepers are not being captured within the count, and therefore that the total number could be far more than the figures suggest.
- 3.6 **Emergency Bed Spaces:** Local authorities reported 233 emergency bed spaces across Wales, of which 42 (18 per cent) were unoccupied and available on the night of the snapshot count (9th November 2017). In the previous year, local authorities reported that there were 168 emergency bed spaces across Wales of which 40 (24 per cent) were unoccupied and available on the 3rd November 2016. This compared to 180 emergency bed spaces across Wales on the night of 25th November 2015, of which 19, (11 per cent), were vacant and available for use
- 3.7 **The Wallich data:** The Wallich has also produced data on rough sleeping on a weekly basis⁹ in the main cities of Cardiff, Newport, Swansea, Wrexham and Bridgend. In Cardiff, they refer to a 44%¹⁰ increase in rough sleeping. In Bridgend, they show a shocking 250%¹¹ increase in rough sleeping. In Newport there has been a 14%¹² increase. In Swansea, there has been a 43%¹³ increase in rough sleeping.
- 3.8 This is a picture that is reflected in England¹⁴ as well, which has seen the figure more than doubling over the past five years.

⁷ <http://gov.wales/docs/statistics/2018/180201-national-rough-sleeper-count-november-2017-en.pdf>

⁸ <http://gov.wales/docs/statistics/2016/160321-national-rough-sleeping-count-2015-revised-en.pdf>

⁹ <https://thewallich.com/rough-sleepers-statistics/>

¹⁰ https://thewallich.com/wp-content/uploads/2016/02/Cardiff_Q4_2017.pdf

¹¹ https://thewallich.com/wp-content/uploads/2016/02/Bridgend_Q4_2017.pdf

¹² https://thewallich.com/wp-content/uploads/2016/02/Newport_Q4_2017.pdf

¹³ https://thewallich.com/wp-content/uploads/2016/02/Swansea_Q4_2017.pdf

¹⁴ <http://www.bbc.co.uk/news/uk-england-42817123>

- 3.9 The adequacy of the data is mixed. It does demonstrate, to some extent, the trends of rough sleeping. However, it is hard to pinpoint the realistic number at each point, and there is a consistent view across Cymorth provider members that rural rough sleeping in particular is under-counted.
- 3.10 However, the third sector is currently working on the development of a system based on Combined Homelessness and Information Network (CHAIN)¹⁵, a multi-agency database recording information about rough sleepers and the wider street population in London. This work is being led by the Wallich, which can, after development, be used to gather rough sleeping numbers in real-time. This is the basis of assertive outreach models in England such as No Second Night Out, which, whilst controversial and contested, have been able to achieve some success over the border. At the minimum, a similar system in Wales will allow the organisations that work with rough sleepers to a) understand the numbers and b) be able to track and coordinate the right support packages for those individuals.

¹⁵ <https://data.london.gov.uk/dataset/chain-reports>

4. The causes of rough sleeping and the apparent recent increases in rough sleeping

- 4.1 It is widely recognised that there is no single cause of homelessness and there are multiple factors that can lead to people sleeping rough. These can include wide-ranging structural issues, such as poverty and lack of employment opportunities, government social security policies, lack of affordable housing, national and regional housing allocation and management policies, and policies in other public service areas such as health, social care and criminal justice. A wide range of individual, personal factors can also cause people to become homeless and end up sleeping rough, such as loss of income, debt, mental and physical health issues, adverse childhood experiences, and relationship breakdown.
- 4.2 In the Welsh Government statistics for 2016/17¹⁶, the causes for individuals being threatened with homelessness varied from loss of rented accommodation (over a third), 24% was due to “a parent, or other relative or friends were no longer willing to accommodate”, and for a further 12% it was due to a relationship breakdown.
- 4.3 In the same statistics, the cause for an individual becoming homeless (under Section 73) was, in 29% of cases, due to a parent, relative or friends being unwilling to accommodate; breakdown in relationship was given as reason for 21% of people; loss of rented accommodation accounted for 18%, and for 12% it was due to leaving prison.
- 4.4 Similar statistics back up homelessness under Section 75, wherein 27% of cases were due to parents, relatives or other friends not willing to accommodate, 26% due to loss of rented accommodation, and 22% due to relationship breakdown.
- 4.5 In addition the Cymorth Cymru *Health Matters*¹⁷ report, using the Homeless Link survey template, identifies a long list of causes of homelessness. The findings back up the results of the Welsh Government statistics, in that the top three causes are parents and friends unwilling to accommodate; threat of eviction, and relationship breakdown. However, the report also looks into *secondary* causes, and this demonstrates that mental health problems and substance misuse problems are, after the lack of willingness of parents to accommodate, the most common secondary causes. 33% of the sample identified physical health, mental health or alcohol and substance misuse problems as a primary or secondary cause of homelessness. The report also goes on to identify that health issues make it harder for individuals to engage with services, and vice versa. In particular, the report showed that 11% of respondents were discharged from hospital on to the street and 13% were discharged into accommodation that wasn't suitable for their needs.
- 4.6 As noted above, people with complex needs find it increasingly hard to navigate the homelessness system. In our recent service user engagement event, individuals who had experienced homelessness and rough sleeping made it clear that they had struggled to know who to go to for support, and they found the system complex and complicated.
- 4.7 There is also evidence that engagement with health services needs to improve in order to help reduce homelessness and rough sleeping. Evidence suggests that there needs to be better implementation of hospital discharge policies and of the Service framework for the treatment of people with a co-occurring mental health and substance misuse problems. Waiting lists for mental health services are also a common issue raised by people who have been homeless, with this often

¹⁶ <http://gov.wales/docs/statistics/2017/170727-homelessness-2016-17-en.pdf>

¹⁷ http://www.cymorthcymru.org.uk/files/1515/0108/8821/Cymorth_Cymru_Health_Matters_report.pdf

being a key factor in people being able to maintain a tenancy. Services need to take action quickly, and at the first point of contact, to build trust, stage effective interventions, and engage in 'assertive outreach' to ensure people do not get left behind in the system.

- 4.8 There clearly remains an issue for prison leavers, despite the development and adoption of the Prisoner Pathway¹⁸. The Welsh Government should reflect on the research that has been commissioned to look at the impact of the Housing (Wales) Act and other policies on prison leavers and consider changes to legislation if there has been a detrimental impact on this group.

¹⁸ <http://gov.wales/topics/housing-and-regeneration/services-and-support/homelessness/national-pathway/?lang=en>

5. The effectiveness and availability of services including emergency accommodation, and the steps to tackle and prevent rough sleeping in Wales

5.1 Our members continue to report success in terms of outcomes for people using homelessness and housing related support services in Wales. The impact of these services is evidenced in our report 'Experts by Experience'¹⁹, based on conversations with approximately 175 people using these services last year. However, our members are always keen to improve and develop the skills and service models, based on evidence about what works for people who are homeless or at risk of homelessness.

Crisis report 'Ending rough sleeping: What Works?'

5.2 In December 2017, Crisis published a report titled 'Ending rough sleeping: What Works?', an international evidence review of the effectiveness of interventions to reduce rough sleeping. The report concluded that the following approaches had a positive impact:

- Housing First
- Person-centred support and choice
- Swift action
- Cross-sectoral support
- Assertive outreach
- Meeting wider support needs

5.3 Furthermore, the report identified what *does not* work:

- Unsuitable hostels and shelters
- Unsuitable, absent or inadequate support

Psychologically informed approaches to preventing homelessness and delivering housing-related support

5.4 Cymorth Cymru and members have been taking forward the development of the PATH training programme, which has been funded by the Welsh Government and developed in partnership by Cymorth Cymru, the ACEs Hub and the WLGA Homelessness and Supporting People Network. The training aims to support the Welsh Government's work to reduce homelessness, by improving the skills and expertise within organisations responsible for helping people with often complex needs to access and/or maintain stable accommodation and live independent lives. It is based on international and Welsh research about the impact of Adverse Childhood Experiences and trauma on people and how the housing and homelessness sector can take a psychologically informed approach to better support vulnerable people to avoid homelessness.

5.5 This builds on existing strengths within our membership of third sector support providers, housing associations and local authority housing and Supporting People teams. This approach ensures that staff at all levels of an organisation are trained to respond in a specific way to individuals based on appreciation of their situation and experiences. It allows for an individualised service, one that is flexible for the individual, and it has achieved success in engaging those traditionally seen as 'hard

¹⁹ http://www.cymorthcymru.org.uk/files/5515/0229/2369/Experts_by_Experience_2017_-_Eng.pdf

to reach'. These approaches have been reviewed and evaluated²⁰ in England, and have already been adopted in Wales on an individual basis, but we are hopeful that this training will embed the change of culture across the nation.

- 5.6 Local authorities are effective with their prevention work, but as the statistics above show, they are not achieving the same results with their relief duties. Also, the prevalence of 'failure to cooperate' or 'loss of communication' shows a weakness in terms of successful engagement with people. However, we are really pleased to have been working with the WLGA Homelessness and Supporting People Network to develop and deliver psychologically-informed training to improve the skills and knowledge of people working in local authority housing and homelessness teams, support providers and housing associations.

Housing First

- 5.7 Alongside the development of a trauma-informed homelessness system, Cymorth Cymru is also keen to see Housing First as a model launched across Wales. This is a model with a widespread evidence base similar to the trauma-informed approaches. One example in Glasgow demonstrated that it exceeded expectations and helped reduce health problems, but also managed to engage 'serial disengagers'²¹. It is an effective model to engage with entrenched rough sleepers who have been failed by the system to date.
- 5.8 The Housing First model in Finland has seen widespread attention, with an impressive majority of tenancies maintained. A pilot in Manchester showed 80% of tenancies proved to be stable, saving £2.51 for every £1 invested²².
- 5.9 Key in the success of Housing First, is the engagement with health, both in terms of physical health needs but also mental health. This is an area where the Welsh Government launch of Housing First projects could run the risk of failure, or underachievement. A lack of health involvement could see the potential of Housing First unrealised. Individual projects have been set up with short-term Welsh Government funding, and at least one of these individual projects²³ have engaged in separate conversations with local health boards, to establish a framework by which those in Housing First projects can access health support quickly without going through a long process or being held in a waiting list.
- 5.10 Engagement with health should not have to rely on individual relationships. In order to achieve the most from Housing First, and realise the potential seen in New York and Finland, the health and housing teams at Welsh Government need to work closely together, and the Cabinet Secretary for Health needs to very publicly put his support behind this agenda. If not, the Welsh Housing First will be less effective, provide less value for money, and run the risk of leaving people without the assertive, reflexive service they need.

Supporting People Programme and ring-fencing funding

- 5.11 Finally, we must highlight the current risks to funding for short term supported accommodation. This is currently funded in two ways: the rent and eligible service charges are paid through housing

²⁰ <http://www.revolving-doors.org.uk/file/1831/download?token=Lxpv22sK>

²¹ <http://www.turningpointscotland.com/wp-content/uploads/2014/05/TPS-Housing-First-Executive-Summary-2.pdf>

²² <https://www.theguardian.com/society/2017/mar/12/housing-first-csj-report-government-finland-homelessness-strategy-sajid-javid>

²³ Salvation Army, Cardiff project

benefit to the individual and the support costs are paid to the support provider through the Supporting People Programme.

- 5.12 Over the past two years there has been significant uncertainty regarding the UK Government's plans for the future funding of rent and eligible service charges in supported accommodation. This uncertainty has led to report of some lenders and housing associations pausing development of supported accommodation. However, at the end of 2017 the UK Government outlined plans to devolve this funding for short term supported accommodation to the Welsh Government from 2020/21.
- 5.13 Unfortunately, the Welsh Government has recently introduced huge uncertainty regarding the funding for support costs in supported accommodation, with their plans to merge Supporting People funding with a number of non-housing grants in 2019/20. We believe that the ring-fence is vital, as this ensures that funding is spent on homelessness and housing-relates support services, including those for rough sleepers. The uncertainty about future funding at a time when homelessness is increasing is a great concern to us and our members.
- 5.14 Chris Hancock, Head of Housing for Crisis UK, commented: *"A number of policy decisions have led to rise in homelessness in England since 2010, but taking ring-fence off Supporting People had the biggest impact, in my opinion on rough sleeping. It is baffling that the Welsh Government have not learned lessons from that."*
- 5.15 The recent Wales Audit Office report highlighted the widespread view that Supporting People services are *'critical to prevent people becoming homeless'*. However, the report also pointed to concerns from 15 out of the 22 local authorities that key services are either unavailable, or not available to levels they need to meet demand.

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. One important service that all authorities state is critical to prevent people becoming homeless, are Supporting People services²⁴.

- 5.16 The Wales Audit Office report also highlighted the importance of ring-fenced funding for the delivery of the homelessness duties under the Housing (Wales) Act, reporting that *'Without the Welsh Government ring fenced grant, authority homelessness staff stated to us that they would not have been able to implement the Act.'*
- 5.17 As demonstrated earlier in the Welsh Government homelessness statistics, supported accommodation is one of the key solutions for accommodating people who present as homeless, and it is particularly important for people with support needs.

²⁴ Wales Audit Office 'How Local Government manages demand – Homelessness' – January 2018

Our vision

Everyone in Wales should have a decent and affordable home: it is the foundation for the health and well-being of people and communities.

Mission

Shelter Cymru's mission is to improve people's lives through our advice and support services and through training, education and information work. Through our policy, research, campaigning and lobbying, we will help overcome the barriers that stand in the way of people in Wales having a decent affordable home.

Values

- Be independent and not compromised in any aspect of our work with people in housing need.
- Work as equals with people in housing need, respect their needs, and help them to take control of their lives.
- Constructively challenge to ensure people are properly assisted and to improve good practice.

Introduction

Shelter Cymru welcomes the opportunity to provide evidence to this inquiry. We are currently conducting research with people who are street homeless in Wales: since November 2017 we have spoken with around 100 people who are currently sleeping rough in Welsh towns and cities. While this research will not be ready for publication until later this spring, we are able to share emerging findings. We're grateful that the Committee has created this opportunity to look into such an important issue.

