

# Agenda – Equality, Local Government and Communities Committee

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Meeting Venue:

Committee Room 1 – Senedd

Meeting date: 21 March 2019

Meeting time: 09.30

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## Pre-meeting (09:15 – 09:30)

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

**2 Follow-up session with the Minister for Housing and Local Government in relation to rough sleeping in Wales**

(9.30 – 11.00)

(Pages 1 – 72)

Julie James AM, Minister for Housing and Local Government

Emma Williams, Deputy Director, Housing Policy Division

Sarah Rhodes, Head of Homelessness Branch, Housing Policy Division

## Break (11:00–11:10)

**3 Inquiry into the Blue Badge Scheme in Wales: Eligibility and Implementation: evidence session 1**

(11:10 – 12:10)

(Pages 73 – 90)

Miranda Evans, Policy and Programmes Manager, Disability Wales

**4 Papers to note**



- 4.1 Letter from the Wales Audit Office in relation to the consultation on a three-year forward programme of work**  
(Pages 91 – 98)
- 4.2 Letter from the Minister for Housing and Local Government in relation to the Renting Homes (Fees etc.) (Wales) Bill**  
(Pages 99 – 100)
- 5 Motion under Standing Order 17.42 to resolve to exclude the public from the remainder of the meeting**
- 6 Inquiry into rough sleeping in Wales: consideration of the evidence received**  
(12:10–12:20)
- 7 Inquiry into the Blue Badge Scheme in Wales: Eligibility and Implementation: consideration of the evidence received**  
(12:20–12:30)

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This evidence paper provides the Committee with an update on implementation of the Rough Sleeping Action Plan, actions taken in relation to the recommendations from the Committee's report and an update on Housing First in Wales.

## **Context**

The 2018 annual rough sleeper count was published in February 2019 and can be found at the following link:

<https://gov.wales/statistics-and-research/national-rough-sleeping-count/?lang=en>

Whilst it shows the one night snapshot count was much lower than in 2017, the figures are variable across authorities and the 2 week estimate is actually slightly higher than last year.

The Welsh Government has provided an additional £30m over 2018-19 and 2019-20 to help tackle and prevent homelessness, including rough sleeping. This has enabled a number of innovative approaches to be supported across Wales, learning from which will help drive policy and ultimately impact on homelessness generally, and rough sleeping levels specifically. It is too early to expect that the investment or individual projects would be reflected in significant changes to the rough sleeper data.

## **Rough Sleeping Action Plan**

The Welsh Government published its two-year Rough Sleeping Action Plan in February 2018. The plan set out the Welsh Government's commitment to reducing and ultimately ending the need to sleep rough in Wales. It sets out a range of specific measures to be taken to this end. The plan is underpinned by a clear commitment to a preventative, person centred approach in both policy and legislative approaches to tackling homelessness.

To support early referral of new rough sleepers to services, and to help raise public awareness of how best to help a rough sleeper, we provided funding for a Streetlink promotional campaign, which commenced in April 2018. The campaign included radio, social media and billboard posters. Planning is ongoing for a further campaign beginning shortly. Work is progressing with Homeless Link and the Ministry for Housing, Communities and Local Government (MHLCG), to make improvements to the back office functionality of the system underpinning Streetlink in order to make it easier for Local Authorities to provide feedback on referrals. The UK Government has commenced a review of the Streetlink service with which we are engaged to ensure more user focus.

The Shelter Cymru report 'Trapped on the Street', jointly commissioned by Cardiff, Swansea and Wrexham Local Authorities and funded through homelessness prevention funding was published in July 2018. It identified a number of recurrent themes in the experiences of rough sleepers including that systems were considered difficult to navigate, high prevalence of support needs and trauma, particular difficulties for those resettling from institutions, a feeling that professional attitudes often lacked trust and could be cynical. We have since provided additional funding to the City and County of Swansea to work with Shelter Cymru on follow-up

research, which will focus on the journeys of local rough sleepers. This work is expected to conclude in March 2019.

'Trapped on the Street', in line with other research, underlined the importance of taking a trauma-informed approach and of promoting a culture which seeks to implement the preventative spirit and not just the letter of the legislation. We have invested in training to ensure that housing professionals have the knowledge and tools to operate in a trauma informed approach. Prevention - ACEs - Trauma-informed - Homelessness (PATH) training, funded by Welsh Government and devised and delivered by Cymorth Cymru has already been delivered to over 1,000 housing professionals from across third sector homelessness and housing-related support providers, housing associations and Local Authority housing, homelessness and Supporting People teams. Their positive feedback is supported by the evaluation leading us to invest further this year. The second tranche of PATH training is currently being delivered and will reach another 900 individuals.

We have also commissioned additional training, delivered by Shelter Cymru and the Homelessness Network, for front line staff to support them in the performance of their duties under the legislation. Importantly this training focusses on developing approaches that embody both the spirit and the letter of the legislation.

Development of the Housing Support Grant provides an opportunity for greater alignment of Supporting People and Homelessness Prevention Grant and guidance to ensure the most effective use of resources and join-up of services.

Cardiff Council has been funded to develop a peer mentor service to support rough sleepers. Learning from the approach taken in Cardiff will be shared through the Homelessness Network to inform wider roll out of peer mentor support across Wales.

Welsh Government has funded the development of a guidance paper on assertive outreach being taken forward by Cymorth Cymru. We expect to receive their draft in March. This paper will set out what makes assertive outreach effective and what the key components are for providing an assertive outreach service. The approach focusses on multi-disciplinary support that is persistent and purposeful with the primary aim of ending homelessness, it is also currently being trialled by Wrexham Local Authority with Welsh Government funding support.

Additional funding from Welsh Government has been used in Cardiff and Newport to improve access to safe emergency accommodation and improve move-on. In Cardiff, some of the funding has been used to create a safer environment in the Huggard and increase the support team in their night shelter. In Newport, funding has been used to proactively support people who are sleeping rough into sustainable accommodation.

Where homeless individuals are in agreement, local connection can be an effective tool in helping people to resolve housing issues. Work is currently in hand to develop guidance to support good practice in use of local connection which we expect to publish after Easter. This will support work being undertaken by the Homelessness Network to design a transfer protocol with Local Authorities.

Welsh Government worked with the Homelessness Network in early 2018 to ensure all Local Authorities had extreme weather plans in place and that the plans covered all aspects of extreme weather. Rough Sleepers Cymru have subsequently reviewed the plans and a report outlining best practice and recommending action in some areas has been drafted. They are currently securing the agreement of all partners involved prior to publication.

The first statutory Local Authority homelessness strategies were published in December 2018. Officials are currently reviewing the strategies and will provide feedback via networks and to individual authorities to help spread best practice.

We remain committed to updating the code of guidance to ensure it is clear regarding effective implementation of the legislation, including around local connection and priority need. It will also address necessary changes to allocations and eligibility and be an opportunity to reflect the very best practice including that demonstrated by the Step-by-Step approach. This work cannot be completed until uncertainty around immigration policy and eligibility regulations arising from the outcome of negotiations for exiting the EU is resolved. In the meantime, development of a separate and specific guide on local connection is in hand and the training commissioned through Shelter Cymru is providing practical support to improve front line practice.

We have commissioned an independent assessment of the implications of making changes to priority need. It is vital we fully understand the consequences, both intended and unintended, before determining whether changes are required. An open tendering process has been undertaken and officials are in the process of assessing applications. It is anticipated a review team will be in place by April 2019, with a final report due by April 2020.

Welsh Government is supporting the Street Homelessness Information Network (SHIN) project. As the project involves a number of partners and very sensitive personal information, we are currently working with SHIN to ensure all the right legal and data protocols and agreements are in place. Alongside this we are also supporting a complementary project to examine the feasibility and use of individualised data on statutory homelessness, led by Cardiff University.

In addition to work with SHIN and Cardiff University, work is also in hand to review and improve the annual data gathering exercise. As a result an additional clarification of 'direct access provision' was provided to inform the 2018 count, which may have led to some Local Authorities interpreting the emergency bed definition slightly differently. For the November 2018 exercise, Local Authorities were also asked to record details of any other form of emergency provision specifically for (people at risk of) sleeping rough which had not been recorded under emergency bed spaces as they were not direct access provision.

Welsh Government have continued to work closely with the End Youth Homelessness Campaign and other partners. We recognise tackling the specific needs of young people who find themselves homeless requires a unified approach from youth services, social services, education, mental health, substance misuse,

youth justice and other services and have announced a suite of cross-Governmental measures reflect this. The package includes £4.8million for an Innovation Fund to develop suitable housing and support options for young people.

To drive a collaborative approach at a strategic level, a Ministerial Homelessness Task and Finish Group was established in 2018. The group includes senior cross-sector and cross-portfolio representation, including health, social services and criminal justice agencies, to ensure partnership working in taking forward the homelessness prevention agenda. The Group is tasked with providing cross-sector advice, challenge and expert knowledge specifically relating to Housing First and Youth Homelessness, which will help inform the development and implementation of these policy areas.

On a practical level homelessness policy is increasingly being developed on a cross-Governmental basis. As well as the approach taken to Youth Homelessness where significant investment will be via education and youth services, we are also working closely with health and social care to integrate policy and practice.

An excellent example of innovative, collaborative and person centred practice is the Wrexham Community Care Hub. This innovative model which has been supported by Welsh Government funding, takes a truly person-centred approach to overcome some of the barriers to providing complementary service provision. All key partners are co-located for one day a week, which is reserved to support the homeless and rough sleepers only. This is a model of service provision we are promoting to Local Authorities and Local Health Boards when designing services for this particularly vulnerable group.

For example the high incidence of substance misuse amongst rough sleepers is well evidenced. Building on the progress made through the 2016-18 Substance Misuse Delivery plan we are now working on a cross Government basis to update the Support and Treatment Framework for People with Substance Misuse and Accommodation Problems.

Welsh Government are also currently developing a new 'Together for Mental Health' delivery plan and are working across portfolios to ensure it adequately addresses the needs of those who are homeless or rough sleeping.

Welsh Government continues to seek out ways to identify, share and promote best practice for example through our work with Rough Sleepers Cymru and other partners and through our support for the Cymorth Cymru homelessness symposium in November 2018, which focused on rough sleeping and provided a forum for sharing best practice.

### **Life on the Streets**

Many of the recommendations set out in 'Life on the Streets' are co-terminus with the actions being taken forward under the Rough Sleeper Action plan. This section of the paper seeks to set out actions for those recommendations where progress is not already described above.

In regard to the ELGC Committee's recommendation 4, taking on board the Glyndwr Report findings we have increased the funding available to the Prison Link Cymru projects in both North and South Wales. This work predominantly focuses on retaining accommodation while someone is in custody. In addition, support for those leaving custody is a key component of the Wales-wide refresher training provided to front line homelessness officers. We are also engaged in regular discussions with the Ministry of Justice and Her Majesty's Prison and Probation Service (HMPPS). Welsh Government has agreed to jointly fund a series of Accommodation Pathway Co-ordinator posts to raise awareness of, and further embed the National Pathway. The Ministry of Justice and HMPPS will also be key members of the new Task and Finish Group, which we are establishing to look at further ways to ease the transition from custody back into the community

Consideration will be given to the need and feasibility of alternative funding arrangements as set out in recommendation 6 in the context of wider considerations about the future of priority need given the relationship between priority need and local connection. The development of the Housing Support Grant also provides a unique opportunity to design the new funding stream to better support a clear strategic focus on preventing and tackling homelessness. The single grant mechanism protects the significant level of funding we have committed and enables flexible and innovative responses to be developed to address the multifaceted issues that cause homelessness.

As set out in response to recommendation 11 of the ELGC Committee Report, the Welsh Government has reviewed data on the number of allocations to homeless households by social landlords. We have also commissioned research into possession and eviction action which is expected to report in May 2019. The report will inform our ongoing work with Housing Leadership Cymru to establish and rollout best practise in providing support services. These services can then be targeted at the most vulnerable households, enabling them to remain in their accommodation.

Further to recommendation 12 of the ELGC report it is clear that increasingly Local Authorities discharge their duties under part 2 of the Housing (Wales) Act 2014 through finding accommodation in the private rented sector (PRS). Over 3,200 cases were discharged into the PRS via assistance provided under the Act in 2017-18. Welsh Government recognises the importance of increasing access to this sector.

We have engaged with landlords and stakeholders to identify the issues which may prevent vulnerable people in particular doing so. These include landlord concerns that the introduction of Universal Credit may increase the likelihood of rent arrears as well as restrictive mortgage and insurance conditions which can make it difficult to rent to tenants on housing related benefits at all. It is also suggested that support for tenants provided by local authorities and others can be inconsistent. Officials are engaged with UK Finance to explore the issues around mortgage conditions and work is also underway to develop a potential new approach to accessing PRS properties for vulnerable households.

We have supported 'Open Doors' an award-winning project managed in partnership by Tai Pawb and the Residential Landlords Association which empowers landlords and tenants to reduce issues of inequality and discrimination in the sector. Materials



produced by the project, such as guidance or support to aid independent living, are hosted on the Rent Smart Wales website and the work has informed mandatory equality and diversity training for licenced landlords and agents.

We have also introduced the Renting Homes (Fee Etc.) (Wales) Bill into the Assembly. The Bill recognises that a PRS that does not function effectively risks increasing levels of homelessness by financially excluding those who cannot afford to access the private rental market, due to high costs. It seeks to address this by prohibiting a range of fees which are currently charged to tenants.

Following the decision to create a Housing Support Grant and the UK Government's decision not to devolve funding for short-term supported accommodation we have the funding stability that the Committee sought through recommendation 27. Welsh Government is working collaboratively with stakeholders to develop the new grant which offers a unique opportunity to streamline our processes and ensure that funding supports strategic planning at the local level.

Adequate resourcing as per recommendation 29 is vital and the Welsh government is delivering the additional funding needed to have real impact. The budget for the Housing Support Grant 2019-20 is £126.763m, which is made up of Supporting People, Homelessness Prevention and Rent Smart Wales enforcement. This is in addition to funding of £5.9 million used to support centrally funded homelessness prevention projects and the £10m allocated to youth homelessness.

## **Housing First**

Feedback from the Housing First projects commenced during late 2017-18 shows that many were operating to *some* of the Housing First principles, but not all. Although short-term in nature, the projects demonstrated some success in getting people into accommodation and support the view that there is scope for both Housing First and housing-led or rapid-rehousing projects.

The feedback also suggests that Local Authorities under-estimated the challenge of putting a Housing First project in place, which meets the full set of principles. The one project which was demonstrably meeting all of the principles of Housing First was the Salvation Army run project operating out of Cardiff, which has now been incorporated into the Cardiff Trailblazer project.

Building on the early pilots, we have now established a Housing First Trailblazer fund. The rationale is that a new pilot phase for Housing First, over a period of at least 18 months will enable us to establish a firm evidence base from projects that meet the full set of Housing First principles. The Trailblazer approach will also provide opportunities to test new ways of partnership working with other services such as mental health and substance misuse to inform potential future wider roll-out.

As of the end of February, four Trailblazer projects have been approved which will see Housing First operating in five Local Authority areas (Cardiff, Conwy and Denbighshire, Merthyr Tydfil and Rhondda Cynon Taf).

These trailblazer projects are in addition to projects being developed (or already being delivered) in-house by Swansea, Gwynedd, Bridgend and Ceredigion Local Authorities. In addition, the Wallich has operated a well-regarded project in Anglesey since 2014, the Wallich are working closely with the Housing First Network and Local Authority to ensure this project meets all of the principles of Housing First.

With Welsh Government support, Cymorth Cymru has established a **Housing First Network**, chaired by Crisis. The Chair of the Network sits on the Ministerial Homelessness Task and Finish Group, to ensure their work feeds into and is overseen by the Task and Finish Group.

To promote fidelity to the model, the Network has developed a ten point **registration self-assessment checklist** which forms part of the Housing First Trailblazer application process. The registration form includes the key principles and also contains a scoring template to assess a project's fidelity to the Housing First model.

A specification is currently being drafted for **evaluation** of Housing First in Wales. The evaluation will cover projects funded by Welsh Government, including the initial housing-led projects, and those being developed independently. It will focus on ascertaining the improvements made in client's accommodation, health and wellbeing as well the impact in relation to demands on other services. The current timetable estimates that the project will commence in 2019 with a view to reporting early findings in 2020.

As part of evaluation a desktop review of existing international evidence including the comparison of "congregate" and "dispersed" models, however we feel that the dispersed model would better meet the needs of rough sleepers in Wales.

19<sup>th</sup> February 2019

### **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 on the progress made towards implementing the Welsh Government's Rough Sleeping Action Plan. We welcome the aims of the plan and particularly the intention to end the need for people to sleep rough. We do have concerns that it is difficult to assess the progress made on the strategy as it is somewhat vague in parts and lacks tangible outcomes and actions. We feel that there is little evidence to suggest any of the actions have yet had a significant impact on the number of people of sleeping rough. In our experience the solutions being offered to people are broadly the same as those a year ago, with the exception of a small number of Housing First projects having been launched in the last year.

To successfully tackle rough sleeping there needs to be a shift away from traditional models and a leap towards rapid rehousing, flexible support and Housing First, with the principles of Housing First being embedded at every level of and type of accommodation. There is robust international evidence which shows that this is what

works. The emphasis needs to be on getting people into permanent homes with support as soon as possible, rather than pushing everybody through the hostel system.

In order to achieve this we strongly recommend a feasibility study of an All Wales Housing First programme to calculate the costs and benefits of implementing Housing First at scale. We also recognise the structural issues impacting on rough sleeping and urge the Welsh Government strategy to focus on increasing access to affordable, permanent homes and to support local authorities to focus on the structural barriers to housing as well the individual.

We welcome the focus on assertive outreach but stress that this is only appropriate if services are able to offer suitable and appropriate accommodation. To implement assertive outreach with only an offer of floor space, pod or emergency bed is unethical and unfair. We would call for an end to the use of floor space as we repeatedly hear that this is not what people want or need. Floor space should not in our view be described as 'accommodation'.