Shelter Cymru's main purpose is to give people the advice and advocacy they need to avoid homelessness and sleeping rough. However, we do work with several hundred people sleeping rough every year. This puts us in a strong position to evaluate the current system around rough sleeping and make robust recommendations.

Effectiveness of part 2 of the Housing (Wales) Act in preventing rough sleeping

The Housing Wales Act should have led to improvements in the way that people sleeping rough are assisted. Even if people sleeping rough are found to be not in priority need, they should still have more rights than before the new legislation was introduced thanks to the duty under section 73 to ‘help to secure’ accommodation for all homeless households regardless of priority need.

However, most rough sleepers should be treated as priority need: the statutory Code of Guidance says that people sleeping rough ‘are likely to be vulnerable for an “other special reason” due to the health and social implications of their situation.’ This should mean that rough sleepers are likely to be owed a priority need and therefore be offered suitable interim accommodation while the council works with them to help find a permanent housing solution.

Unfortunately we have not seen this part of the guidance fully implemented in Wales. During our research, participants frequently mentioned a lack of priority need as a key reason why they were street homeless. This was particularly prevalent among prison leavers, who no longer have priority status and are often released without any offer of accommodation in place.

Priority need is still creating a barrier, because local authorities don’t have a duty to provide suitable interim accommodation for people who are apparently not in a priority need group. It is hard for local authorities to work effectively with people who don’t have an address – and it is harder for individuals to engage with the process and cooperate if they have to worry about where they will sleep that night.

There is evidence that in some areas local connection decisions are also problematic as they are being used inconsistently and in some cases unfairly and without proper assessments.

Our research has found that many people need more support to engage with local authority services than is currently available: many people we spoke to said they had lost track of their application and didn’t know where they were in the system. Other people were unwilling to try the council having tried in the past and been disappointed.

The scale of rough sleeping and adequacy of the data

Throughout the study we have spoken to around 100 people sleeping rough. The numbers do vary and there is a lot of churn – some people had been on the streets a few nights, others for years. The Welsh Government-led data collection does not provide a consistent picture and often only covers people sleeping within the town centre. In our study we have met people who are sleeping outside of the town in parks and other suburban areas. We also understand that the count does not always include people who are awake and walking around when they are seen. We

welcome the development of the Street Homeless Information Network (SHIN) and feel that this will be an invaluable tool to show the true extent and cycle of homelessness in Wales.

Causes and recent increases in rough sleeping

Part of the remit for our study was to examine why numbers of people sleeping rough appear to have increased in the last two years. We found that the causes of homelessness among people we have interviewed reflect those found in the majority of literature and evidence in this area. Relationship breakdown, loss of tenancy and loss of job are highly common and often co-occurring. Leaving prison and a lack of a support network is also another frequently cited cause; substance misuse issues and poor mental health are often present and add to the situation. Bereavement has also emerged as a trigger. There are some groups that seem to be particularly vulnerable to rough sleeping: prison leavers, care leavers, perpetrators of domestic abuse and couples. In short, the causes of homelessness have not significantly changed in the last few years; rather, it is the prevalence of these causes that has increased.

In some areas the levels of rough sleeping are linked to a lack of emergency provision, while in others it is due to the quality of provision. Many people told us they are too afraid to go into hostels because they perceive them as dangerous places. In one area in particular there are other macro level pressures such as the rate of population growth of the city in comparison to the housing stock levels, creating competition and increased rents which may be leading to people being squeezed out of the market. This leads to a lack of move-on accommodation and prolonged periods of time in temporary accommodation.

Exclusion from supported/emergency and temporary accommodation is also widespread and leading to rough sleeping. People felt that often these exclusions are unfair and that arbitrary decisions and rules 'set them up to fail'. We found that being banned in this way can lead to people gaining a reputation among housing providers making it harder for them to find accommodation. More needs to be done to ensure that supported accommodation meets the needs of different people, such as for example couples who want to be housed together, and people with active substance issues.

The idea of Housing First is beginning to penetrate housing and homelessness services in Wales, with numerous pilot projects currently being established thanks to Welsh Government funding and policy direction. However, by and large mainstream services are still delivered in the opposite model: 'staircasing' people from the street, into supported accommodation where they may be required to keep to rules about avoiding drugs and alcohol until they are deemed 'housing ready' and suitable permanent accommodation becomes available.

The Welsh Government has championed the concept of ‘culture change’ among homelessness services to encourage a more person-centred ethos in line with the Housing (Wales) Act. This process of culture change is still happening among services for rough sleepers. It’s vital that we listen to people’s voices and take on board their views about what is and isn’t working, rather than become defensive about current provision and blame individuals for not fitting with the system – an approach which is not in line with the person-centred ethos led by Welsh Government.

Effectiveness and availability of services including emergency accommodation

There were differences among the case study areas with quantity of emergency accommodation being the issue in two authorities. Indeed, in desperation people in one local authority were asking for the workhouses to be brought back, and while in another people were having to beg to raise enough money to stay in B&Bs overnight due to the absence of emergency provision.

In another area there was an issue of quality of provision with nearly all rough sleepers saying that they felt the current provision was too unsafe, unhealthy and intimidating. Issues such as drug use, bullying and criminal activity (being robbed, sexual exploitation) were frequently reported.

Access to treatment programmes for substance misuse was also highlighted as being problematic, although many felt that it was impossible to tackle their issue while being homeless as they needed it to cope. Mental healthcare also appeared to be difficult to access and some of the people spoke to disclosed diagnosis of serious mental illness but were unable to obtain medication. In one area people described serious issues with access to physical healthcare with cases of people with Hep C and HIV being unable to get treatment because they do not have an address.

The steps to prevent and tackle rough sleeping in Wales

Provide the right accommodation and support

We welcome the Housing First pilots as every person we spoke to said that ideally they would like their own home. However, there is a need for all services and sectors to be more trauma informed and ACEs aware as the majority of people we spoke to had experienced ACEs and in many cases were struggling to cope because of those experiences.

Supported accommodation was often a choice for people but they prefer smaller scale projects specific for particular needs. There is a need for existing provision to be more closely aligned with local housing needs, particularly for couples and people with more complex unmet needs including active substance issues.

Housing First as a principle needs to be embedded across the housing and homelessness system. We need to move away from the current system of emergency accommodation and 'staircasing' people into permanent housing. Although there will always be a need for some emergency beds, the emphasis for public spending should be on the provision of suitable permanent homes. We need other services to play a full part in this including health, social services and the police. We also need genuinely assertive outreach services and rapid re-housing, with social landlords playing a much bigger role in the provision of homes on a Housing First basis.

Honour the principle of housing as a human right

The Housing (Wales) Act has achieved great improvements in the prevention of homelessness. This puts us in a stronger position to take the next step towards a housing system that honours the principle of the human right to housing. The homelessness tests of the old system – priority need, intentionality, local connection and so on – are still creating barriers and stopping people getting the homes they need. The Welsh Government should set a timetable for the abolition of priority need over the next five to ten years and this should provide a focus for the reform of our current system, enabling Wales to maintain our edge on homelessness and further develop our world-leading approach.

Be extremely cautious about use of enforcement powers

Our research uncovered numerous examples of enforcement being used in heavy-handed and inappropriate ways. For example:

- One man was banned from the city centre on Christmas Eve, which meant he had to miss Christmas dinner and in fact had nothing to eat on Christmas Day
- One woman told us that her tent and her belongings were confiscated, which included personal items such as her baby's hospital wristband, baby photos and her own birth certificate
- Another woman told us that her tent had been cleared away by park rangers leaving her with no possessions apart from her pyjamas, thin coat and trainers.

The use of enforcement needs to be completely proportionate to the quantity and quality of the services available. We cannot use enforcement and deprivation to drive

people into provision where they do not feel safe or secure. Doing so is likely to re-traumatise people and make it even harder for services to build trust.

One solution is for Welsh Government to play a more active part in setting outcomes and guiding the work practices of Police Community Support Officers to ensure they are supporting and not undermining Welsh Government aims to prevent homelessness. Many of our research participants said that individual PCSOs and Rangers were supportive and helpful but their attitude often changed when another officer joined them. It would be beneficial to harness officers' instincts to help in a positive way.

We also voice caution about the introduction of 'diverted giving' schemes which encourage the public to not give to people who are begging. In at least one local authority in Wales there is a genuine need for people to beg as it is their only chance of affording emergency B&B accommodation. We are concerned that depriving people of this income while there are such gaps in service provision could lead to more serious consequences both for homeless people and the wider community, as well as increased stigmatisation of people with no choice but to beg for income.

Help people to navigate this complex system

The homelessness system is complex and difficult for people to navigate and requires levels of engagement, understanding and effort by the individual that is almost impossible to achieve whilst living day-to-day with complex unmet needs on the streets. Practical issues such as proof of ID, proof of being a couple and GP certificates also present barriers to people accessing help and assistance.

There is a need for more hand-holding and intensive support through the system – although the right offer of the right accommodation has to be there in order for people to even want to engage.

There also has to be a degree of flexibility around support as people may go through peaks and troughs of cooperation and capacity and the level, type and intensity of support should be able to respond to that without penalising them or jeopardising their accommodation.

Fundamentally a one-size-fits-all approach to tackling rough sleeping in Wales won't work and we need to work together across sectors to develop a raft of sustainable and viable solutions that gives people options and respects choice.

For more information please contact Rebecca Jackson, Policy & Research Officer

RJackson@sheltercymru.org.uk

02920 556120

07984694524

1 Summary

1.1 The ongoing need for people to sleep rough on the streets of the UK indicates an unacceptable societal failure. Recent homelessness projections commissioned by Crisis suggest that the scale of rough sleeping and other forms of homelessness is worsening. However, Crisis believes that homelessness can be ended for good and is developing a long-term plan this year to set out what needs to happen to end homelessness across Britain. There are specific challenges in Wales in rough sleeping but opportunities to take a lead in tackling it, drawing on the best evidence about what works.

2. Evidence of the scale and impact of rough sleeping

- 2.1 There has been a clear rise in recent years in rough sleeping in Wales. While the precise scale of the increase is unclear, research commissioned by Crisis and the Joseph Rowntree Foundation estimates an increase of between 16 to 30 per cent over the year to 2016.¹
- 2.2 On average, it was estimated in England that preventing homelessness for one year would result in a reduction in public expenditure of £9,266 per person. The potential saving could be estimated as being as high as £796,000.²
- 2.3 People sleeping on the street in England and Wales are almost 17 times more likely to have been victims of violence. More than one in three people

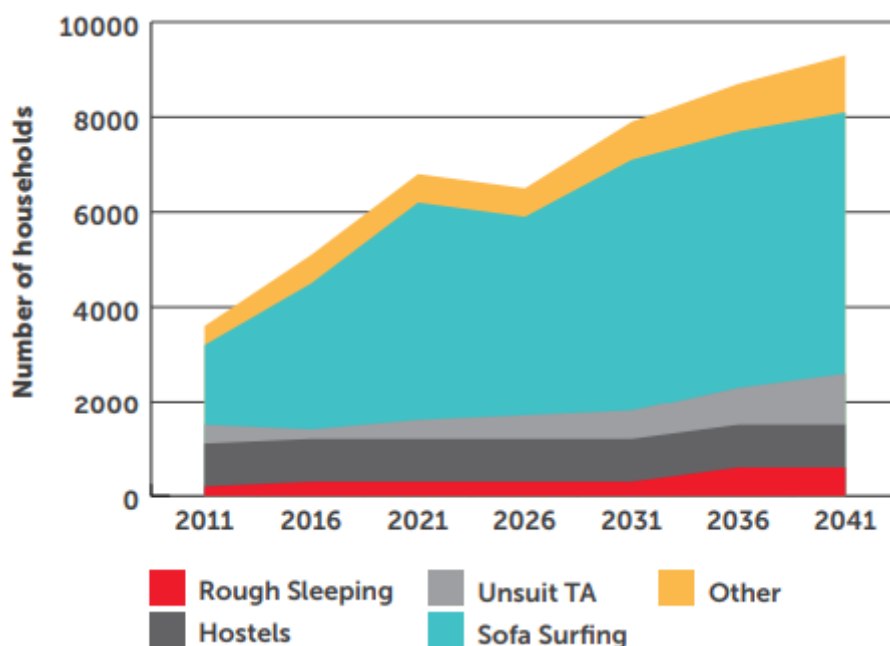
¹ Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. & Wood, J. (2017) *The Homelessness Monitor: Wales 2017*. London: Crisis - <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/homelessness-monitor/wales/the-homelessness-monitor-wales-2017/> There are further Welsh Government official figures for the year to 2017, to be published in early February after this paper was written. A Welsh Government action plan on rough sleeping is also expected around the same time.

² Pleace, N. & Culhane, D.P. (2016) *Better than Cure? Testing the case for Enhancing Prevention of Single Homelessness in England*. London: Crisis - https://www.crisis.org.uk/media/20682/crisis_better_than_cure_es_2016.pdf

sleeping rough have been deliberately hit or kicked or experienced some other form of violence while homeless.³

- 2.4 Research that projects future homelessness in Wales and Britain shows increases in rough sleeping and other types of homelessness:⁴

Graph 1: future projected homeless households by type in Wales



3. Comments on the committee’s terms of reference points

Effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping

- 3.1 The Crisis and Joseph Rowntree Foundation’s latest homelessness monitor report for Wales found the “overwhelming consensus” is that the new prevention system brought about by the Housing (Wales) Act 2014 has had many positive effects in preventing homelessness. Around two-thirds of households are seeing their homelessness successfully prevented. However, the report estimated an increase of between 16 to 30 per cent in rough sleeping over the year to 2016.⁵
- 3.2 The monitor also found a wider group of households that are legally homeless but their problems are ‘unsuccessfully relieved’ by local authority assistance and furthermore they are deemed ‘non-priority need’ cases. In

³ Sanders, B. & Albanese, F. (2016) *“It’s no life at all”: Rough sleepers’ experiences of violence and abuse on the streets of England and Wales*. London: Crisis - <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/types-of-homelessness/its-no-life-at-all-2016/>

⁴ Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis.

⁵ Homelessness Monitor: Wales 2017, p57

2016-17 there were 1,233 households in this group. In one of the interviews that informed the monitor report a respondent said:

“the legislation isn’t designed to tackle those very complex, very difficult, very, very confusing cases that do exist, and it’s those people who are going to be through the cycle of homelessness and rough sleeping.”
Voluntary sector key informant, 2017

- 3.3 The legislation in Wales gives no right to housing for rough sleepers besides the requirement for local authorities to take ‘reasonable steps to help secure accommodation’. An international evidence review Crisis commissioned commented that “...the absence of a right to temporary accommodation and support for rough sleepers, as there is in Scotland, has proven to limit any positive impacts on rough sleepers”.⁶

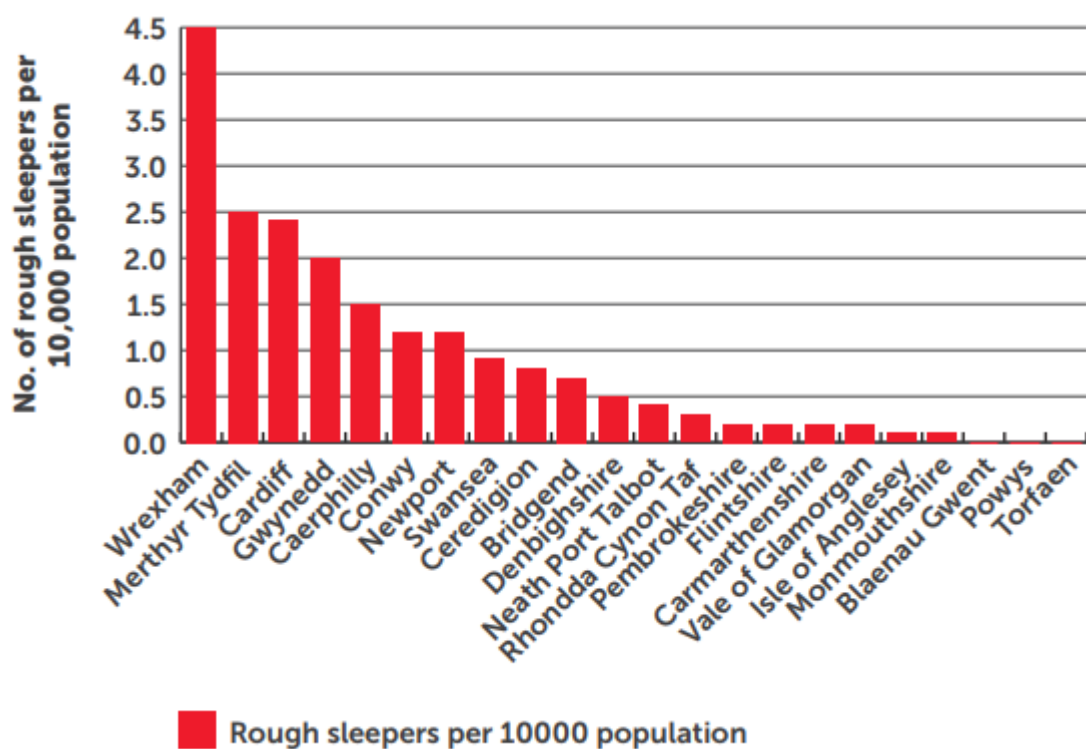
Scale of rough sleeping in Wales and the adequacy of data:

- 3.4 There is still a need for further data that are both timely and cover a wider a geographic area in Wales and that follows an individual through the homelessness system. This would help establish the true scale but also better understand what assistance the individual has had access to and the extent to which people are experiencing rough sleeping multiple times after receiving help and interventions to address their homelessness.
- 3.5 The local authority survey that informed the homelessness monitor report also found that just over half of authorities surveyed (10 out of 19) believed that rough sleeper numbers in their area had risen in the previous year.⁷ See Graph 1 for the rough sleeping rate per local authority, using the data published in 2017 for the previous year, and Graph 3 for local authority perceptions of homelessness levels by broad rural/urban type.

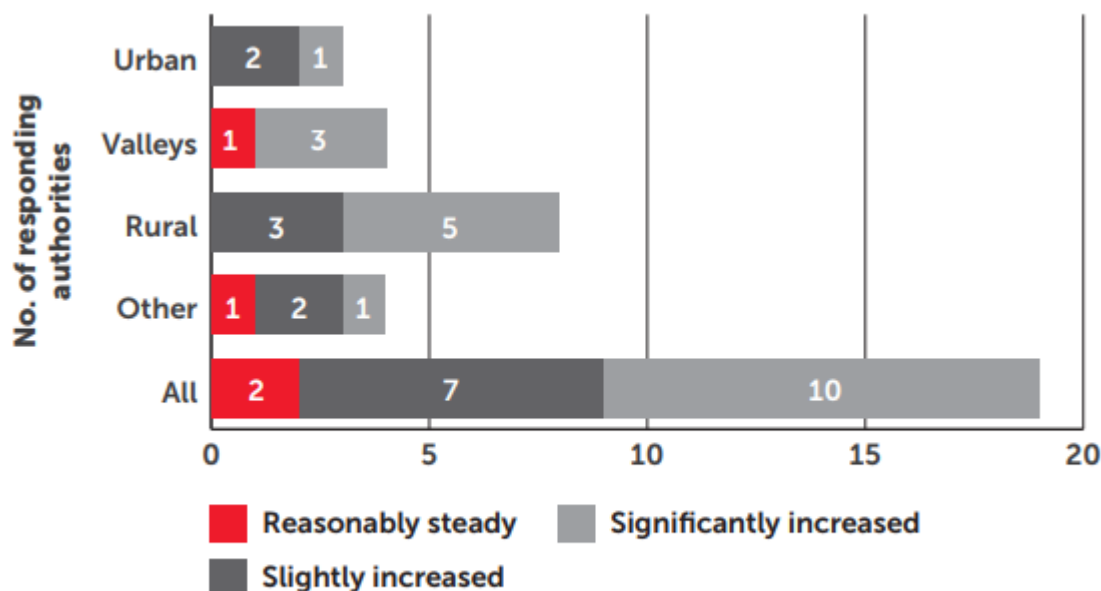
⁶ Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London, p.4

⁷ *Homelessness Monitor: Wales 2017*, p.57

Graph 2: rough sleeping rate (per 10k population) by LA



Graph 3: Local authority perceptions on change in overall homelessness demand 2015–2017 – breakdown by LA type



Source: LA online survey

- 3.6 We note also that Welsh Government is working with The Wallich to develop a system for improved measurement of rough sleeping throughout the year, which will be very welcome.

Causes of rough sleeping and the apparent recent increases in rough sleeping

- 3.7 The lack of detailed data makes it difficult to fully explain the causes behind the apparent increase. However, the survey and interview work found a range of causes mentioned, for example:

“An increase of European Economic Area (EEA) nationals [ineligible for mainstream welfare benefits], welfare reform, budget cuts to support services, [and] clients arriving from other boroughs due to lack of provision in their own area...”⁸
(Urban local authority respondent, 2017)

- 3.8 Looking forward, Crisis’ homelessness projection numbers published in 2017 found that all forms of core homelessness, including rough sleeping, were projected to get worse in the coming decades across Britain as a whole and in each individual nation.
- 3.9 The projections research found the most important driver of homelessness in all its forms is *poverty*. Other drivers include: availability and affordability of accommodation; the extent to which prevention measures are used; and the demographics of people experiencing homelessness. Using a series of ‘what if’ scenarios the research showed that cessation of welfare cuts and that focused prevention activity can make an impact on levels of core homelessness but this is limited if not accompanied by investment in affordable and accessible housing supply.⁹
- 3.10 Cymorth research into the causes of homelessness found that 33 per cent of homeless people surveyed stated their current homelessness was caused, at least in part, due to a health problem (including drug/alcohol problems although almost two-thirds of people reported using neither drugs nor alcohol).¹⁰

⁸ *Homelessness Monitor: Wales 2017*, p57

⁹ Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis.

¹⁰ Cymorth Cymru. (2017) *Health matters: the health needs of homeless people in Wales*.
http://www.cymorthcymru.org.uk/files/1515/0108/8821/Cymorth_Cymru_Health_Matters_report.pdf

The effectiveness and availability of services including emergency accommodation; and the steps to prevent and tackle rough sleeping in Wales

- 3.11 Crisis has proposed a 'housing-led' model in which everyone experiencing or threatened with any kind of homelessness is resettled as quickly as possible into their own tenancies, with support provided where needed. Housing First is a central feature of this housing-led system.
- 3.12 Crisis commissioned a review of international evidence (around 500 published studies and interviews with 11 homelessness experts) by Cardiff University and Heriot-Watt University to look at what works to end rough sleeping.¹¹ The review suggests a new approach to rough sleeping with five key principles:
- *Recognise heterogeneity* – of individual rough sleepers' housing and support needs and their different entitlements to publicly funded support. Local housing markets and rough sleeper population profiles will also vary across the UK.
 - *Take swift action* – to prevent or quickly end street homelessness, through interventions such as No Second Night Out (NSNO), thereby reducing the number of rough sleepers who develop complex needs and potentially become entrenched.
 - *Employ assertive outreach leading to a suitable accommodation offer* – by actively identifying and reaching out to rough sleepers and offering suitable accommodation.
 - *Be housing-led* – offering swift access to settled housing including the use of Housing First
 - *Offer person-centred support and choice* – via a client-centred approach based on cross-sector collaboration and commissioning. Personalised Budgets are a good example of this.
- 3.13 Public and media discussion about emergency accommodation in Wales has often turned to homeless people's attitudes towards conditions in hostels and shelters. For example, one respondent in the Crisis/Joseph Rowntree Foundation homelessness monitor said:
- “...people sometimes don't like the emergency accommodation that's on offer, so some of the hostels... are quite scary environments, and quite often people say, ' Well I'd rather sleep on the streets than go in there because it's really dodgy.'...” (Voluntary sector key informant, 2017)

¹¹ Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London

3.14 While there is clearly a role for suitably used emergency accommodation the international evidence review for Crisis has observed that international homelessness experts conclude "...shelters should only have a role if stays could be limited to exceptionally short periods..."¹² Providing temporary accommodation for people with nowhere safe to stay is a key part of the current homelessness prevention system.

About Crisis

Crisis is the national charity for homeless people. We work in England, Scotland and Wales providing support for homeless people and campaigning for change. Our team in South Wales provides education, training and support for homeless people. We carry out research to understand homelessness in Wales and campaign for the changes needed to end it for good.

For further information please contact:

Nick Morris, Policy and Communications Manager (Wales)

Nick.morris@crisis.org.uk / 07973 865679

¹² *Ending rough sleeping: what works?* p.xi

The Big Issue magazine launched in 1991 in response to the growing number of rough sleepers on the streets of London, by offering people the opportunity to earn a legitimate income through selling a magazine to the public. Twenty-five years on, our vendors come from a variety of backgrounds and face the myriad of problems associated with poverty and inequality.

Vendors buy The Big Issue magazine for £1.25 and sell it for £2.50, meaning each seller is a micro-entrepreneur who is working, not begging. Therefore it is vitally important that buyers take their copy of the magazine when they pay for it.

Since 1991, the magazine has helped over 92,000 vendors earn £115 million. There are currently around 1500 vendors, and last year alone we helped them to earn a total of £5.5 million. Currently the magazine is read by an estimated 379,195 people across the UK and circulates 82,294 copies every week.

In Wales we currently have 118 vendors selling the magazine, with distribution points in Wrexham, Llandudno, Bangor, Aberystwyth, Carmarthen, Swansea, Bridgend, Cardiff and Newport. Of the vendors we have selling, currently 14 are rough sleeping, 10 are in temporary accommodation (sofa surfing, hostels, B&B etc.), 15 are in housing association properties, and 79 are in private rented accommodation.

At The Big Issue we are in a unique position to work with rough sleepers as we are able to provide an accessible opportunity to earn a legitimate income. We provide various services to all vendors, but an important service we do provide which is invaluable for rough sleepers is that of a savings scheme. Vendors are able to save up to £100 with The Big Issue which means that those who are rough sleeping are able to carry less money on them when they are at their most vulnerable. It is well known that rough sleepers are more at risk of becoming victims of crime, and this service offers a reassurance to our rough sleeping vendors.

Terms of Reference

The effectiveness of part 2 of the Housing (Wales) Act 2014 in preventing rough sleeping

As reported in the 2017 Crisis Homeless Monitor for Wales, the Housing (Wales) Act 2014 has certainly led to less households losing their homes. The Monitor reports that nearly two thirds of households at risk of homelessness in 2016-2017 were prevented from losing their homes.

Prevention is an area of major importance to The Big Issue. Standing in the House of Lords in July 2017, Lord Bird called for a cross-party approach to 'poverty prevention,' arguing that "We know that prevention pays off. We know that when money is spent on prevention, it reaps enormous benefits." The Housing (Wales) Act 2014 is a clear example of this and is commended by The Big Issue Cymru for its success to date.

It is unlikely, however, that the act has had a real impact on rough sleeping, or at least at this stage it is difficult to evidence any success to this effect. From our experience at The Big Issue Cymru, those that we encounter who are rough sleeping have usually come from a position of temporary accommodation i.e. hostels or sofa surfing, or are prison leavers.

The scale of rough sleeping in Wales and the adequacy of data

At The Big Issue Cymru, we acknowledge the figures released in the Crisis Homelessness Monitor indicating a clear rise (16-30%) in rough sleeping in the past year in Wales. Staff report regularly of an increased visibility of rough sleeping from regular outreach across Wales.

With regards to the collection of data, The Big Issue Cymru believes there is a lack of consistency in methodology which results in challenges in making comparisons over previous years, thus making the measurement of success of schemes, projects, and policy difficult. In Wales, the most consistent form of data capture of rough sleeping comes from The Wallich who conduct regular rough sleeper counts across Wrexham, Swansea, Bridgend, Cardiff and Newport, though themselves identify the potential for statistics to be affected due to 'doubling-up' of counts in areas where The Wallich provide secondary early morning services. Recent data from The Wallich shows a further increase in rough sleeping during 'Quarter 4 2017.'