Our research found that people who are sleeping rough struggled to access housing advice and assistance. We heard of the difficulties they faced trying to make a homelessness application, gather and present evidence and follow their case through the system. As such we have established a new street advocacy service which aims to ensure people are able to navigate the system and get the help that they are legally entitled to.

We urge the Welsh Government to ensure that local authorities are listening to the views and experiences of people sleeping rough and the organisations that work with them and value and act upon these. We cannot end rough sleeping if we are not offering the right help, and we cannot know what is the right help if we do not listen to the people who need it.

Going forward we welcome the review of priority need, the consideration of devolving administrative powers over welfare reform and the affordable housing review, and hope that these pieces of work will lead to reductions in the numbers of people forced to sleep rough in Wales.

Evidence to Equality, Communities and Local Government Committee –  
ministerial scrutiny session on the rough sleeping action plan  
March 2019

### 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.

### Summary

The ongoing need for anyone to sleep rough on the streets of Wales – and the UK as a whole - indicates an unacceptable societal failure. Recent homelessness projection figures for Crisis suggest that the scale of rough sleeping and some other forms of homelessness has worsened over the past decade. However, Crisis has set out how homelessness can be ended for good in the three nations of Great Britain by governments taking the right policy choices – in our report *Everybody In: how to end homelessness in Great Britain*.<sup>1</sup> There are specific challenges in Wales in relation to rough sleeping, but there are also significant opportunities for the new Welsh Government leadership to take a lead in ending it, drawing on the best evidence about what works.

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- Scale of rough sleeping and sleeping in cars, tents and on public transport (pages 2-3)
- Commitment to targets to end rough sleeping as a first step to ending all common forms of homelessness through prevention and rapid rehousing (pages 3-4)
- Measures to increase access to housing and support (page 4)
- The review of priority need (page 6)
- Enhanced measures to prevent homelessness from state institutions (page 6)
- Scaling-up the Housing First approach for people with complex needs (page 7)
- How the Minister intends to lead a more constructive public discussion on rough sleeping and homelessness (pages 7-8)
- Definition of 'core homelessness' and corresponding numbers for rough sleeping and sleeping in cars, tents and public transport (pages 10-11)

<sup>1</sup> Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis. <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/international-plans-to-end-homelessness/everybody-in-how-to-end-homelessness-in-great-britain-2018/>

### Crisis' suggestions for areas of enquiry

1. The Minister's views on improving the current ways we measure rough sleeping.
2. If the Minister will make steps to commit to a target date for ending rough sleeping as the first step towards ending homelessness more generally through prevention and rapid rehousing.
3. If the Minister will ensure that she will consider the housing needs of people affected by homelessness as part of her response to the affordable housing supply review.
4. In advance of the priority need review reporting, what steps the Minister is considering to relax priority need tests for groups identified in the committee's recommendations last year as a step towards abolishing it entirely.
5. If the Minister has discussed a 'duty to prevent' with ministerial colleagues as a way to help prevent homelessness from state institutions, such as prisons, hospitals, and the care system, and the impact that homelessness has on those policy areas.
6. How the Minister plans to change commissioning arrangements to help scale-up Housing First, including longer commissioning terms to aid planning and working beyond housing, especially with health.
7. If the Minister has reflections on the current state of discussion about rough sleeping and homelessness in Wales and how Welsh Government will encourage a more humane debate on homelessness, focused on solutions and the dignity of those affected.

#### 1. Scale of rough sleeping and sleeping in cars, tents and on public transport

Research commissioned by Crisis, and undertaken by Heriot-Watt University, shows that between 2012 and 2017 the number of people sleeping rough in Wales increased by 75% and the number sleeping in cars, tents and on public transport increased by 50%.

This research includes updated figures for 2017 from a wider dataset of 'core homelessness' figures, which also includes other common forms of homelessness, such as being in unsuitable temporary accommodation, sofa surfing, and people in shelters and refuges. Core homelessness refers to households who are considered homeless at any point in time due to the most acute forms of homelessness (or living in short-term or unsuitable accommodation).<sup>2</sup>

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<sup>2</sup> Bramley, G. (2017) Homelessness projections: Core homelessness in Great Britain, London: Crisis. <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/types-of-homelessness/homelessness-projections-core-homelessness-in-great-britain-2017/>

See full definition of core homelessness and the data table for rough sleeping and sleeping in cars, tents and public transport at the end of this paper.

Crisis' research is based on the trends observed through the rough sleeping count but looks to provide a more comprehensive picture by using multiple data sources. The analysis uses a technique which calculates the number of people experiencing different types of homelessness on any one night during the year, so it differs from the rough sleeper counts that are conducted over single points in time in the winter.

The research uses wider data sources and so it identifies those people who are missing from the count numbers. For each household or individual captured in the dataset by year we know the duration of their homelessness and the average time they have experienced each type of homelessness (including rough sleeping and sleeping in cars, tents and public transport). For example, someone may have experienced both rough sleeping and living in a hostel in any given year. In capturing this information the analysis is able to remove double counting from the figures and therefore the research presents a point in time figure for any given night in each year.

The estimate for the number of people living in cars, tents and public transport are based on levels of rough sleeping in Great Britain and has been calculated in relation to a study by Anna Clarke et al (2015) estimating the scale of youth homelessness.<sup>3</sup> This research estimated that the number who reported staying in cars, tents or public transport was approximately double the number reporting core rough sleeping (i.e., streets, parks, car parks), but the average duration was around half that estimated for core rough sleeping from other sources and therefore the stock or point-in-time figure is similar to rough sleeping levels.

## **2. Commitment to targets to end rough sleeping as a first step to ending all common forms of homelessness through prevention and rapid rehousing**

Crisis believes the Welsh Government's action plan is missing an overarching target date by which Welsh Government would like to see an end to rough sleeping as a step towards ending other common forms of homelessness through effective prevention and rapid rehousing.

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<sup>3</sup> Clarke, A., Burgess, G., Morris, S. and Udagawa, C. (2015) Estimating the scale of youth homelessness in the UK: Final report. Cambridge Centre for Housing and Planning Research, [https://www.cchpr.landecon.cam.ac.uk/Projects/Start-Year/2014/Estimating-the-scale-of-youth-homelessness-in-the-UK/Report/copy\\_of\\_Full-Report](https://www.cchpr.landecon.cam.ac.uk/Projects/Start-Year/2014/Estimating-the-scale-of-youth-homelessness-in-the-UK/Report/copy_of_Full-Report)

There is a strong link between rough sleeping and other forms of homelessness: people often experience other forms of homelessness before becoming street homeless; and around half of people who are homeless have three or more experiences of being homeless.<sup>4</sup> These other forms include being trapped in temporary accommodation without a plan to move on, sofa-surfing, or leaving state institutions to no fixed address.

Crisis recommends Welsh Government makes a commitment to end all forms of homelessness as a matter of urgency and to put in place an action plan to deliver on this commitment. Crisis' plan to end homelessness showed how governments can make homelessness rare, brief and non-recurring and included an inclusive definition of 'homelessness' that is wider than just the visible forms, such as rough sleeping. Homelessness is made rare through effective homelessness prevention. We cannot prevent all cases of homelessness but when people lose their homes they need a rapid rehousing approach (homelessness is brief) to get into safe and secure accommodation in houses/flats in ordinary communities with the right kind of support that enables people to sustain their accommodation (homelessness is non-recurring).

The Welsh Government action plan identifies as a "long-term objective" ending the need for people to sleep rough. This plan overlaps with the end of the ten-year homelessness plan (2009-2019) that brought about many advances, including the prevention approach that has inspired similar work in England.

This is an urgent challenge. Committee members will be aware of the recent, visible increases in rough sleeping and other street-based activity. We know from evidence that people rough sleeping can be at risk of earlier death than the wider population<sup>5</sup>, can suffer greater harm to their health, and are much more likely to be victims of anti-social behaviour than the general public.<sup>6</sup>

There is very strong international evidence that one of the features of a successful rough sleeping support system is swift action to prevent or quickly end street homelessness through rapid rehousing. This reduces the number of people sleeping rough who develop complex needs or become entrenched in the situation.<sup>7</sup> Crisis would like to see Welsh Government leading the system change needed to bring about a rapid rehousing approach along with homelessness prevention that reduces the number of people and households needing rehousing in the first place.

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<sup>4</sup> Mackie, P. & Thomas, I. (2014) Nations apart? Experiences of single homeless people across Great Britain. London: Crisis.

<sup>5</sup> Office of National Statistics (2018) Deaths of homeless people in England and Wales: 2013 to 2017. Office of National Statistics: London

<sup>6</sup> Thomas, B (2012), Homelessness Kills. Crisis: London.