It also must be noted that the data does not include those considered the 'hidden homeless,' suggesting it is likely there are more. This includes those who are 'sofa surfing' and may not even consider themselves homeless (in particular this refers to young people who don't identify as homeless), or those who are sleeping rough somewhere that is not visible to outreach teams. At The Big Issue Cymru, we are aware of rough sleeping vendors who will 'find somewhere to stay' if the weather is poor, especially during wet weather or very cold spells. It is then seen as a priority, whereas many vendors have said they 'don't mind' sleeping outside in warm dry weather.

In order for sufficient strategies to be implemented, it is imperative that consistent and strong data is collected. This is a key area of importance.

A useful additional way to ensure vast awareness of the location of rough sleepers is to promote the use of the Streetlink app. This is an app that the public can use to notify the

appropriate services about people who may be rough sleeping. This is an easy to use service that should be more widely promoted to the public.

The causes of rough sleeping and of the apparent increases in rough sleeping

The Homeless Monitor for Wales 2017 has identified a clear shift in the main causes for homelessness in Wales. For years the root cause often cited was that of family/relationship breakdown, but now, it is that of loss of rented or 'tied' accommodation.

At The Big Issue Cymru, we often see a return to rough sleeping when someone's 'time is up' at the temporary accommodation they are accessing. This has happened to two men in Cardiff in the past week, one a prison leaver who has been staying in temporary accommodation, and another has had his 'time up' at a frontline provider's temporary accommodation. Now both have returned to the street to start the process again. This highlights the need for longer-term solutions to tackle the 'revolving door' between the street, temporary provision and the criminal justice system.

Another reason we see a return to rough sleeping is when a person has gained their own accommodation but it is 'too far away.' Due to their chaotic nature and often substance misuse, we will regularly see people choosing to sleep out in the city centre rather than make the journey home, often in part, because they don't have the money for bus fare.

It must also be noted that a large portion of our vendors who are rough sleepers are EEA Nationals and have no recourse to public funds.

At this point it is important to raise the issue of complex needs and those who have endured adverse childhood experiences (ACEs). Without getting to the root causes and providing specialist support for people to resolve issues experienced by these we believe a 'revolving door' of rough sleeping and homelessness is likely.

The effectiveness and availability of services including emergency accommodation

The Big Issue Cymru would like to take this opportunity to highlight the fantastic work of the frontline service providers across Wales who provide a brilliant service on limited resources and are a regular support to our vendors in need. This is why it is imperative the Supporting People funding is protected from 2019/2020 onwards. The Big Issue Cymru is in support of its colleagues and partners in receipt of SP funding across Wales who provide vital services to those in need.

Though there is emergency accommodation available, at The Big Issue Cymru, we are told regularly by rough sleeping vendors that they do not wish to access such accommodation due to fears of their safety and excessive drug they would be surrounded by, this may explain in part, the reason for 24% of emergency bed spaces lying empty on the night of the count. We are aware that this is a commonly cited reason for not accessing services and acknowledge that it is unlikely to be the sole reason. Our experience of working with rough sleepers is that often they are living in such a chaotic manner often linked to substance misuse, which means that they struggle to adhere to the deadlines to express the need for emergency accommodation.

The steps to prevent and tackle rough sleeping in Wales

At The Big Issue Cymru we acknowledge the increase in young people rough sleeping and as a consequence of this, an increased focus on youth homelessness. Though this is vitally important, we would like to stress a need to maintain focus on the single homeless, predominantly male, who if not already, are at risk of becoming entrenched rough sleepers. The recent figures from The Wallich rough sleeper counts highlight that 76% of rough sleepers in Cardiff, 53% in Bridgend, 65% in Newport and 47% in Swansea are aged 36-50, with the next biggest group aged 26-35. From our experience at The Big Issue Cymru, this demographic have real complex needs, predominantly mental health and substance misuse, tend to struggle to stay in accommodation, and spend time in the CJS. Also, in this age group, they are approaching the age identified as the average age at death for rough sleepers, 47 compared with 77 for the general public.

As suggested by Tim Worstall from the Adam Smith Institute, there is a need to look at alternative methods of working with those rough sleeping, it is not just about accommodation. Worstall calls for taking the treatment to the streets, referring to the “outsourcing of mental health treatment to the night air.” This has been echoed by Cardiff Council who trialled an outreach project with drugs agency Taith resulting in reasonable engagement. At The Big Issue Cymru, we conduct regular outreach across Wales and would welcome the company of specialist agencies to provide further support to those we meet both vendors and those begging or rough sleeping.

We would like to take this opportunity to stress the importance of partnership working. For a successful outcome to tackling rough sleeping in Wales organisations must work together. As an organisation originally established to provide rough sleepers with the opportunity to earn a legitimate income, we find referrals from other organisations thin and far between, though we regularly refer out to organisations to provide support for our vendors. We are aware of many organisations not only third sector but also local authority, who are aware of clients begging but do not refer them to sell The Big Issue. We have found that close partnership work with organisations can provide a close network around clients where information is shared, meetings can be attended at any partner’s location leading to an increase in attendance from the client, and outcomes are more successful. People selling The Big Issue tell us that they find selling the magazine gives them a ‘sense of purpose’ it is something to ‘fill the days’ and provides vendors the opportunity to interact with the wider public, building confidence and relationships.

In order to work closely with our partners, it is imperative that they receive sufficient funding, and we would like to echo our previous comments about the importance of maintaining the Supporting People fund.

As our founder Lord Bird argues, ‘prevention should be at the heart of policy,’ and we acknowledge the success of this in the Housing (Wales) Act 2014. However, at The Big Issue Cymru, we see a lack of prevention from the return to homelessness of those on the brink. These are the people who have experienced rough sleeping, substance misuse, have complex needs and have sold The Big Issue, but are now ‘alright.’ They are housed, free from addiction, and in employment, but they are vulnerable. We have experienced that many of these experience mental health issues such as depression and/or anxiety and provision to

tackle this is lacking. Vendors and ex-vendors we have referred to mental health services are met with six-month waiting lists for counselling services which is plenty time for a full relapse and return to rough sleeping. Alternatively they may be offered 'group sessions' which for anyone who has an understanding of anxiety would appreciate is a terrifying prospect. This is where the importance for accessible mental health provision is vitally important.

At The Big Issue Cymru we acknowledge the success of Housing First projects across Finland and the US and welcome this approach across Wales. We believe that Housing First has the potential for much better outcomes for tackling rough sleeping and would support this approach in opposition to some of the more linear 'treatment first' to provide better retention.

Finally, we feel that there needs to be improved public awareness about rough sleeping. People struggle to differentiate between those who are begging and those who are rough sleeping, people don't understand the causes of homelessness, people don't know about ACE's or complex needs and this leads to a lack of compassion, or on the other end of the spectrum, leads to unhelpful or at times dangerous generosity. This is also where the promotion of Streetlink comes in and the need to raise awareness of the app to the public.

The Big Issue Cymru would like to thank the committee for the opportunity to deliver evidence at the inquiry and look forward to the findings and the next steps on tackling rough sleeping in Wales.

Report prepared by Bethan Thomas, Regional Manager for The Big Issue.

31.01.2018

Agenda Item 6

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau
Equality, Local Government and Communities Committee
ELGC(5)-05-18 Papur 12 / Paper 12

Whilst no specific data is held by Policing across Wales regarding the extent of the problems associated with homelessness, Police Forces across Wales recognise that homelessness, crime and disorder and vulnerability can often overlap and are underpinned by complex social problems. Policing is sensitive to the fact that coercive policing powers cannot be seen as the route to addressing homelessness and as a consequence policing activity is designed to protect the vulnerable and, more often than not, make referrals to partner agencies.

Our priority is to work with and assist partners in tackling these issues, with the focus being on avoiding criminalising those who find themselves in these circumstances.

In order to respond to the complex risks associated with homelessness, the Police Service is committed to:

- Keeping people safe
- Working in partnership to protect the most vulnerable people in society;
- Working in partnership to reduce anti-social behaviour;
- Working in partnership to prevent and detect crime using the appropriate legislation proportionately;
- Signposting individuals whilst referring persons resorting to begging to relevant support agencies.

Naturally, whilst underpinned by the same ethos the specific response to homelessness varies from force to force across Wales. This will depend on the extent and scale of the problem as it relates to calls and demand for policing services associated with crime and disorder or concerns for public safety.

For example Cardiff, Newport and Swansea have all developed similar processes to equip police officers and police and community support officers to respond to and deal with individuals who are apparently homeless, with a view to ensuring that the appropriate interventions are put in place to both deal with any criminality and also support those in need.

Often police forces are required to deal with street drinking, drug taking, anti-social behaviour, thefts, and aggressive begging and assaults.

Typical interventions can include using legislation such as the Vagrancy Act 1824 and Section 34 and 35 Dispersal Powers under the Anti-Social Behaviour, Crime and Policing Act 2014.

Importantly, proportionality and necessity are tests which are applied by all police officers before coercive action is taken, providing contact details for outreach services and making referrals to partner agencies are often the primary response of both police officers and police and community support officers.

Police officers are public servants and are deeply concerned about people who are affected by rough sleeping across Wales. The majority of those sleeping rough are doing so as a result of challenging personal circumstances and are amongst the most vulnerable within our community. In many cases they need the protection of the police and other agencies.

If a person, for whatever the reason, is taken into police custody the level of welfare support and care offered to them is substantial and comes under significant scrutiny. Nurses for example are employed within police custody suites across Wales and the Independent Office for Police Conduct scrutinises police actions should any harm come to individuals upon their release from the custody suite.

The majority of policing interactions with members of the homeless community are underpinned by dignity and compassion, focussing on the provision of support and outreach services.

Each police officer across Wales has attested to the fact that they will serve with fairness, integrity, diligence and impartiality, upholding fundamental human rights and according equal respect to all people. The police service is required to keep the peace whilst seeking to prevent all offences against people and property. This at times requires the use of legal powers, but as described above this is not the single response of policing to the challenges posed by homelessness in Wales.

Written Submission to the Equality, Local Government and Communities Committee: Inquiry into Rough Sleeping

Her Majesty's Prison and Probation Service (HMPPS) in Wales is a directorate within HMPPS that delivers offender management services across Wales accounting for the unique delivery landscape in Wales. HMPPS in Wales aims to enable close partnership working between key devolved and non-devolved services in support of our core strategic aims to reduce reoffending, prevent victims and protect the public. This includes ongoing engagement between the Ministry of Justice (MOJ), Welsh Government, Wales Office and other key partners. The Executive Director of HMPPS in Wales is responsible for the National Probation Service (NPS) in Wales, public sector prisons (PSPs) in Wales including HMP Berwyn and has contract management responsibility for the Wales Community Rehabilitation Company (CRC) and private prison HMP Parc.

As at December 2017 HMPPS in Wales manage around 4,270 offenders in custody which will increase to nearer 5,500 as HMP Berwyn reaches its capacity.¹ At any time HMPPS in Wales will supervise over 16,000 offenders in custody or the community.² Earlier studies undertaken for prisons across England and Wales demonstrate the importance of a continued focus and partnership approach to getting individuals into accommodation. In a 2012 study on homelessness in prisoners, 15% reported that they were homeless before entry to custody.³ In 2014/15 approximately 11% of people released from custody had no settled accommodation which is defined as any housing which is permanent independent housing.⁴

HMPPS in Wales welcome the opportunity to provide evidence to the Equality, Local Government and Communities Committee Inquiry into Rough Sleeping. We recognise the significant link between accessing and retaining suitable and sustainable accommodation and desistance from offending. Accommodation is critical in the successful management of risk and harm and in supporting an individual to turn away from crime. This submission will cover the following areas:

- Ministry of Justice Housing Strategy
- The current estate in Wales - Approved Premises and Bail Assisted Support Scheme.
- Through the Gate (TTG) and Resettlement Provision.
- Operational impact of the Housing (Wales) Act 2014.

¹ <https://www.gov.uk/government/statistics/prison-population-figures-2017>

² <https://www.gov.uk/government/statistics/offender-management-statistics-quarterly-july-to-september-2017>

³ Ministry of Justice (2012) Accommodation, homelessness and reoffending of prisoners, London: Ministry of Justice

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/449925/mi-addendum.pdf - Adobe Acrobat Pro.pdf. For a definition of settled accommodation please see p.73.

- Next steps and priorities for HMPPS in Wales.

Ministry of Justice Housing Strategy

HMPPS is an Executive Agency of the Ministry of Justice (MOJ). The UK Government recognises that access to suitable accommodation is an important foundation for supporting an individual to reduce their likelihood of reoffending. Everyone leaving custody should have a safe and suitable home to go to on release. This can provide a stable platform which supports other areas such as accessing health services and gaining employment which contribute further to reducing reoffending.

In November 2016, the MOJ published its Prison Safety and Reform White Paper.⁵ The White paper outlined several areas that the Government intended to address, including improving accommodation outcomes for offenders released from prison. Overcoming the many barriers offenders face to securing suitable accommodation is something that MOJ cannot do in isolation and a partnership approach with Ministry of Housing, Communities and Local Government (MHCLG) and Welsh Government will deliver joint strategies to improve access to housing for those being released from prisons in England and Wales. This work will build upon existing support for those at risk of homelessness and develop pilots to support offenders to access and sustain tenancies on release from prison.

The current estate – Approved Premises and Bail Accommodation and Support Services.

Approved Premises

HMPPS in Wales have four Approved Premises (APs) in Wales (Bangor, Ruabon, Cardiff and Swansea). Each have 23 to 26 beds for male offenders. APs are a vital resource, providing enhanced monitoring and control for male offenders who are predominantly prison leavers and assessed as posing a high risk of causing serious harm. An AP is an environment which encourages successful reintegration back into communities, supports public protection and opportunities for rehabilitation. A priority for HMPPS in Wales is to increase the provision of AP places in Wales to meet the demand requirements.

It is recognised that APs are temporary placements and Local Authorities must work with offenders during their placement to prevent homelessness on release; usually through Multi Agency Public Protection Arrangements (MAPPA). HMPPS in Wales work closely with Welsh Government and on a regional basis through MAPPA Coordinators to engage with Local Authorities to prevent homelessness of high risk offenders and to reduce the risk they pose to the public.

Bail Accommodation and Support Services (BASS)

The MOJ provides suitable temporary accommodation for individuals on Bail, Home Detention Curfew, Additional License Cohort through the contracted-out Bail Accommodation and Support Services (BASS). BASS operates across England and Wales and is currently delivered by Stonham. This contract is due to end in June 2018 and there is a new tender process underway. The service is provided for offenders

⁵ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/565014/cm-9350-prison-safety-and-reform-_web_.pdf

on Bail, Home Detention Curfew and Additional License Cohort for medium to low risk offenders.

The Additional License Cohort includes:

- Offenders leaving prison custody having served a sentence of less than four years who do not have accommodation on release. They must also meet the BASS eligibility criteria on risk.
- Places can also be offered to offenders on license in the community who are at risk of recall due to the loss of suitable accommodation. They must also meet the BASS eligibility criteria on risk.

There are currently ten properties in Wales which offer a total of 31 bed spaces. There are six beds for female offenders and 25 for men. The provider is able to change this ratio dependent on demand.

Through the Gate and Resettlement

As a result of the Offender Rehabilitation Act (ORA) 2014 all adult prisoners can access 'Through the Gate' (TTG) resettlement services. This is a tailor-made package of support which starts with the individual on entry to custody and is continued in the last 12 weeks before release. This service aims to make sure that offenders are located as close to home as possible and includes addressing offenders housing and accommodation needs.

The Wales CRC deliver TTG services across all prisons in Wales apart from HMP Usk. To make sure that Welsh women in custody in England are appropriately supported through their resettlement, The Wales CRC also deliver in HMP Eastwood Park and HMP Styal where a number of Welsh women are held.

Operational impact of the Housing (Wales) Act 2014:

To manage the operational impact the Housing (Wales) Act 2014, particularly the change in priority status for prison leavers, the Prisoner Accommodation Resettlement Working Group (PARWG) was established. It was a multiagency group chaired by Welsh Government of which HMPPS in Wales were integral. Other members included the Wales CRC, Welsh Local Government Association (WLGA) Homelessness Network, Local Authorities, HMP Eastwood Park and key voluntary sector organisations.

The groups' remit was to ensure that Welsh prison leavers benefitted from the same preventative approach to homelessness as citizens within the community and to minimise the risk of homelessness for prison leavers. There were a number of positive outputs including:

- Publication of the National Pathway for Homelessness Services to Children, Young People and Adults Leaving in the Secure Estate.
- Jointly created information leaflets and posters for prisoners, disseminated across all prisons in Wales and key prisons in England (where population of Welsh prisoners were highest,) printed by HMP Parc's printing press.
- Jointly created leaflets for private landlords to encourage the housing of prison leavers.

- The National Probation Service and Welsh Government delivered joint training events on the Act and the National Pathway process across Wales for National Probation Service Community Rehabilitation Company, prison and LA staff.
- Wales Community Rehabilitation Company co-produced the Through the Gate 'good tenants' group work intervention with Welsh Government to equip prisoners with the necessary skills to secure and maintain tenancies.

Welsh Government, HMPPS in Wales and others worked extremely closely to develop The National Pathway for Homelessness Services to Children, Young People and Adults Leaving in the Secure Estate, launched in December 2015. This has been key to supporting the operational implementation of the Housing (Wales) Act 2014. The associated guidance clearly outlines the roles and responsibilities of each organisation involved and how they should interface to prevent homelessness on release. The PARWG oversaw the implementation of the Pathway and the group has been paused to await the outcome of independent research on the Pathway's effectiveness.

The Pathway is accompanied by additional resources to support its delivery. Welsh Government has funded Prison Link Cymru which provides support services for short-term prisoners on entry to custody alongside The Wales CRC. This can help prisoners to retain their tenancies and/or maintain housing benefit claims to avoid risk of homelessness on release. Where this is not possible Prison Link Cymru support prisoners to relinquish their tenancies and/or claims to avoid debt which may act as a barrier to securing housing on release.

Welsh Government and HMPPS in Wales also continue to fund an Accommodation Pathway Officer which is a unique post in Wales. This post has enabled us to:

- Establish and chair regional Prisoner Accommodation Resettlement Groups across Wales.
- Carry out regular deep-dive exercises, comparing records held by HMPPS with Local Authority records to determine if the Pathway process is being followed and to overcome any identified barriers.
- Continue to roll out multi-agency training to support criminal justice and Local Authority staff on collaborative working.
- Support close local partnership working and intervene in critical or complex cases to prevent homelessness where possible.

The emphasis of the Pathway is to minimise the use of emergency accommodation through prevention and partnership working. There are, however, occasions where accommodation is not secured prior to an offender being released. All prisoners released in Wales are supervised by either the NPS or The Wales CRC and in cases where an individual is a rough sleeper all steps will be taken to best support that individual to find suitable accommodation. This includes securing temporary emergency accommodation, referrals to the Local Authority and additional services offered by The Wales CRC to support individuals back into stable accommodation.

Next steps and priorities for HMPPS in Wales:

As we have outlined there is a lot of good work and progress in relation to the provision of housing and appropriate support for offenders. However, we understand how critical sustainable accommodation is not only for offenders in Wales but also their wider network including family, dependants and significant others.

HMPPS in Wales have commissioned an Accommodation Project as part of a broader internal programme of change and improvement across the directorate. An Accommodation Steering Group has been established with representation from Welsh Government and other partners to support the direction and implementation of this project. This project is progressing:

- Working with the MOJ to make sure devolved differences and ways of working are reflected in the Housing Strategy.
- Reviewing internal and external partnership arrangements through the National Pathway to ensure its effective and successful operation across HMPPS in Wales.
- Learning from best practice interventions across Wales and the UK to support the development of accommodation solutions that build capacity and supply of housing for offenders.
- Building and developing relationships across social housing and the private rental sector.
- Increasing AP provision including the exploration of virtual APs in partnership with Local Authorities. This includes accommodation for women and their dependents resettling in Wales.
- Exploring options for integrating offender employment opportunities and Welsh Government's aims to increase housing across Wales.
- Reviewing and implementing any potential recommendations for HMPPS in Wales as a result of the forthcoming independent evaluation of the Pathway.
- Understanding the impact of the Welsh Government Rough Sleeper Count Report due for publication this year.

HMPPS in Wales look forward to the outcome of this important enquiry. We remain committed to working collaboratively with our partners to improve accommodation outcomes for all our offenders and to minimise the risk of homelessness.

Wales Community Rehabilitation Company (CRC) was formed on 1 June 2014 as part of the government's reform of probation services. The CRC provides rehabilitation and offender management services to help reduce reoffending and protect the public across Wales.

We work with low and medium-risk offenders, managing their community sentences and providing them with knowledge, skills and support to enable them to stop offending.

In addition we also manage and support low and medium-risk offenders who are released from prison on license, including offenders who are sentenced to less than 12 months in custody.

We work closely with the National Probation Service (NPS) which was created at the same time to manage high-risk offenders, advise courts on sentencing and work with victims. We also provide rehabilitation interventions to some high-risk offenders managed by the NPS.

Each year Wales CRC supports around 10,000 adult service users.

Wales CRC is operated by Working Links who were formed in 2000 to help people with often complex needs to enable them to create better futures for themselves and their communities.

Identifying potential housing issues which could lead to homelessness

Our Service Users (SU) face a number of challenges on accommodation which can lead to rough sleeping. For example, those who are sentenced to custodial sentences may not be able to return to the property they previously lived in.

Wales CRC runs Through the Gate services (TTG) within Welsh prisons and within Eastwood Park where the majority of Welsh females serve their prison sentence. Our teams see all prisoners (both NPS and CRC whether sentenced or on remand) across Wales within five days of the initial assessment by prison staff. At this stage we can identify potential homelessness issues as well as activity which would help sustain them in accommodation. Such activity can include referral to services such as Prison Link Cymru (a Welsh Government funded provision) who offer advice and support in order to sustain people's housing benefit while they are in custody on short term sentences so that the property can be available on release.

The TTG team also interview prisoners 12 weeks before release, and again at 7 days before release and provide an updated resettlement plan to the probation Offender Manager (OM). If accommodation is identified as an issue, the TTG officer will complete a housing referral, supported by a risk assessment completed by the OM. This process, while not in itself securing housing, does ensure that the Homelessness Department of the Local Authority has initial information to enable a priority need assessment to be completed. On the day of release the service user is directed to report to local housing.

Additionally, we discuss our service user's circumstances during our regular appointments, including their accommodation needs and will record any changes in circumstances. We support those with difficulties through advice and signposting to local services and support agencies when we hear they are in difficulties.

We work with Justice Cymru, a pan-Wales consortium of expert housing providers, commissioning support for our service users as part of our supply chain. Justice Cymru is a joint initiative

operated by Gwalia, The Wallich and Clwyd Alyn. Any service user who is homeless or at risk of homelessness can be referred to Justice Cymru who will provide bespoke provision and support through direct delivery and through their extensive network of community partners and provisions. We have made more than 2,700 referrals to Justice Cymru. The services includes:

- A clearly defined process and structure that assess offender housing and wider support needs and identifies solutions to these accommodation based concerns
- Plan and document the clearly defined support including intended actions and outcomes to be achieved which ensures maximisation of or opportunities through statutory services, RSL's and community services.
- Deliver the agreed package of support, whether that is a combination of face-to-face interventions such as one to one advice or group workshop delivery or virtual via phone, skype etc., or activities completed on behalf of the offender
- Structured review of progress including service user feedback and the evaluation of agreed outcomes

1. The causes of rough sleeping and of the apparent recent increases in rough sleeping

- a) As of today (31 January 2018) our data confirms 635 SUs are homeless, 88 of these are described as rough sleeping. We are currently unable to say which of our SUs are reoffending as the Authority currently does not share the data from the Home Office database (PNC data) that it bases its reoffending data on. We can anecdotally say those that fall out of contact with us are more likely to offend.
- b) Our OMs report increasing difficulties for service users to access accommodation. We signpost our service users to support available in the local area and will discuss the issues service users are facing as part of our probation service.
- c) Offenders are no longer designated as priority groups for Local Authorities to house except where there have diagnosed health issues including mental health. This does make it harder to find accommodation. In addition our SUs can have additional problems which result in added difficulties when it comes to finding landlords willing to accept them as tenants, including issues with drugs and alcohol. As part of our TTG service we have developed a module on how to be a good tenant, however at times there are difficulties delivering this widely in prisons due to difficulties accessing prisoners because of well documented staffing issues which can result in prisoners being confined to their cells.
- d) We inform the Local Authority homeless persons unit when a service user is being released with no accommodation. The Local Authority might see them on the day of release but they are not able to hold accommodation for an individual until that person is released due to the risk that the person may not turn up or may subsequently decide to stay with someone they know. This creates a problem guaranteeing there will be accommodation available to those who need it on release.
- e) One consequence of short term sentences, or following recall to prison, can be that individuals lose their accommodation and belongings. This can also affect their connections to their support network, affecting their ability to sofa surf until more permanent

accommodation can be found. Without accommodation service users are more likely to drop out of contact with probation services, leading to further recalls.

- f) Service Users are released on Fridays if their due date for release falls on a weekend. This means it is more difficult to find emergency accommodation when it is needed and can result in rough sleeping when there is no place available.
- g) Private landlords can be unwilling to accept individuals claiming Universal Credit due to the six to eight weeks lag before receiving a rent payment. Anecdotally, we hear suggestions they are also concerned about whether they will receive the rental payment at all as it goes directly to the individual, not the landlord.
- h) When Service Users become homeless they can then find it difficult to maintain their appearance as they struggle to find places to shower and clean clothes, compounding the problem of finding accommodation and leading to long periods of rough sleeping.

2. The effectiveness and availability of services including emergency accommodation

- a) Our OMs report an increase in the number of service users who are sleeping rough. Services vary across Wales. We are aware of emergency accommodation in Cardiff for example but other areas may have none. Where it does exist it may be seasonal and limited to the winter months. Availability is often on the basis of first come, first served, leaving some without a place.
- b) The temporary accommodation which is available may not be suitable, with service users unwilling to stay if they fear for their safety or there is a prevalence of drug use. This is particularly the case in some larger hostels.

3. The steps to prevent and tackle rough sleeping in Wales

- a) Each LA will have a single gateway for accommodation issues. In addition there are a number of joint agency meetings where issues of homelessness can be raised, including:
 - Safeguarding boards (children and adults) which are regional collaborative committees specifically focused on housing
 - Regional collaborative committees specifically focused on housing
 - Supporting people: Regional collaborative committees
 - Public service boards

- b) Our OMs suggest rough sleeping could be reduced through:

- An increase in hostel accommodation so that there is wider availability across Wales and people are not released from prison with no available accommodation.
- More dispersed accommodation for SUs so that SUs are not grouped together in large hostels
- Greater availability of LA accommodation
- Increased availability of bond schemes. Universal Credit is a challenge for our SUs due to the potential delay in receiving a first payment. In addition many SUs have a limited ability to budget. Bond schemes, where a guarantor undertakes to pay the rent due to a landlord in the event the tenant does not meet the payment could help secure accommodation, particularly by opening up more private accommodation.
- Wider use of release on temporary licence for suitable candidates where accommodation is identified to avoid the additional risk of being immediately homeless when released on a Friday.

We thank you for the opportunity to submit evidence, and look forward to answering your questions on the 8th February.