<sup>7</sup> Mackie, P., Johnsen, S., and Wood, J. (2017) Ending rough sleeping: what works? An international evidence review. Crisis: London



### 3. Measures to increase access to housing and support

Responding to the latest rough sleeping count figures, the Minister for Housing and Local Government, Julie James AM, said there was a need for “strategies to get people into decent, secure accommodation as fast as possible and not the temporary fixes that we know don’t work”.<sup>8</sup> Crisis agrees with this rapid rehousing aim and would like to see plans brought forward as soon as possible to realise the aim.

The affordable housing supply review will be a key moment for Welsh housing and homelessness policy as the supply of good quality homes in a range of areas, with a choice of tenure types, is one of the foundations of reducing and ending homelessness through prevention and rapid rehousing. Housing supply is an issue that is going beyond party political boundaries with policy papers and strategies from Welsh Conservatives<sup>9</sup> and Plaid Cymru consulting<sup>10</sup> as well as the current Welsh Government review. We are pleased to see this, given the long-term nature of the solutions needed to address the housing backlog in Wales.

There is widespread evidence that Wales (and other parts of the UK) need many more homes at social rent levels. Crisis’ evidence is that building 4,000 social rent homes a year for 15 years will meet the backlog of housing need for people at risk of or experiencing homelessness and for people on lower incomes (Wales also needs housing for other types of tenure, such as private rented sector).<sup>11</sup>

### 4. The review of priority need

The current priority need tests are barriers for people who are deemed ineligible for rehousing. Crisis recommends Welsh Government brings about the vision of every person being provided with the housing support they need – whether to prevent their homelessness or to rapidly rehouse them if they do become homeless. Priority need is a barrier to achieving this, so Crisis recommends it is phased out for all people in line with the committee’s recommendations in the report, *Life on the Streets: preventing and tackling rough sleeping in Wales* (2018). Scotland abolished priority need in stages and, while only part of the solution, it would make a significant difference in preventing and ending homelessness.

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<sup>8</sup> Full citations on Crisis website, <https://www.crisis.org.uk/ending-homelessness/rough-sleeping/rough-sleepers-and-complex-needs/>

<sup>9</sup> Welsh Conservatives (2018), *Housing a Nation* [https://www.welshconservatives.com/sites/www.welshconservatives.com/files/2018-12/Housing\\_a\\_Nation.pdf](https://www.welshconservatives.com/sites/www.welshconservatives.com/files/2018-12/Housing_a_Nation.pdf)

<sup>10</sup> Plaid Cymru (2019), *Housing Supply for the Future*, [https://www.partyof.wales/housing\\_cartrefi](https://www.partyof.wales/housing_cartrefi)

<sup>11</sup> Bramley, G. (2018) *Housing supply requirements across Great Britain for low income households and homeless people*. London: National Housing Federation and Crisis, <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/housing-models-and-access/housing-supply-requirements-across-great-britain-2018/>

## 5. Enhanced measures to prevent homelessness from state institutions

There is still a lot of evidence that people are becoming homeless on leaving state institutions in Wales, despite the existence of agreed pathways for groups such as people leaving prison.

The Independent Monitoring Board of HMP Cardiff found the “lack of accommodation on release was a major concern within the resettlement process” and that this was both “inhumane” and a “major factor in reoffending”.<sup>12</sup> Welsh Government’s own evaluation of homelessness services to adults in the secure estate found variation in practice and evidence of different public services not cooperating effectively to prevent homelessness.<sup>13</sup> WLGA’s analysis of the 2018 rough sleeping count mentions the need to improve provision.<sup>14</sup>

Crisis recommends Welsh Government establish a ‘duty to prevent’ all individuals at risk of homelessness to housing services and for the duty to rest with public bodies beyond housing. A ‘duty to refer’ people at risk to housing services exists in England as part of the Homelessness Reduction Act, which the Housing (Wales) Act inspired.<sup>15</sup>

Welsh Government should also explore the potential of using Critical Time Intervention, which is a model designed to prevent homelessness for people with mental illness, following discharge from hospitals, shelters, prisons and other institutions. The Social Care Institute for Excellence says:

*“This transitional period is one in which people often have difficulty re-establishing themselves in stable housing with access to needed support. Critical Time Intervention works in two main ways: by providing emotional and practical support during the critical time of transition and by strengthening the individual’s long-term ties to services, family, and friends. Ideally, workers who have established relationships with clients during their institutional stay to deliver post-discharge assistance.”<sup>16</sup>*

<sup>12</sup> Independent Monitoring Board (2019), Annual Report – HMP Cardiff, <https://s3-eu-west-2.amazonaws.com/imb-prod-storage-1ocod6bqky0vo/uploads/2019/02/Cardiff-2017-18-pub.-Feb-2019.pdf>

<sup>13</sup> Madoc-Jones, I., Hughes, C., Dubberley, S., Gorden, C., Washington Dyer, K., Wilson, F., Ahmed, A., Lockwood, K., Wilding, M. (2018), Evaluation of homelessness services to adults in the secure estate. Welsh Government. <https://gov.wales/docs/caecd/research/2018/180627-evaluation-homelessness-services-adults-secure-estate-en.pdf>

<sup>14</sup> WLGA (2019), Analysis of 2 week National Rough Sleeper Count Questionnaires November 2018, <https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=2182>

<sup>15</sup> For more on the development of the duty in England see Jacob, R. (2018) Preventing homelessness: It’s everybody’s business. London: Crisis. <https://www.crisis.org.uk/about-us/the-crisis-blog/preventing-homelessness-it-s-everybody-s-business/>

<sup>16</sup> Social Care Institute for Excellence (2018) A rapid evidence assessment of what works in homelessness services, London: Crisis, <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/services-and-interventions/a-rapid-evidence-assessment-of-what-works-in-homelessness-services-2018/>

## 6. Scaling-up the Housing First approach for people with complex needs

A review for Crisis found that the evidence for Housing First is both “exceptionally strong” and “far stronger than is true of any other housing-related intervention targeting rough sleepers”.<sup>17</sup> Housing First works for people with high and complex needs to help them access long-term, high quality support for as long as they need while living in ordinary, permanent housing. The consensus is that it works for people where no other housing approach has worked or is likely to work. Housing First is just one form of the ‘rapid rehousing’ approach, along with other measures, such as Critical Time Interventions, which are considered above.

Estimates for Crisis say that scaling up Housing First would involve placements for somewhere between 600 and 1,100 people (lower and higher estimates respectively).<sup>18</sup> Crisis is a member of the Wales Housing First Network and has been involved in implementing the Welsh Government action plan’s measure to ensure Housing First’s principles are adhered to in the implementation of the approach. The priority for Welsh Government, local authorities, and other partners should be to scale up the approach as quickly as is practical while retaining the agreed national principles for Housing First.

To achieve this, we need to re-think commissioning practices. Housing First requires a different way of delivering services to people with complex needs who are homeless. It is effective but takes time and is a longer-term commitment that requires much more secure and long-term funding arrangements. The outcomes rely on the security of housing and a broad range of support services that are flexible and responsive to the person.

## 7. How Welsh Government will encourage a more humane debate on homelessness, focused on solutions and the dignity of those affected

Under the ‘support’ actions the Welsh Government plan says it would be: *“Promoting a positive message to the public about the best way to help a rough sleeper, and raise awareness of the difference between street based activity and those who are actually homeless. (From October 2018)”*<sup>19</sup>

As our own evidence shows, this is important not just for human dignity but for the public and policymakers to understand the causes and solutions to homelessness. At the moment, the public generally does not think about homelessness in terms of broader policies and trends and thinks of homelessness as shaped by the homeless person’s circumstances, character and choices rather

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<sup>17</sup> Mackie, P., Johnsen, S., and Wood, J. (2017) Ending rough sleeping: what works? An international evidence review. Crisis: London, p.xi

<sup>18</sup> Blood, I., Goldup, M., Peter, L. and Dulson, S. (2018) Implementing Housing First across England, Scotland and Wales. Imogen Blood & Associates. London: Crisis and Homeless Link

<sup>19</sup> Welsh Government (2018), Rough sleeping action plan

than factors like the shortage of affordable homes or delays in receiving support.<sup>20</sup> We also know from polling evidence for Crisis that while 81% of the Welsh public was worried about homelessness and over half (57%) feel angry, upset or frustrated about homelessness across Britain.<sup>21</sup>

Crisis is very concerned about the state of discussion in the public domain about rough sleeping and wider homelessness. We worked late last year with Shelter Cymru to jointly publicise our concerns.<sup>22</sup> Particularly, we are concerned that the discussion can miss the causes and solutions of homelessness; and the value and human dignity of people forced to sleep rough have not been respected, including by some people in positions of authority. There are some good examples of media coverage<sup>23</sup> but also some bad examples, including:

- Many references in media headlines and coverage to 'the homeless' as a type/class of person.
- Dehumanised discussion about 'homeless tents' (rather than people).
- Senior local elected politicians talking about sleeping rough as a 'lifestyle choice'<sup>24</sup> or saying individual rough sleepers are responsible for their situation by saying there is 'no need' to sleep rough.
- Campaigns, backed by local authorities, that use potentially misleading imagery and messages about individuals on the streets and aim to discourage the public from giving to or engaging with people on the streets. These include the 'diverted giving' schemes in Cardiff, Swansea, Newport and Neath Port Talbot.