Agenda Item 7.1

Rebecca Evans AM
Y Gweinidog Tai ac Adfywio
Minister for Housing and Regeneration

Y Pwyllgor Cydraddoldeb,
Llywodraeth Leol a Chymunedau
Equality, Local Government
and Communities Committee
ELGC(5)-05-18 Papur 15 / Paper 15

Eich cyf/Your ref P-05-790
Ein cyf/Our ref RE/05161/17

David John Rowlands AM
Chair - Petitions committee.
National Assembly for Wales
Cardiff Bay
CF99 1NA

government.committee.business@wales.gsi.gov.uk

9 January 2018

Dear David,

Thank you for your letter of 12 December regarding petition P-05-790 Tackle Rough Sleeping. The petitioner has suggested a number of possible actions which they believe are needed to address the apparent increase in rough sleeping.

We believe that no person should need to sleep rough. Recent increases in rough sleeping are a concern for both myself and for my Government colleagues, and addressing this issue is a priority. The causes of rough sleeping involve personal and structural factors, which often interact. Employment and welfare benefit problems can make the context very difficult for people on low incomes. These issues are often compounded by personal problems such as ill health, substance misuse and criminal behaviour.

Outreach and other services for rough sleepers have increased over recent years, but access to emergency accommodation remains inconsistent. My officials are working with partners in local authorities and the voluntary sector to target areas where there are shortages of services. The draft budget highlights our commitment to tackle this issue. We know that some rough sleepers become entrenched in sleeping rough, and may become unwilling to try better alternatives for a number of complex reasons.

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Correspondence.Rebecca.Evans@gov.wales
Gohebiaeth.Rebecca.Evans@llyw.cymru

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.

We agree there is a need for better monitoring data and have funded the Wallich to develop a national continuous monitoring system. We are also funding a rough sleeper network co-ordinator post to design and roll out the new system and share best practice across Wales. This new system will provide quantitative data and information regarding a person's use of services over time.

I also agree that services should be tailored to meet individual's needs, and this can only be achieved by listening and understanding an individual's experience and future aspirations. Research being undertaken by Shelter Cymru to understand the reasons why people are finding themselves with no accommodation is supported by Welsh Government. The primary objective of the project is to learn about the experiences of people on the streets and their opinions of what would have prevented their homelessness. This research is being carried out in Wrexham, Cardiff and Swansea. I expect to receive the findings of this research in April 2018.

The petitioner has proposed a 'no rough sleeping policy'. Our policy position is that no one should need to sleep rough. I support the petitioner's suggestion on long term accommodation. The Welsh Government is supporting 'Housing First' projects across a number of areas, including Cardiff, which will help rough sleepers move into settled accommodation and ensure support is available to help them maintain their tenancy. We will monitor closely the progress and impact of these projects.

I do not support the assertion that our legal reforms are not helping homeless people in general. The duties owed to an individual within the Housing Act (Wales) 2014, for homeless people and those threatened with homelessness are consistent. Local Authorities must take reasonable steps to help to prevent homelessness and to secure accommodation where needed. This enables most people to avoid homelessness and the need to sleep rough. However, I recognise that practice at a local level does vary, and may not meet the complex needs of many rough sleepers. The petitioner raises excellent points regarding austerity and welfare cuts. These areas are non-devolved. We recognise the shortage of affordable housing and we have committed to delivering 20,000 affordable homes over the Assembly term.

I am aware of concerns over conditions in some emergency accommodation. In the summer of 2017, the former Cabinet Secretary for Communities and Children announced an additional £2.6 million to tackle homelessness. This funding has been allocated to local authorities who are using it to fund a range of initiatives, including capital investment to improve the quality of emergency provision in Newport, Cardiff and Wrexham. As previously mentioned, we are also committing revenue funding to further develop Housing First style approaches to help rough sleepers into settled accommodation.

In addition to the work we are undertaking we are also planning for the future. Officials are working with partners to develop a national action plan to tackle rough sleeping which will address the issues raised by the petitioner. This action plan will be based on the recommendations of the Rough Sleepers Working Group. I expect this plan to be published during February and to outline developments taking us into January 2020. The Rough Sleeper Action plan will be forwarded on to the committee once finalised.

This information evidences our firm commitment to tackling rough sleeping.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The script is cursive and fluid.

Rebecca Evans AC/AM
Y Gweinidog Tai ac Adfywio
Minister for Housing and Regeneration

John Griffiths AM
Chair, Equality, Local Government and Communities Committee
National Assembly for Wales
Tŷ Hywel
Cardiff Bay
CF99 1NA

XX Month 2018

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau
Equality, Local Government and Communities Committee
ELGC(5)-03-18 Papur 16 / Paper 16

Dear John

P-05-790 Tackle Rough Sleeping

The Petitions Committee has been considering the following petition from Hanin Abou Salem, which was submitted with 71 signatures:

Petition text:

We're calling on the Welsh Government to tackle rough sleeping in Wales. A devolved government is a "government closer to the people," all the people! I recently moved to Wales and I have fallen in love with everything Welsh. But every day my happiness is mixed with immense sadness because I pass so many people sleeping rough in the streets. Their ongoing misery is an affront to my humanity. As an individual I cannot solve their problem on my own but together as a government and people we can make a difference. The homeless people I pass every day in Wales have indicated that they feel like "forgotten people". They live in a vicious circle which can only be broken if the government sets a clear strategy to get them off the street and into a safe accommodation so they regain their lives. About 2 weeks ago I passed a homeless



person and someone commented that individuals sleeping rough want to be homeless. As I was arguing against this logic we passed a homeless man near city road reading a book!

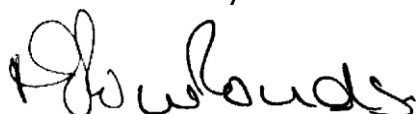
No one chooses to be homeless. People become homeless as a result of certain circumstances and the government has a duty to get people off the street so they can be active citizens who can live with dignity, have access to work opportunities and be able to vote. The Housing Act (Wales) 2014 required all councils in Wales to help anyone at risk of becoming homeless within 56 days does not solve the problem of individuals who are already homeless and sleeping in the streets. We need to address rough sleeping now!

The Petitions Committee considered the petition most recently on the 23 January 2018 when Members agreed to make the Equality, Local Government and Communities Committee aware of the petition, given your current inquiry into rough sleeping in Wales. We would be grateful if you could notify the clerking team at SeneddPetitions@assembly.wales once your report has been published so we can forward a copy to the petitioner.

Further information about the petition, and the Committee's consideration of it to date, is available here:

<http://www.senedd.assembly.wales/mgIssueHistoryHome.aspx?IId=20204>

Yours sincerely



David J Rowlands AC/AM
Cadeirydd/ Chair



Army

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau
Equality, Local Government and Communities Committee
ELGC(5)-05-18 Papur 17 / Paper 17

Present at the visit:

Emma Paynter (Service Manager); David Jenkins (Bridge/Compass Programme Coordinator); Cath Docherty (Outreach Programme Coordinator); Yvonne Connolly (Regional Manager); service users, including from the Bridge Programme.

Overview of services provided

The services provided by the Salvation Army in Cardiff include:

- Northlands, a centre which works with young homeless people.
- The Bridge Programme, **an 18 month residential preparation, detox and aftercare facility for homeless adults** which works in partnership with Cardiff Addictions Unit. It's the only project of its kind in Wales that has residential funding.
- Ty Gobaith Lifehouse, a hostel aimed at resettling people into the community, which is accessed via a local authority assessment and referral. Individuals referred to the hostel stay for an average of six months.
- The Compass Project, which is a 4 bed project aimed at housing the most entrenched rough sleepers who often will not go inside and find it difficult to engage with services. They **provide high level support with two staff to four residents** and use a trauma recovery model which works around the premise that people who have been through trauma will neurologically function very differently and will need a far higher level of support and flexibility. There is currently no timeframe for individuals in this project. It's a pilot, funded by an innovation grant.

- The bus project which runs Sunday–Thursday, 18.30 – 8.30, 52 weeks a year and is part of the street outreach work, focussing on building relationships with rough sleepers. **The service has a 98% success rate of getting individuals into emergency accommodation or gaining access to the health services they require.** Future aims for the project include providing support for addiction and housing applications on the bus. The project workers emphasised the importance of first impressions for building effective relationships with rough sleepers.
- The reconnection service, for individuals who don't have a statutory connection to the city, which looks to support them back to their family, if possible. **Some individuals, including those who have been transient between sleeping rough and prison, don't have family or a local connection at all,** but wish to remain in Cardiff, and so project workers may work with the person and contest local authority decisions to move them on.
- The Housing First pilot, **aimed at breaking the cycle of homelessness** working direct with rough sleepers to provide an immediate long term housing solution to people experiencing rough sleeping with the option of intensive, assertive and flexible support to maintain tenure of property and stability in independence.
- Partneriaeth – A Community prevention programme, working with over 300 people and families in the community who are at risk of becoming homeless focussing on prevention of homelessness, community sustainment and independent living. The service is accessed via a referral from a local authority or other relevant agency.

The services are not solely based on providing accommodation, but on the often complex needs of individuals, for example the Bridge detox programme. Some are only accessed via a referral, whereas the outreach services have open access. Project workers highlighted that **outreach work is key,** due to some rough sleepers feeling unable to try and access services and accommodation such as the Salvation Army provide.



What could be done differently? What are the obstacles to supporting rough sleepers?

Limited funding and instability in funds is a key obstacle. Some of the Salvation Army's funding streams are limited, and some are pending a commissioning process. Better access and stability of funds would be preferable. This also impacts on staff resources, which project workers noted were insufficient. While being asked to make cost savings, there is higher demand for services. The Salvation Army have had to supplement funding from grants/commissioned services with its own resources.

Frequent changes to the benefits system (including Universal Credit, local housing allowance, reductions to benefits for the under 25s) by the Department for Work and Pensions is a contributing factor to this instability within the sector.

Limited access to treatment for service users, and the length of time it takes to gain access to the appropriate treatment, particularly mental health services, primary care and substance abuse support. One service user in the Bridge programme had a 14 month wait to access any mental health services, and has been waiting over 18 months to see the specialist consultant for their needs. Service users and project workers discussed that it's easier for some individuals to access mental health services than others, e.g. if they are known to services previously, compared with those without a local connection, or have recently been released from prison. Project workers feel that this could be improved through designated access and guidance for organisations like the Salvation Army to the treatments required to support individuals.

It was noted that **access to support for existing Salvation Army service users compared with individuals sleeping rough is very different,** as project workers are able to work with their service users for referrals to appropriate treatment. Project workers noted that **the majority of individuals sleeping rough have lost all trust in public services** by the time they come to use the services at the Salvation Army.

Service users discussed the **mental health issues which are often masked during times of alcohol and drug abuse,** and therefore begin to surface during sobriety. This included depression, personality disorders, post-traumatic stress disorder (PTSD) and schizophrenia. It was discussed how **accessibility to the appropriate services and treatment is a constant obstacle for the service users,** and sometimes they are unable to sustain accommodation without having the appropriate support. An example was



given of an individual in the Compass project, who had been sleeping rough long term due to a traumatic background, which included over thirty foster placements. The individual to-date hadn't been able to access any mental health services despite being known to CAMHS since childhood.

Reasons for the increase in rough sleeping

Project workers noted that **rough sleeping has increased**. It was discussed that the narrative to explain the increase in rough sleeping and demand for services is complex – there isn't a single reason for the increase, and personal viewpoints of the individuals should be taken into account. It was discussed that **there are no quick solutions** for people living on the street long term, and that the issues that contribute to homelessness often start at a very young age, e.g. adverse childhood experiences, trauma.

Project workers discussed that **the sector is financially and socially unstable**, without growth, and workforces are continuously threatened with cuts and change. Tenders regularly stipulate that cost savings are required, despite the increasing demand. One project worker noted that **the sector needs leadership values**.

Services that support rough sleepers need to be tailored towards their complex needs, and need to provide tangible changes such as accommodation, long-term counselling, and trauma work.

Project workers discussed that individuals sleeping rough will sometimes commit crimes out of desperation, for the accommodation and limited support that's provided in prison. However any support is lost once the individual is released from the criminal justice system. One service user noted that their probation officer recognised their mental health issues and has organised for them to see a Community Psychiatric Nurse, but other public services haven't recognised the individual's needs.

Project workers discussed that establishing the number of rough sleepers who have experienced an intentionality decision by councils (for example in relation to housing) would give an insight into whether it's a factor in causes of rough sleeping.



Inquiry into rough sleeping in Wales: visit to Solas Cymru, Clarence Place Complex Needs Scheme, Newport

Date: Wednesday 17 January 2018

Attendees: John Griffiths AM, Jenny Rathbone AM, Megan Jones (Researcher), Liz Wilkinson (Clerk), Kirsty Thomas (Manager, Solas Cymru), Lisa Chantler (Lead Project Worker, Solas Cymru), Ben (resident at Clarence Place) and Amanda (resident at Clarence Place)

Background

Solas Cymru provides a broad range of services for people who are vulnerable, homeless or at risk of homelessness, including accommodation based services, floating support services, alcohol and treatment services and family support services. It works towards providing individuals with as many opportunities as possible to access permanent settled accommodation.

Clarence Place Complex Needs, where the visit took place, provides supported housing for 26 people aged over 18 via its accommodation scheme and 6 self-contained flats attached to the scheme. Support is provided to people with longer term mental health or substance misuse challenges. The staff team specialises in working with complex needs and in working closely with other agencies to develop transition plans for each person to work towards independent living.

Many of those accessing the Clarence Place scheme have experience of rough sleeping, either in the short term, or for extended periods.

Other accommodation schemes provided by Solas Cymru in Newport include a direct access scheme in Albert Street and self-contained bedsits and flats for individuals and families who are at risk of homelessness in Clifton Place.

Key issues raised during discussion

Referrals – staff explained that individuals (including rough sleepers) were referred to Solas Cymru through the Supported housing gateway (a point of access for temporary or short-term housing for homeless people with housing related support needs) run by



Newport City Council. These are 'at risk' individuals with mental health and substance misuse challenges who would be unsuitable to house in temporary accommodation.

Solas Cymru currently has 23 individuals on its waiting list for Clarence Place, although staff emphasised that this figure was not indicative of the amount of referrals they receive. Staff reported that when a vacancy becomes available individuals who are considered most 'at risk' are prioritised.

Who sleeps rough and why – staff reported that, in their experience, rough sleeping was not as a result of a lack of affordable housing and those who sleep rough were not doing so because they were unable to find a home. Staff emphasised that rough sleepers generally have multiple and complex needs, particularly in relation to mental health and substance misuse, which make it difficult or impossible for them to live independently and in settled accommodation.

Staff reported that there were some individuals for whom rough sleeping was a lifestyle choice, although they emphasised that these were in the minority. These individuals may not be willing or feel able to engage with services.

Staff explained that some individuals who had chosen to leave Solas and return to the streets went on to access emergency support (night shelters) for 'respite', most commonly in the winter months. Staff were of the view that night shelters may be perpetuating this pattern of behaviour and, as such, were not necessarily part of the solution.

Staff provided examples of previous residents who had chosen to return to the street once they were in receipt of welfare benefits. Staff reported that the reason for this was that individuals were unwilling to pay the £25 per week service charge, and that they could make more money through begging than they received through welfare benefits.

12 residents had left the Clarence Place Complex Needs Scheme in the last 12 months.

Ben and Amanda (residents at Clarence Place) explained that they had first slept rough following breakdowns in relationships (either with family or a partner).

Staff and residents highlighted that some emergency, temporary accommodation would not accept dogs. They emphasised the importance of the relationship between



some rough sleepers and their dogs. For these individuals, this relationship was paramount and they would rather sleep rough than be separated from their dog.

Staff reported that rough sleepers who are drug and alcohol users were unable to access certain emergency, temporary accommodation, for example night shelters.

Support needs – Staff explained that individuals at Clarence Place have a range of support needs, with many having multiple and complex needs. For example, mental health conditions, including psychosis and personality disorder; alcohol misuse; drug misuse, including crack cocaine. They also explained that some individuals had experienced serious trauma, including childhood abuse and domestic violence.

Staff reported that some residents, even after making significant progress and positive changes, required specialist, intensive support and may need to remain in supported accommodation permanently. These individuals were unlikely ever to be able to live independently and maintain a tenancy, even with ‘floating support’.

Outcomes – Staff emphasised that, the intensive support services provided at Clarence House can transform the lives of individuals with the most complex needs. They gave an example of one resident who had a history of serious alcohol abuse, who had experienced trauma including childhood abuse and multiple family bereavements. After 8 months at Clarence House she had made significant progress and had stopped drinking.

15 residents had moved into settled accommodation within the last 12 months.

While staff reported many positive outcomes, they also reported that there had been three alcohol related deaths in the last 12 months. They explained that these individuals had a history of significant alcohol misuse, with some choosing it as a lifestyle and not necessarily wanting to recover.

Funding – Clarence Place is funded through the Supporting People Programme Grant. Staff raised concern about the Welsh Government’s proposal to merge the Supporting People Grant with other grants, in particular the impact on funding available for schemes to support the most vulnerable.

Case study 1



Ben is 25 years old and has been at Clarence House for two years and three months. He currently lives in one of six self-contained flats provided through by Solas' accommodation scheme in Clarence Place.

Ben was in foster care as a child and went on to live with his uncle. When his relationship with his uncle broke down he became homeless and was sofa surfing with friends. Ben was unaware of the support that was available to him and eventually ended up on the street. He slept rough for several months. Ben was unable to access some emergency accommodation because he had a dog; a long-term companion, and would not be separated from it. Ben's relationship with his dog was clearly of immense importance to him.

Ben was told about the Wallich breakfast run by other rough sleepers and regularly accessed this service, which was invaluable to him. He found Wallich staff supportive and non-judgemental.

Ben found the day time particularly difficult and having nowhere to go and nothing to occupy his time exacerbated his anxiety. He would look forward to the night time when he could find a suitable place to settle, albeit on the street.

Eventually, Ben stayed at a short stay hostel and was encouraged by staff to go to Clarence Place.

Ben suffers from psychosis and had been sectioned 17 times before moving to Clarence Place. Since receiving support at Clarence Place he has had one psychotic episode, which resulted in Ben being sectioned.

Ben has recently passed his driving test and is hoping to save for a car. He is also keen to decorate his flat.

Case study 2

Amanda is 33 years old and has lived at Clarence Place for 2 years and 2 months.

Amanda has two children who live with family members but who, since receiving support from Solas, she now sees regularly.

Following a relationship breakdown Amanda served approximately 12 months in custody. She returned to the family home on release from prison, but felt it was



impossible to remain there given the particular circumstances surrounding her relationship breakdown. Eventually she left the family home of her own accord.

Amanda's alcohol misuse escalated when she became homeless and led to significant behavioural problems, which meant that she was known to the police.

Amanda slept rough in an empty building next to Solas at Clarence Place for approximately 4 months. This building was used by other rough sleepers who she did not know. She was particularly at risk when she had been drinking, which she often did in order to help her sleep and suppress her paranoia.

Amanda has made significant positive changes following support from Solas, including addressing her alcohol misuse. She has recently been granted additional priority for local authority housing and is hoping to move into permanent social housing soon. Amanda is looking forward to having her children live with her when she moves into her own home.



Agenda Item 7.4

Date/ Dyddiad:

Please ask for/ Gofynnwch am:

Direct line/ Llinell uniongyrchol:

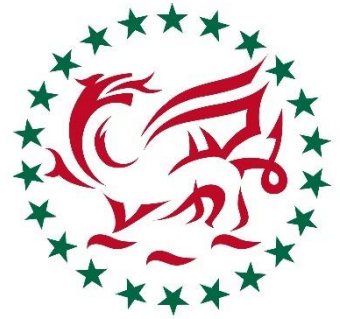
Email/ Ebost:

23rd January 2018

Daniel Hurford

029 20468615

daniel.hurford@wlga.gov.uk



CLILC • WLGA

John Griffiths AM

Chair

Equality, Local Government and Communities Committee

National Assembly for Wales

Cardiff Bay

Cardiff

CF99 1NA

Y Pwyllgor Cydraddoldeb, Llywodraeth Leol a Chymunedau

Equality, Local Government and Communities Committee

ELGC(5)-05-18 Papur 18 / Paper 18

Dear John,

Follow up Note on Public Services Ombudsman (Wales) Bill

Thank you for the recent invitation to give evidence on the Public Services Ombudsman (Wales) Bill. As requested, please find following further information in relation to specific questions raised during Committee.

- **Provisions in the Bill for own-initiative investigations in relation to the implications of whistleblowing;**

As noted in our written evidence, the WLGA is supportive of the proposed powers for own-initiative investigations. The Ombudsman has made the case that this would also allow him to investigate concerns in response to a whistle-blower as well as from a complainant. The Ombudsman is already a 'prescribed person' under the [The Public Interest Disclosure \(Prescribed Persons\) Order 2014](#), although the complaints he is currently able to act upon are limited to code of conduct complaints about members of local authorities.

A broadening of 'matters' that the Ombudsman could consider within the 2014 Order would enable him to use own initiative investigatory powers more widely and to include concerns raised via a whistleblower, which the WLGA would support. The provisions for own initiative investigations in Section 5 are appropriate, but as noted during the Committee session, these could be clarified further if they were set within a clear decision-making framework (similar to the model developed by the Northern Ireland Ombudsman). Furthermore, Sections 65-67 should prevent duplication of whistle-blowing investigations as the Ombudsman must consult with 'specified persons', including other regulators, Commissioners or the

Steve Thomas CBE
Chief Executive
Prif Weithredwr

Welsh Local Government
Association
Local Government House
Drake Walk
CARDIFF CF10 4LG
Tel: 029 2046 8600

Cymdeithas Llywodraeth
Leol Cymru
Tŷ Llywodraeth Leol
Rhodfa Drake
CAERDYDD CF10 4LG
Ffôn: 029 2046 8600

www.wlga.gov.uk

Auditor General for Wales, many of whom are also ‘prescribed persons’ with regards whistleblowing.

- **Telephone service provided by local authorities for oral complaints, and the proportion of oral complaints made to local authorities, if available;**

Following the Committee session, I have received feedback from most local authorities with regards the above question. All authorities accept oral complaints, as previously noted, however not all authorities record how or in what medium complaints are received, of those that do record how complaints are received, the percentage that are oral complaints varies from 12% to 40%.

Of the authorities that responded to my request, complaints phone numbers are local call rates (which appears to be the case also for the Ombudsman’s office, the National Assembly for Wales and the Local Health Boards). All confirmed that they offer a ring-back option if requested by a complainant. Some authorities confirmed that that provide a free-phone service for children’s complaints.

- **View on the financial implications of and liability for investigations of complaints, in the context of a public/private pathway.**

The WLGA’s written evidence noted that ‘although not a local government matter, this proposal appears appropriate.’ During Committee, the WLGA was asked:

“...where there's a need to investigate a private health service provider—it could apply to local government...—that cost shouldn't be borne by the public sector; it should be borne as a matter of course by the private body. Is that something you'd agree with? Social services might have elements that go over in terms of care packages to the provider.”

Within the context of the Bill itself, the proposed extension of the Ombudsman’s powers over private health services is limited to allow the investigation of complaints in a public/private health service pathway rather than a power to investigate private health providers more broadly.

Section 10(2) therefore provides a check on the power to investigate private health services and the Regulatory Impact Assessment estimates that the anticipated use of the power would be infrequent and therefore costs to the Ombudsman or taxpayer would be limited.

We note that the Explanatory Memorandum estimates the annual cost to the Ombudsman of this new power at only £3,507. In his oral evidence to Committee, Simon Thomas AM, Chair of the Assembly’s Finance Committee previously explained:

“...even the Finance Committee wasn't convinced that this was a big enough sum to have some kind of complex levy system or some other way of raising costs, but that this was a small enough sum to be dealt with in the overall work of the ombudsman's envelope, if you like.”

As this proposed reform (and potential for powers of cost recovery) was narrowly defined to the public/private health service pathway, local government has not considered in detail the scope for broadening this power more widely to private sector providers delivering other public services.

Local authorities commission services from a range of providers, some of whom may be third sector bodies or private sector suppliers. General feedback however suggests that any complaints received about local authority services (delivered by a third party, including the private sector) are generally dealt with by the local authority as a complaint against the authority (just as they would be were those services delivered in house). Local authorities therefore would not normally seek to recharge internal investigation costs to private sector providers where such complaints are upheld. These bodies however may be expected to cover the costs of/provide any redress or remedial action and complaints that led to significant or systemic concerns would be addressed as part of any contract management arrangements.

Notwithstanding the above however, the Bill does propose a new power for the Ombudsman to 'demand or recover costs' from private health service providers in specified circumstances, for example where the private health care provider has obstructed the Ombudsman in carrying out his functions. Section 19 outlines that the Ombudsman could seek recovery of 'costs incurred' as a result of any obstruction. The same methodology could be used to recover costs where private sector complaints are upheld.

In order to provide a further safeguard to public resources and to give the Ombudsman maximum flexibility in future, Section 19 could be amended to provide a permissive power to the Ombudsman to seek to recover costs where private sector complaints are upheld. Although as noted above, private sector investigations are anticipated to be infrequent and relatively low cost, this discretionary power would provide the Ombudsman with a reserve power to seek reimbursement should an investigation involving a private sector provider be particularly complex or lengthy and therefore a significant cost to the public purse.

I trust the above information helps inform the Committee's deliberations.

Yours sincerely,



Daniel Hurford

Head of Policy (Improvement and Governance)

Julie James AC/AM
Arweinydd y Tŷ a'r Prif Chwip
Leader of the House and Chief Whip

Ein cyf/Our ref: MA-(P) /JJ/4715/17

John Griffiths AM
Chair
Equality, Local Government and Communities
Committee, National Assembly for Wales

24 January 2018

Thank you for your letter of 12 December 2017 regarding the Equality, Local Government and Communities Committee's inquiry into human rights in Wales.

I welcome the Inquiry and the Committee's decision to narrow its scope to focus on the ~~Decision~~ Brexit on human rights in Wales. In what remains an uncertain time for human rights in the UK, it is vital we remain vigilant so that protections and standards which benefit the people living in Wales are not weakened.

The Welsh Government has been clear in its position that the UK's withdrawal from the EU should in no way lead to a dilution in human rights protections. Our consistent position is that the European Union (Withdrawal) Bill should preserve the Charter of Fundamental Rights as part of the body of law derived from the EU which is to form part of domestic law on and after exit day.

Thank you for the opportunity to contribute to the Committee's inquiry. Please see the attached response to the issues raised in your letter.

Yours sincerely,



Julie James AC/AM
Arweinydd y Tŷ a'r Prif Chwip
Leader of the House and Chief Whip

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
0300 0604400

Gohebiaeth.Julie.James@llyw.cymru
Correspondence.Julie.James@gov.Wales

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.

Equality, Local Government and Communities Committee

Inquiry into Human Rights in Wales

Welsh Government Evidence Paper

Introduction

The Welsh Government welcomes this inquiry into human rights in Wales. We remain committed to the promotion and protection of the human rights of all people in Wales. Human rights are embedded in our founding legislation and they rightfully continue to influence our actions and decisions.

We also welcome the decision to narrow the focus of the inquiry to the impact of Brexit, as it allows the Committee to consider a pressing issue for human rights practitioners and the general public in Wales and across the UK.

Due to the overlapping nature of the Committee's requests, issues 1 and 2 are addressed together, and similarly issues 3 and 4.

1. Any analysis that is available on the current levels [of] EU funding that currently fund projects relating to human rights in Wales;

2. Information on the work done to date to consider alternative sources of funding for these projects

1. Wales currently receives, £370m a year from the EU to invest in our 2014 -2020 European Structural and Investment Fund Programmes. This includes the Structural Funds (ERDF and ESF), the Rural Development Programme (EAFRD) and the Maritime and Fisheries fund (EMFF).
2. Equal Opportunities and Gender mainstreaming (EO&GM) is one of three cross-cutting themes integrated into the 2014-2020 Programmes. Equality is a basic principle of human rights. The General Regulations governing the European Programmes stipulate that all operations funded through the Common Strategic Framework, must integrate Article 7 - Promotion of equality between men and women and non-discrimination. The Regulation states that equality between men and women and the integration of gender perspective are to be taken into account and promoted throughout the preparation and implementation of programmes, including in relation to monitoring, reporting and evaluation.
3. The Regulation also calls for appropriate steps to be taken to prevent any discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation during the preparation and implementation of

programmes. In particular, accessibility for disabled people shall be taken into account throughout the preparation and implementation of programmes.