Crisis would like to see Welsh Government challenging individuals and organisations who talk about people affected by homelessness in this way and to work with the housing and homelessness sectors, media and public on reframing the debate about ending homelessness to ensure respect for all people affected and constructive, solution-focused discussion that includes those who have experience of homelessness as key partners.

<sup>20</sup> O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom. FrameWorks Institute.

<sup>21</sup> Crisis (2018), Over three-fifths of people across Wales feel powerless to help homeless people, new survey shows, <https://www.crisis.org.uk/about-us/media-centre/public-feels-powerless-to-help-homeless-people/>

<sup>22</sup> Crisis and Shelter Cymru (2018), Call for councils to change their approach to begging, <https://www.crisis.org.uk/about-us/media-centre/crisis-and-shelter-cymru-call-for-councils-to-change-begging-approach/>

<sup>23</sup> WalesOnline (5 February 2019), The complex set of reasons why homelessness in Wales is more visible than ever, <https://www.walesonline.co.uk/news/politics/complex-set-reasons-homelessness-wales-15769048>

<sup>24</sup> BBC Wales News online (5 May 2018), Cardiff rough sleepers are making 'lifestyle choices', <https://www.bbc.co.uk/news/uk-wales-south-east-wales-44012807>



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### Core homelessness definition

- Rough Sleeping
- Sleeping in tents, cars, public transport
- Squatting (unlicensed, insecure)
- Unsuitable non-residential accommodation e.g. 'beds in sheds'
- Hostel residents
- Users of night/winter shelters
- Domestic abuse survivor in a refuge
- Unsuitable temporary accommodation (which includes bed and breakfast accommodation, hotels etc.
- 'Sofa Surfing' – staying with others (not close family), on short term/insecure basis/wanting to move, in crowded conditions (this does not include students)

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

Number of people estimated to be sleeping rough or in cars, tents and public transport across GB and its nations, 2010-17

		2010	2011	2012	2013	2014	2015	2016	2017	% change: 2012-17	% change: 2016-17
GB	Rough Sleepers	5,100	6,150	6,200	7,250	7,250	9,150	10,250	12,300	98%	20%
	Car, tent, p t	4,850	5,850	5,900	6,900	6,950	8,850	9,950	11,950	103%	20%
England	Rough Sleepers	4,000	5,000	5,000	6,000	6,000	8,000	9,000	11,000	120%	22%
	Car, tent, p t	4,000	5,000	5,000	6,000	6,000	8,000	9,000	11,000	120%	22%
Wales	<b>Rough Sleepers</b>	<b>250</b>	<b>250</b>	<b>200</b>	<b>250</b>	<b>250</b>	<b>300</b>	<b>300</b>	<b>350</b>	<b>75%</b>	<b>17%</b>
	<b>Car, tent, p t</b>	<b>250</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>250</b>	<b>250</b>	<b>300</b>	<b>300</b>	<b>50%</b>	<b>0%</b>
Scotland	Rough Sleepers	850	900	1,000	1,000	1,000	850	950	950	-5%	0%
	Car, tent, p t	600	650	700	700	700	600	650	650	-7%	0%

Source: Bramley, G. (2017) Homelessness projections: Core homelessness in Great Britain, London: Crisis<sup>25</sup>

<sup>25</sup> Plus updated figures in Crisis (2018) 'More than 24,000 people facing Christmas sleeping rough or in cars, trains, buses and tents, Crisis warns', <https://www.crisis.org.uk/about-us/media-centre/more-than-24-000-people-facing-christmas-sleeping-rough-or-in-cars-trains-buses-and-tents-crisis-warns/>

<b>About Cymorth Cymru:</b>	
<p>Cymorth Cymru is the umbrella body for providers of homelessness and housing related support services in Wales. Cymorth Cymru acts as the ‘voice of the sector’, influencing the development and implementation of policy 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.</p> <p>Cymorth has approximately 100 members across Wales, made up of third sector organisations, housing associations and local authorities. Our members work with a wide range of people, including people who are homeless, or at risk of homelessness; families fleeing domestic abuse; people dealing with mental or physical health problems; people with learning disabilities; people with alcohol or drug problems; refugees and people seeking asylum; care leavers and other vulnerable young people; and older people in need of support.</p>	



**Cymorth Cymru welcomes the opportunity to respond to this consultation. Our role as the umbrella body for homelessness and housing support providers gives us a valuable perspective on the challenges experienced by a diverse range of people and support providers across Wales.**

There are specific points that we want to make in this response to the Committee, some which respond to the Rough Sleeping Action Plan, and others which are observations on developments across the housing sector since the Committee's report.

## **1. The scale of rough sleeping**

- 1.1. It is difficult to accurately identify the number of people sleeping rough in Wales. While many people are visible on the streets of our towns and cities, others are hidden from view or located across vast rural areas which are more difficult to monitor. However, the Welsh Government, local authorities and a number of other organisations co-ordinate or record data which helps us to assess the scale and emerging trends.
- 1.2. The latest annual National Rough Sleeping Count<sup>1</sup> took place in October 2018. During the 2 week count a total of 347 people were estimated to be sleeping rough across Wales, which is an increase of less than 1% compared with the previous year. 158 individuals were observed sleeping rough across Wales during the single night count, which was a decrease of 16% on the previous year. However, it is important to note that heavy rain and flooding affected some areas on the night of the count, which may have had an impact on data collection.
- 1.3. While the official count did not evidence a large increase in rough sleeping, it is clear that the numbers are still far too high. It should also be noted that the number of people sleeping rough during the single night count in 2018 remains higher than the figure recorded in 2016. In addition, many of our members who work directly with people who are homeless and sleeping rough believe that there continues to be an increase in rough sleeping. The statistics collected by The Wallich Rough Sleeper Intervention teams show an upwards trend across several areas in Wales. The number of rough sleepers engaging with the Huggard's Day Centre has also increased since 2017.
- 1.4. There should be no rough sleeping in Wales. It results in people being at risk of violence and abuse, poorer health outcomes and a much lower life expectancy. It is critical that we do all we can to end rough sleeping in Wales.

## **2. National Rough Sleeper Count Questionnaires 2018**

- 2.1. A useful report<sup>2</sup> has been produced by the local authority Housing Networks Project following the completion of over 300 questionnaires by people who were rough sleeping across Wales. We recommend that Committee members read the report, as it reveals more information about the demographics of the people surveyed, as well as the reasons they gave for becoming homeless. The vast majority, 86% of respondents, stated that they would like help to stop sleeping rough.
- 2.2. It is concerning that a high proportion of people had been sleeping rough for a number of weeks (26%), months (30%) and years (10%). Rough sleeping should not be taking place at all in 21<sup>st</sup> century Wales, and people should certainly not be sleeping rough for weeks, months or years at a time. People who have been sleeping rough for this amount of time

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<sup>1</sup> <https://gov.wales/docs/statistics/2019/190205-national-rough-sleeper-count-november-2018-en.pdf>

<sup>2</sup> <https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=2182>

have clearly been let down by the system. It is important that appropriate evidence-based services such as assertive outreach and Housing First schemes are developed to support people to move off the streets and into secure, sustainable accommodation with the support they need to manage their tenancy.

- 2.3. Mental health problems have featured in many of our conversations with people who use and provide services and this issue is prominent within the Housing Networks Project report. 182 respondents (54%) disclosed that they have a mental health issue and there has been an increase in the number of people who cite mental health as the reason for them sleeping rough:
  - 20 people said 'mental health; was the reason for them 'sleeping rough this time', compared to 1 person the previous year.
  - 19 people said 'mental health issues' was the initial reason for becoming homeless, compared to 3 the previous year.
  - 29 people said 'substance misuse' was the reason for them 'sleeping rough this time' compared to 4 people the previous year.
- 2.4. It is concerning to see increases in the numbers of people who started sleeping rough or lost their accommodation because of their mental health or substance misuse problems. It could be that these issues were under-reported in previous surveys, and this year's data is simply a more accurate account of the reasons people became homeless. However, it could also indicate that people have found it more difficult to access the support they need for their mental health and/or substance misuse issues, and this has led them to reaching crisis point and sleeping rough. It also poses the question of whether vulnerabilities such as mental health problems have been appropriately considered when local authorities have been assessing whether people qualify as priority need for housing.
- 2.5. It is also concerning that 123 individuals (37%) questioned reported that they had been discharged from hospital to no fixed abode compared to 66 individuals (20%) in 2017.
- 2.6. An area of concern is the impact of the change to priority need for prison leavers, which came into force with the Housing (Wales) Act. The Housing Networks Project report states that 43% of people who responded to the survey had previously been in custody. Although the number of people citing 'release from prison' as the reason for sleeping rough has decreased from 45 in 2017 to 37 in 2018, the number of people who have ended up on the streets following their time in prison is concerning.
- 2.7. We support calls for the Welsh Government to re-instate automatic priority need for people leaving prison, when the legislative opportunity becomes available. In the meantime, Welsh Ministers, the Ministry of Justice and other partners should continue to address the findings and recommendations of the *Evaluation of homelessness services to adults in the secure estate*<sup>3</sup>.