4. The European Social Fund (ESF) has had a significant positive impact in supporting some key groups with protected characteristics in Wales and the 2014-2020 ESF programmes are building on the success of the previous funding round. The programmes in Wales have been developed around three priority areas.
5. Tackling Poverty through Sustainable Employment priority is the main lever ESF can bring to bear on tackling poverty, focusing on support for those who are economically inactive or unemployed, with work limiting health conditions or disabilities to access or return to sustainable employment.
6. The Skills for Growth priority is concerned with increasing the skills level, including work relevant skills of those in the workforce, supporting research and innovation activities with graduates and improving the position of women in the labour market.
7. The Youth Unemployment Attainment priority aims to reduce the number of young people at risk of NEET (Not in Education, Employment or Training), improve attainment levels in STEM (Science, Technology, Engineering and Mathematics) and up skill the Early Years and Childcare workforce in West Wales and the Valleys. The priority takes a focussed approach to supporting young people who are NEET and sit within specific target groups including lone parents, young people with disabilities and work limiting health conditions and those experiencing social or digital exclusion.
8. In addition, the West Wales and the Valleys Operational Programme includes a specific objective to reduce underemployment or absence rates for individuals with barriers to sustainable employment which might include disabilities or work limiting health conditions. These include positive actions with employers to encourage reasonable accommodation in the workplace.
9. Challenging gender inequality, both in the development of skills and in tackling the under-representation of women in key sectors, is a key issue for the European Social Fund (ESF) in Wales. Considering the impact on gender at every stage and at all levels of intervention, even when the issues seem gender neutral, allows for opportunities to be taken up and maximized upon.
10. The promotion of gender equality is also the focus of a dedicated funding stream within the ESF programmes for both West Wales and the Valleys and East Wales. The Agile Nation 2 project is supported through this funding and aims to promote gender equality and support career advancement through

targeted support for female employees and through working with employers on improvements in Equality and Diversity Strategies including flexible working initiatives.

11. All projects seeking ESF support are required to establish operational level targets, at a minimum, within the following categories:
 - Women
 - Age (over 54 with the exception of P3 Youth Attainment)
 - Care / childcare responsibilities
 - Disability
 - Work Limiting Health Condition
 - Migrant EU (Includes Roma), Migrant non EU
12. Projects funded are expected to clearly articulate specific actions to address the needs of the target groups and outcomes are monitored during regular and ongoing reviews and through quarterly claims. If an individual project does not meet its specific targets, then the managing authority WEFO can withhold or withdraw part or all of the funding if necessary.
13. To date, (up to 31 December 2017) the ESF programmes have approved 47 projects in the West Wales and the Valleys area with a total investment of over £841million (£543m European Social Fund). Thirty four projects have been approved in East Wales with a total investment of over £351m (£107m European Social Fund).
14. Alongside the support through the ESF programmes, the ERDF operational programmes support the agenda through capital projects which are DDA compliant or better, transport projects which assist access especially for those reliant on public transport and projects which enable communication functions e.g. Broadband.
15. Following the EU Referendum outcome, the Welsh Government sought a cast iron guarantee from the UK Government that Wales will not lose a penny of the funding currently received from the EU.
16. In December 2017 the Welsh Government published a policy paper 'Regional Investment in Wales after Brexit'¹, which marks the first step in the process of designing a new approach to regional investment policy in Wales.
17. The paper sets out the case for continued funding Post-Brexit, which reflects relative need and is vital to invest in priorities which strengthen people and places across Wales. The EU programmes leave a positive and valuable legacy

¹ [Regional Investment in Wales After Brexit](#) - December 2017

in Wales, the absence of replacement funding in full would have an adverse impact on the interventions currently undertaken to address the continuing economic and social needs, particularly for those in our most deprived areas

18. The strong emphasis which has been placed on the cross cutting themes in the Structural Funds programmes, has helped to maximise opportunities, ensure existing legislation and WG policy is being fully met and support good practice across a diverse range of operations.

3. An update on negotiations with the UK Government, particularly relating to human rights and equality; and

4. Information on any discussions you have had with the EU about the protection of human rights during and after Brexit.

19. The EU Charter of Fundamental Rights is currently an important part of the frameworks of legal protections applicable in the UK. It protects fundamental rights such as the right to equality, the protection of personal data, and the prohibition of slavery and forced labour. The UK Government has said the EU Charter of Fundamental Rights will not be incorporated into UK domestic law as part of the European Union (Withdrawal) Bill and this is provided for in clause 5(4) of the Bill.²

20. In *Securing Wales' Future*, published in January 2017, the Welsh Government made clear: "In leaving the EU, we need to be vigilant and insistent that protections and standards which benefit our citizens and the well-being of society as a whole are not eroded".³

21. The Welsh Government has been clear that the UK's withdrawal from the EU should in no way lead to a dilution in human rights protections. Our consistent position is that the European Union (Withdrawal) Bill should preserve the EU Charter of Fundamental Rights as part of the body of law derived from the EU which is to form part of domestic law on and after exit day.

22. On 26 October 2017, when appearing before the Commons' Exiting the EU Select Committee, Steve Baker MP, Parliamentary Under-Secretary of State at Department for Exiting the European Union, committed to publishing a '*detailed memorandum of precisely how every article of the Charter of Fundamental Rights is reflected in existing UK law, or UK law after the Withdrawal Bill has gone through*'.

² [European Union \(Withdrawal\) Bill](#) - Page 3

³ [Securing Wales' Future](#) - January 2017 - Page 8

23. This paper, “Charter of Fundamental Rights of the EU Right by Right Analysis”, was published by the UK Government on 5 December 2017. The paper sets out the UK Government’s analysis of the effect of the treatment of fundamental rights in the EU (Withdrawal) Bill.

24. The UK Government’s position can be summarised as follows:

- The UK Government has chosen not to incorporate the Charter into domestic law on the basis that the Charter does not create any new rights, freedoms or principles but instead catalogues the rights and principles already protected by EU law.
- The UK Government notes that the Charter is only currently applicable to Member States when they are ‘acting within the scope of EU law’.
- The UK Government argues that the removal of the Charter will not affect the rights that individuals already benefit from as the Charter is not the source of these rights.

25. The document states that the UK Government is “*willing to look again at some of the technical detail about how the Bill deals with the general principles of EU law*”⁴ – which we understand would include the protection of fundamental rights. We will carefully scrutinise any related proposals coming from the UK Government.

26. The Right by Right Analysis document suggests that the Human Rights Act 1998 and European Convention on Human Rights will be integral in ensuring the continued protection of the Charter rights following the withdrawal from the EU. However since 2015, members of the UK Government have discussed the intention to the repeal of the Human Rights Act 1998, and derogate from the European Convention on Human Rights.⁵

27. On 18 May 2016, the Queen announced at the state opening of Parliament that the UK Government would bring forward proposals for a Bill of Rights to replace the Human Rights Act. This followed a similar announcement from the Queen during the 2015 state opening of Parliament.

28. Since 2015 the UK Government has not been able to provide any concrete information on what changes a Bill of Rights would introduce. This lack of communication is creating uncertainty in what is already an unprecedented period for the UK. There are concerns that the proposed reform could lead to a

⁴ [Charter of Fundamental Rights of the EU Right by Right Analysis](#) – December 2017- Page 5

⁵ [Theresa May: Human rights laws could change for terror fight: BBC News](#) - 7 June 2017

weakening or regression on some rights, as reflected in the written evidence submitted as part of this ELGC Committee inquiry.⁶

29. The UK Government's plans to reform human rights are currently on hold. The Conservative 2017 General Election manifesto, *Forward Together*, stated: '*We will not repeal or replace the Human Rights Act while the process of Brexit is underway but we will consider our human rights legal framework when the process of leaving the EU concludes. We will remain signatories to the European Convention on Human Rights for the duration of the next parliament*'.⁷
30. This statement does not offer any guarantees over the long term future of the either the Human Rights Act 1998 or the UK's involvement in the European Convention on Human Rights. If the Charter is not incorporated into domestic law, the UK Government could potentially repeal the Human Rights Act 1998, or alter the UK's involvement in the European Convention on Human Rights following the withdrawal from the EU, resulting in the loss of some of the rights currently protected by the Charter, to the extent that those rights are also protected by the Human Rights Act 1998 and the European Convention on Human Rights.
31. The First Minister and Cabinet Secretary for Finance have met with representatives from the EU Commission and Parliament. During their visits they have discussed the Welsh Government's White Paper which sets out our position on a number of issues including the importance of maintaining human rights protections.
32. The Welsh Government is a member of the Joint Ministerial Committee (EU Negotiations) (JMC(EN)) which discusses each government's (UK, Wales, Scotland and Northern Ireland) requirements of the future relationship with the EU. Meetings have been taking place since November 2016; the sixth and most recent on 12 December 2017. The Cabinet Secretary for Finance published a Written Statement about this meeting on the Welsh Government website.⁸
33. Following the JMC (EN) meeting of 12 December 2017, the Cabinet Secretary for Finance wrote to the UK Government to urge it to consider how the principles of Dublin III Regulation⁹ can be incorporated into UK law following the withdrawal from the EU. The Dublin III Regulation provides a legal route for asylum seeking children who have fled to European Member States to be reunited with their families in the UK. This is a crucially important mechanism to safeguard children from smugglers and traffickers by providing safe passage.

⁶ [Inquiry into Human Rights in Wales: National Assembly for Wales](#) - 2017

⁷ [Forward, Together: The Conservative Manifesto](#) - 2017- Page 37

⁸ [Written Statement JMC \(EN\) - Welsh Government](#) - 13 December 2017

⁹ [EUR Lex Dublin III Regulation](#)

John Griffiths AM
Chair, Equality, Local Government and Communities Committee
National Assembly for Wales
Tŷ Hywel
Cardiff Bay
CF99 1NA

25 January 2018

Dear John

P-05-777 Application of the Automatic Fire Suppression Systems Legislation within the current Building Regulations for Wales.

The Petitions Committee has been considering the following petition from Nick Harding, which was submitted with 62 signatures:

Petition text:

We call on the National Assembly for Wales to urge the Welsh Government to review and amend the current implementation of the Fire Sprinkler Regulations, within the current Building Regulations, that came into force in January 1st 2016 (Wales).

The review to amend should specifically take into consideration how the regulation has been integrated into the current Building Regulations with regards to projects that fall within the "Material Change of Use" category (Regulation 5) and the requirement to retrofit Automatic Fire Suppression Systems. The review should primarily take into consideration what is actually achieved when 2 properties are amalgamated into 1 given that:-

1) Where 2 dwellings become 1 the actual building process should be deemed no different from what would be considered as an Extension to a dwelling. Under the current Building regulations Extensions do not require an automated fire suppression system to be installed regardless of size.



2) *The requirement is to install an automatic fire suppression system into the building as a whole and not just the developed part.*

3) *The Regulation does not take into account any substantial fire reduction measures already taking place as a result of the building project, such as reducing the number of kitchens within a property (70 – 80% of all domestic fires start within kitchens – Firesafe.org.uk).*

4) *The current costs for “Retrofitted” automatic fire suppression systems make the requirement not cost effective, a fact backed up by every commissioned and independent study undertaken thus far. (Collected costs and quotations range from £5000 to over £10000 depending on flow availability, number of heads actuating and tank plus infrastructure requirements).*

5) *The Legislation has been implemented without sufficient infrastructure being in place. Within the whole of Wales there are only are only 7 registered BAFSA companies. This is highly likely to lead to non-competitive pricing.*

Additional information:

The review should also look at the wider implications of how this Legislation has been implemented now that it has been in place for some time. Considerations should include:

1) *Maintenance of the Systems – The Legislation does not include anything for any ongoing maintenance requirements once the system has been installed. The Welsh Assembly’s approach to this is to provide the public with a “Leaflet” which is supposed to provide information to the home owner regarding the maintenance requirements of the system; however this falls short of what would be achieved if it was part of the legislation to ensure ongoing maintenance of the system. However the knock on effect of this is to further burden homeowners with higher home owning and running costs, with ongoing maintenance costs estimated at over £2000 per year.*

2) *Legionella Risk (due to lack of maintenance) – It is widely thought that in general sprinkler systems are not a source of Legionella (FPA RC63), however as Wales is the 1st country in the world to legislate Domestic Sprinkler Systems as a*



requirement for all new build and converted homes we believe that more investigation is required especially as the regulation negated to include the maintenance of the system. We believe that as systems age and are not maintained due to costs, Legionella risk will become more prevalent putting the public at a higher risk of infection.

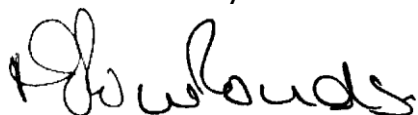
3) Costs – Due to the tight margins for House Builders and Developers, some have now stopped or will be stopping House building in certain areas of Wales (Persimmon & Redrow) as a direct result of this Legislation.

4) Cost Benefit Analysis – During the initial investigation it was estimated that the system would cost £1500 – £2500 per household. In reality the cost are between £5000 and £10000 per installation. Additional equipment is often required because Dwr Cymru cannot guarantee minimum water flow and pressure.

The Petitions Committee considered the petition most recently on the 9 January 2018 when Members agreed write to the Equality, Local Government and Communities Committee to ask whether you intend to undertake any post-legislative scrutiny of the *Building Regulations &c. (Amendment No. 3) and Domestic Fire Safety (Wales) Regulations 2013* during this Assembly.

I would be grateful if you could send your response by e-mail to the clerking team at SeneddPetitions@assembly.wales.

Yours sincerely



David J Rowlands AC/AM
Cadeirydd/ Chair



Agenda Item 9

By virtue of paragraph(s) vi of Standing Order 17.42

Document is Restricted