### **3. Structural causes of homelessness and rough sleeping**

- 3.1. Welfare reform and the lack of truly affordable housing are two major structural causes of homelessness.
- 3.2. The Welsh Government has provided a much more favourable environment for housing associations in Wales compared to the situation in England. However, the pace of development has not kept up with the needs of the population, and the Welsh Government must support and fund the development of much more social housing over the coming years.

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<sup>3</sup> <https://gov.wales/docs/caecd/research/2018/180627-evaluation-homelessness-services-adults-secure-estate-en.pdf>

- 3.3. Research conducted on behalf of Crisis estimated that Wales needs to build 4,000 houses at social rent each year for the next 15 years to meet the needs of people experiencing or at risk of homelessness. Community Housing Cymru has outlined the ambition of housing associations in Wales to deliver 75,000 homes by 2036. However, if these are to be truly affordable then housing associations need assurances about the continued availability of Social Housing Grant, at appropriate levels, to enable them to translate this ambition into reality.
- 3.4. The Affordable Housing Review offers an opportunity to address this issue but Ministers must ensure that government funding is targeted at the provision of social housing for people on the lowest incomes.
- 3.5. Welfare reform continues to be a huge problem for many of the people our members support. Too many people face delays in receiving their payments or their assessment fails to appropriately recognise the impact of their disability or health problem. The pressure builds on people and their families and increases the risk of homelessness.
- 3.6. While we would like the UK Government to re-think their welfare policies and end delays to people's payments, we welcome the First Minister's recent statement that the Welsh Government should 'explore the devolution of administration'. We are acutely aware of the risks associated with this, not least the possibility that Wales could be short-changed by the UK Government in the transfer of responsibilities and funding. However, Scotland has demonstrated that it is possible to take a more compassionate approach to the administration of welfare. This has the potential to make the difference between someone ending up sleeping rough or not – and should therefore be seriously considered by government and opposition parties.

#### **4. Funding for homelessness and housing-related support services**

- 4.1. When we gave evidence to the Committee during its original inquiry into rough sleeping, we were facing an unprecedented threat to the future funding of homelessness and housing-related support services in Wales. We were very grateful for the Committee's scrutiny of this issue and members' work to highlight their concerns with the Welsh Government's proposals for a super grant that would merge seven non-housing grants with three housing grants.
- 4.2. We were delighted that the Welsh Government decided to change course and opted instead to create a new Housing Support Grant, which brings together Supporting People Programme funding and Homelessness Prevention funding. We now have a commitment that this funding will be ring-fenced for the remainder of this Assembly term. However, this equates to just two years, which hardly gives the sector the stability it needs to plan services and retain experienced and skilled staff. Politicians from all parties recognised the importance of these services over recent years and championed the need to retain a ring-fence around this funding. We urge all political parties to make a commitment to retaining this ring-fence beyond the next election, regardless of who forms the next Welsh Government.
- 4.3. A consistent message from people who commission and deliver homelessness and housing-related support services is the need to move beyond one-year funding allocations. The Wales Audit Office report on the Supporting People Programme<sup>4</sup> (published August 2017) recommended that the Welsh Government re-introduce indicative three-year Supporting People funding allocations at the earliest opportunity to assist local authorities in their planning. This has been echoed in recent engagement events about the development of the new Housing Support Grant.

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<sup>4</sup> <http://www.audit.wales/system/files/publications/Supporting-People-2017-English.pdf>

4.4. We have welcomed additional funding for homelessness and rough sleeping, but urge the Welsh Government to make longer term commitments to additional funding. While in-year funding can be helpful for pilot projects, it is difficult for local authorities, landlords and support providers to plan strategically due to its short term nature. While we appreciate the constraints on the Welsh Government due to uncertainty surrounding the Welsh block grant, a sustained effort will be required to reduce homelessness and end rough sleeping - and this surely requires a longer term commitment to funding.

## **5. Experts by experience**

5.1. Listening to the views and experiences of people who use services is crucial in any response to homelessness and rough sleeping. In January 2019 we held three events in Carmarthen, Rhyl and Cardiff and invited people who have used homelessness and housing-related support services to share their views and experiences. We also created an online survey to enable people to participate if they couldn't attend the events.

5.2. Approximately 100 people attended the events and over 80 people responded to the survey. We are currently analysing the responses, and will be happy to share the final report with the committee once it has been published. However, some of the themes emerging from the engagement exercise are:

- The importance of building trust and treating people with respect and compassion, and being non-judgemental when delivering services to people who are homeless.
- The importance of holistic, person-centred support, which addresses all of the factors that contribute to homelessness and housing instability, such as mental health, finances, relationships, education, training and work,
- The need for more support for substance misuse problems, including specialist accommodation schemes for people at different stages in the recovery.
- The need to improve access to mental health services and therapeutic support.
- The negative impact of arbitrary time limits on support, and the need for support to be flexible as people's needs and engagement changes.
- The need to increase awareness of homelessness and housing-related support services among the public and in other sectors – so that people know where to go if they need help.
- The lack of affordable housing, particularly for young single people, and the difficulties accessing move-on accommodation following time in supported accommodation.
- The need for continuity and retaining staff within support services.

5.3. The views of the people who participated in the events and the survey will be shared with the Welsh Government as they continue to develop the new Housing Support Grant.

## **6. Development of psychologically-informed approaches**

6.1. Last year (2017/18), Cymorth Cymru, alongside the Housing Networks, the WLGA, and the ACE Support Hub, developed and delivered Welsh Government-funded PATH training to over 1100 practitioners across the housing sector in Wales. PATH training is a housing-focused programme of training that increases understanding of adverse childhood experiences and trauma on people's lives and encourages the use of psychologically informed environments.

- 6.2. Research shows that most people who experience homelessness have experienced trauma in their early life<sup>5</sup>, which means that it is essential our services and systems are set up to respond effectively to that reality. Psychologically-informed approaches are essential to the prevention of homelessness and to effectively engaging with people who are experiencing long-term entrenched rough sleeping. For those individuals, whose common responses are that the system is failing them<sup>6</sup>, a new way of working is needed, and trauma-informed practice is part of that new way of working.
- 6.3. The programme is aimed at third sector homelessness and housing-related support providers, housing associations and local authority housing, homelessness and Supporting People teams. One of the training courses is aimed at frontline staff and team leaders, with another course targeted at leaders and commissioners across the sector, recognising that we need strategic buy-in to embed this approach.
- 6.4. The independent evaluation of the programme<sup>7</sup> was extremely positive and we have received feedback about how services have started to incorporate psychologically informed approaches within their services. One cited an example of how they are working differently in relation to warning and eviction processes.
- 6.5. Another service has described the impact of embedding a psychologically informed approach following a number of staff attending the PATH Training. Within the first 3 months they reported a 30% reduction in the number of incidents, a 33% reduction in incidents of violence and self-harm, a 37.5% reduction in intervention involving ambulance / hospital services and a 84% reduction in police intervention. While these are early indicators, and the pattern may well fluctuate over time, this is very positive.
- 6.6. A second tranche of PATH training is nearing conclusion, expecting to be finished at the end of March 2019, with another 650 practitioners expected to have been trained. We hope to continue our work to support organisations to embed this approach throughout their services, with the aim of reducing homelessness supporting more people with experience of trauma to live independent and fulfilled lives.

## 7. Development of Housing First across Wales

- 7.1. The importance of adopting a Housing First approach has been given much more attention across Wales. It is an internationally evaluated model, and the research demonstrates beyond doubt that it works, with examples from Finland, for example, achieving a reduction in long-term homelessness of 1,200. The model, as delivered in Finland, was described in an international evaluation<sup>8</sup> as follows:

*“In the view of the evaluation team, the Finnish programme to reduce long-term homelessness is one of the best examples in the world with regard to the functionality of the Housing First model in work to reduce long-term homelessness.”*

- 7.2. Since the initial inquiry, the Welsh Government work on Housing First has continued at pace, and Cymorth Cymru has been significantly involved in this work. We organise and provide the secretariat for Wales’ Housing First Network, which is a cross-sector group of providers, housing associations, local authorities and other interested parties such as HMPPS, health representatives, and social services commissioners.

<sup>5</sup> <https://www.feantsa.org/download/winter-2017-trauma-and-homelessness2297258390271124817.pdf>

<sup>6</sup> <https://sheltercymru.org.uk/what-we-do/policy-and-research/trapped-on-the-streets-understanding-rough-sleeping-in-wales/>

<sup>7</sup> Available upon request.

<sup>8</sup> [https://helda.helsinki.fi/bitstream/handle/10138/153258/YMra\\_3en\\_2015.pdf?sequence=5](https://helda.helsinki.fi/bitstream/handle/10138/153258/YMra_3en_2015.pdf?sequence=5)

- 7.3. The initial steps taken by this network were to create a series of principles for widespread adoption across Wales. This was the first step taken by the network, because Housing First effectiveness is linked significantly, across the international evaluations, to the extent to which the projects show “fidelity” to the model. There was a real risk that Housing First projects could end up being delivered which are not as effective as they would be if they followed the set principles.
- 7.4. These principles<sup>9</sup> were co-produced by the network, which amended and added to the principles developed by Homeless Link, ensuring that the latest research and understanding was incorporated into the Welsh principles. These principles are now a key part of the Welsh Government trailblazer funding, and the network is committed to raising awareness of these principles for projects that are delivered outside of that funding mechanism.
- 7.5. In terms of Housing First, it is important for the Committee to be aware that although it is an extremely effective solution, it is not a *quick* solution. The Welsh Government should be fully commended for pushing ahead with this agenda. However, for the model to be delivered effectively, and at scale, without compromising the fidelity and integrity of the model, care must be taken that it is delivered in a gradual, incremental way. This will of course be frustrating for the Committee, who will no doubt want to see a rapid reduction in the numbers of people sleeping rough, but we must be extremely clear that the work to support someone off the streets is extremely complex and cannot be rushed. It is also critical that services such as health, particularly mental health and substance misuse, are fully committed to the delivery of Housing First, as this model will not be successful without their full co-operation.

## **8. Development of assertive outreach services across Wales**

- 8.1. One of the foundations of any effort to address the crisis in rough sleeping, is the need to adopt an assertive outreach approach. Assertive Outreach is a particular form of street outreach that targets the most disengaged rough sleepers with chronic support needs and seeks to end their homelessness through persistent, purposeful, pro-active, multi-disciplinary support. This is an area that services across Wales are already engaging in, as it is not a new way of working, having been first adopted in the late 90s<sup>10</sup>. It is identified as an effective way of addressing long-term entrenched rough sleeping.
- 8.2. Cymorth Cymru has been working with stakeholder across the homelessness sector to develop a series of principles for assertive outreach for Wales, on a similar basis to the Housing First principles referenced above. Because this work is widespread already, the principles will be drawn much more broadly, to ensure as much consistency as possible whilst allowing for differences in service delivery. Early findings from the focus groups and initial suggestions for principles have been shared with the Welsh Government homelessness team, in time for them to come to the Committee, with a final version to be published later in March 2019.

## **9. Public attitudes and political responses to rough sleeping**

- 9.1. One key concern we have about public and political responses towards people sleeping rough, is the public discourse which suggests that rough sleeping is a choice, that police should forcibly move people on, that tents should be torn down, and individuals ‘forced’ to

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<sup>9</sup> Available on request.

<sup>10</sup> [https://www.crisis.org.uk/media/238368/ending\\_rough\\_sleeping\\_what\\_works\\_2017.pdf](https://www.crisis.org.uk/media/238368/ending_rough_sleeping_what_works_2017.pdf)

engage with services. We cannot caution against this approach strongly enough. At *best*, the results from these approaches will be short-lived, as research demonstrates that individuals who choose to engage are more likely to maintain their tenancies. At *worst*, it reinforces and further builds on the narrative that rough sleepers are second class citizens to be addressed with ever more punitive approaches.

- 9.2. We urge the Welsh Government, and policymakers in all parties, to resist this approach and instead adopt a more compassionate, trauma informed approach and advocate for evidence based interventions as described above.

## **10. Development of emergency accommodation across Wales**

- 10.1. Since the Committee's report, Cymorth Cymru acting in its role as secretariat for Rough Sleepers Cymru, has guided and facilitated work on emergency accommodation. The first step was to ensure there is a consistent definition of emergency accommodation. This was produced in consultation with Rough Sleepers Cymru, by the Local Authority Housing Networks Project, and was used in the latest Rough Sleeper Count, to ensure that local authority returns are accurately reporting the availability for emergency accommodation.
- 10.2. Work is ongoing, through Cymorth Cymru, to establish a series of principles for what people sleeping rough can expect from emergency accommodation, which was a piece of work suggested by Rough Sleepers Cymru, to address the perception amongst some people about the safety or suitability of emergency accommodation. The aim is for this work to inform the delivery and commissioning of emergency accommodation.
- 10.3. Furthermore, Rough Sleepers Cymru has completed a review of all 22 local authority inclement weather plans, suggesting clear improvements whilst recognising the good practice evident in all the policies. This has already resulted in some local authorities amending and making improvements to their plans. A key theme that arose in all local authority plans was the need to count extreme heat as inclement weather, as much as extreme cold, as the heatwave in summer 2018 was a difficult time for many rough sleepers, but without the same level of public sympathy as is seen during the colder periods.
- 10.4. Emergency accommodation is an area of the housing sector that needs significant attention. Those providers that delivered these services are excellent and committed practitioners, who work with some of the most vulnerable people in Wales. We strongly believe that they need to be given increased resources to be able to provide the support they need to long-term rough sleepers.
- 10.5. It is also important that emergency and temporary accommodation is exactly that, and does not become a long term solution for people. This type of accommodation is not designed to be permanent and is often communal. It should be regarded as a temporary respite from the streets while more secure and sustainable accommodation is secured. However, too many people are unable to find affordable move-on accommodation with the support they need to support their recovery and live independently. This has to change to prevent emergency accommodation from becoming the norm for people who are homeless.

## **11. Development of monitoring systems for rough sleepers across Wales**

- 11.1. An exciting project supported by the Welsh Government is the Street Homeless Information Network (SHIN), administered by The Wallich. This system, modelled on the successful CHAIN system in place in London, aims to create a robust and live system that can accurately monitor the numbers of people sleeping rough at any one time. This has been a

significant missing piece of the jigsaw in policymaking that aims to address rough sleeping, and the fact that the Welsh Government has given this project its support bodes well for the eventual creation of this database.

- 11.2. Once we have the ability to monitor the numbers of people sleeping rough, policymakers at all levels will be able to make robust policy decisions based on real, verifiable data, rather than the current rough sleeper count, which has long been described as not fit for purpose (albeit, currently, the only mechanism we have to count). We urge the Committee to show support for this project, and the impact it could have on rough sleeping policy interventions.

## **12. The involvement and commitment of health services**

- 12.1. The Welsh Government accepted the ELGC Committee's recommendation that the Health Secretary should take joint responsibility for delivering the Rough Sleeping Action Plan. This is welcome and is absolutely necessary if we are to make progress in a number of areas relating to rough sleeping. Working to help a rough sleeper into accommodation can easily stall if access to health services is delayed by lengthy waiting lists. Meaningful health involvement at a strategic level and a commitment to ensure swift access to health services is crucial if Housing First is to be a success. Collaboration with homelessness and housing related support services is also essential to addressing the health inequalities and shorter life expectancy experienced by rough sleepers. Some excellent examples of collaboration exist in some areas but often seems to be dependent on specific relationships between committed professionals, rather than something that is embedded across the system.
- 12.2. We recommend that the Minister for Health and Social Services, alongside the Minister for Housing and Local Government, takes action to encourage more systematic engagement from health services to end rough sleeping. Examples of where this approach is needed are manifold but are particularly prevalent in the interactions between homelessness services and mental health, substance misuse or emergency services. Having a common framework for all Health Boards to work towards in partnership with local authorities and housing partners is vital. There needs to be a widespread national understanding across Wales, that people sleeping rough need priority access to health services, to enable rough sleeping to be eradicated. Nothing short of clear political leadership will be enough to make this happen in a consistent and cohesive way across Wales.

## **13. Co-production and partnership working**

- 13.1. Finally, we cannot emphasise enough the importance of meaningful collaboration and co-production in the sector's work to tackle homelessness in general and rough sleeping in particular. Funding is scarce and there is huge pressure on local authorities and support providers to deliver more for less. However, it is imperative that all stakeholders show leadership and work to build trusting relationships with those who are committed to ending rough sleeping. It is important that local authorities recognise the skills, expertise and experience that have been built up within the third sector, as well as their ability to innovate and draw in additional funding from charitable sources.



## **1. Introduction:**

- 1.1 Huggard works to increase individual wellbeing and end incidents of homelessness through a commitment to continual improvement and working collaboratively to provide safe spaces that are welcoming, supportive and empowering.
- 1.2 Huggard runs a low threshold Day Centre for people that are experiencing homelessness. People access the Day Centre to take advantage of high-quality cooked meals, washing/showering and laundry facilities and a clothes store as well as to take advantage of specialist services focussing on advocacy, benefit advice and support, personal/social development and substance misuse support.
- 1.3 The centre provides a hub and a place of engagement for people who are experiencing homelessness or need support to maintain or secure accommodation. Most people using Huggard's Day Centre are either sleeping rough or in emergency or temporary accommodation.
- 1.4 In 2018, Huggard was asked to apply, through Cardiff Council, for additional Welsh Government funding to address rough sleeping within the city. Huggard's priorities were to:
  - increase the safety and security of our emergency overnight accommodation and to assist in meeting the actual costs of the delivery of this service
  - respond better to the engagement opportunities with individuals accessing Huggard's substance misuse service, who may not be engaging with any other services, through the provision of additional therapeutic intervention specialists and additional substance misuse staff to support brief intervention work at the point of needle exchange
- 1.5 Additional temporary resources have been provided towards additional security staff at night, breakfasts for clients staying in our emergency accommodation and additional bedding. We have also received additional funding for helping with bonds into the private rented sector and an extra member of our generic day team from February until the end of March. This has provided for a safer environment for clients and staff within Huggard's emergency overnight accommodation and helped to manage the increased and more complex demands upon our day centre.
- 1.6 Additional resources for therapeutic interventions and substance misuse support have been included into the Local Authority's Multi Discipline Team (MDT) and we have started discussions with the local authority about how the MDT can support the work of

Huggard's Day Centre and engage with the high levels of rough sleepers using the service and those in Huggard's emergency overnight accommodation.

## 2. Safe Space Development

2.1 We have been in discussion with a number of partner agencies regarding how the Huggard Day Centre can be part of a collaborative and innovative city-wide Safe Space model, coproducing services and acting as a dynamic multi-agency hub for services aimed at people rough sleeping within the city. We also support the development of a hub for night time services within the city, working in close partnership to increase engagement levels with those not accessing current services. To begin development of the Huggard centre as a hub for services a number of projects are currently being undertaken within the centre, in addition to our specialist advocacy, development and substance misuse work.

2.2 **Skill Share Project:** We have been awarded European funding through WCVA's Active Inclusion Fund to deliver the Skill Share at Huggard Project. This Skill Share will be offering volunteering and training opportunities to Huggard clients who are; out of work, over 25 and based in Cardiff. Participants will have the opportunity to:

- Complete an induction process in Huggard's Day Centre Kitchen and public coffee shop, Cafe H
- Earn work based certificates issued by Huggard
- Earn accredited work based qualification (e.g. Food Hygiene Level 2)
- Take part in a supportive volunteering placement at Cafe H and Huggard Kitchen
- Enjoy progression opportunities like further education, volunteering or paid employment.

2.3 **Probation Service:** We have been in discussions with the Probation Service to hold a fortnightly/monthly women's pathfinders surgery at the Huggard, this will hopefully help our more transient females to engage with their officers. The Probation Service has identified that the Huggard Centre is where their clients are spending most of their time and it will hopefully help increase engagement with probation and help to reduce the number of recalls for breach. Details are still to be finalised but we are hoping that this will be up and running in spring.

2.4 **Velindre Trust:** We have agreed to work with the Velindre trust to implement some working practices with the board around the homeless community who are diagnosed with cancer and are receiving treatment. The plan is to try and have some early intervention with the hospital knowing when a rough sleeper is receiving treatment at an early stage. This will help us to put a plan in place ready for when the patient is discharged. This initiative will start with us being included in a training day to explain to hospital staff regarding what our services are and what exactly we have to offer a patient who is discharged from their care.

- 2.5 **Tenovus:** We have been put in touch with Tenovus Cancer charity to supply Huggard with sun cream, this will start coming in to us over the next couple of months. We have agreed that we will store it and distribute to partner services including the Local Authority's outreach and multi discipline team.
- 2.6 **Cervical Screening:** We are looking at the possibility of having the mobile cervical screening vehicle visiting the centre to try to encourage more of an uptake, similar to the TB screening we did last year which proved very successful.
- 2.7 **BBV Clinic:** We operate a BBV clinic within the centre and we have started undertaking Point of Contact (POC) oral swab tests for Hep C. This is a swab of saliva and results are received in 20 minutes. To help with this, we have provided free meal vouchers to encourage people to get tested, and by the time they have eaten their meal, the result is available. Where a positive result is established treatment can be started within a day or so. Between June and Dec 2018, 85 clients have been tested with 19 reactive results where the individual has gone on to further investigation and treatment. The frequency of testing is now increasing as we have proved to be the most successful BBV clinic in Cardiff.
- 2.8 **Student Optometrists Cardiff:** This project is in partnership with public health Wales as part of a research project to raise awareness for more inclusive health policies to support the homeless. The service visits twice a month and sees on average 12 people per session, providing eye tests so the doctor can write out the prescriptions. The service provides advice on how to maintain good vision and directing clients to eye clinics that are nearby or in the health hospital. The service provides eye drops for clients suffering with dry eyes.
- 2.9 **Street Paws:** We have been working with the National Charity Street Paws to provide free treatment for Cardiff's Homeless pets. The visit the Huggard Centre once a month. So far, they have seen and treated 14 dogs (and one hamster). All dogs have been vaccinated against parvovirus, leptospirosis, distemper and hepatitis. These can all cause serious illness and are potentially fatal if not treated. All dogs have been given flea and worming treatment, which covers a range of parasites including mites and ticks. These things again can cause a dog to become unwell if left untreated. At Street Paws drop ins we regularly see 5/6 dogs for regular flea and worming and health checks. Street Paws have treated; ear infections, skin infections, minor wounds and have one dog on long term anti inflammatory for osteoarthritis. We have also supplied joint supplements to improve movement.
- 2.10 **Forgotten Feet:** The aim of this project is to put in place a free regular chiropody/podiatry service. Forgotten feet mission statement says it is for those most in need. It's for those least likely to have the means to access it. Forgotten Feet have been providing drop ins at Huggard. This is because we are a service accessible by the people they are trying to reach. Problems commonly encountered include: blisters, calluses, long and onychomycotic nail, fungal skin infections, pitting keratolysis due to prolonged wet conditions as well as wounds. Anyone with any sort of infection is referred to a local GP for medication or creams.

- 2.11 **Student Volunteers Cardiff:** The Student's Huggard Centre project is a befriending and support project for adults in Cardiff who are homeless. A group of student volunteers who are generally studying care or social work qualifications visit the centre for three hours a week to socialise with the service users, engaging them in activities such as arts and crafts, bingo, baking and cooking and board games. The provision of these diversionary activities is essential in the day centre as it adds to a positive atmosphere.
- 2.12 **DWP Digital Inclusion:** As a part of DWP's digital strategy for rolling out UC we have developed a partnership where a work coach from the Job Centre visits Huggard once a week. The work coach engages with Huggard clients helping them to set up new claims and manage their current claim. As part of the digital inclusion partnership we provide DWP with important feedback regarding the barriers to UC for our clients. So far we have collaborated to negotiate workarounds for essential criteria enabling clients with NFA or and no bank account to claim.
- 2.13 **Huggard First Responder Team:** In partnership with the Welsh Ambulance Service, at Huggard we have a team of first responders for providing emergency medical intervention. This is for situations beyond first aid and before paramedics can arrive. Staff are trained by Welsh Ambulance service trust. An intense week-long training course teaching correct working practice for emergency life support. Between October 18 and December 18 we responded to:
- 11 Synthetic cannabinoid overdoses
  - 8 Opiate overdoses
  - 2 Chest pains
  - 1 Diabetic coma
  - 1 Cut lip

### 3. Current Situation with Regards to Rough Sleeping:

- 3.1 Over the winter period there has been sufficient availability of emergency accommodation in Cardiff, made up of floorspace and pod spaces. However, this type of accommodation is quite restrictive and often communal in nature and therefore should be regarded as a temporary respite from the streets while suitable accommodation is sourced. Unfortunately, for many individuals they find themselves in and out of emergency accommodation for long periods of time and either lose sight of moving on or find it increasingly difficult to manage the necessarily restrictive nature of such accommodation. This can push people back to the streets. Huggard is currently completing 8 additional emergency pod spaces that we hope to have finally completed shortly. However, even with this additional resource, once additional winter provision finishes at the end of March, we are likely to see more people being forced to sleep rough.
- 3.2 During winter provision of Emergency Overnight Accommodation, 75% of those using Huggard's Emergency Accommodation have been self-referring into the project, by-passing the Council's Gateway system. Huggard employs an Emergency Accommodation

Support Worker, which is temporarily funded through trust funding to engage with those using this service and support them to access the Housing Options Centre, Gateway service and to set up benefit claims and register with a GP. Discussions are taking place as to how the Local Authority's Multi Discipline Team can engage with those using the centre.

3.3 Substance misuse is a major factor compelling a significant proportion of people to spend all of their time on the streets and this can be a barrier to engagement with emergency accommodation services. Without their own accommodation, individuals have no alternative but to use illicit substances on the streets. They may also be compelled to spend a large amount of time begging to generate the income to support an addiction. This leads to an increase in both rough sleeping and an understandable necessity to present a negative or inaccessible picture of support services available. We have found that for some of these individuals the engagement with Huggard's substance misuse service provides an important and often unique opportunity for engagement and brief intervention work.

3.4 Huggard welcomes the addition of a substance misuse worker as part of the Council's Multi Discipline Team. However, Huggard is currently overwhelmed with individuals using its substance misuse service and we lack adequate resources to provide the level of brief intervention support needed to help people develop more appropriate coping strategies in dealing with adverse experiences. Between April 2018 and January 2019, Huggard has supported 83 individuals into substance misuse treatment services but over the same period has seen 198 new individuals registered on our needle exchange database. The use of Spice, particularly the frequency of use, presents a significant barrier to accessing or maintaining emergency accommodation where the use of illicit substances is necessarily prohibited due to the nature of the accommodation.

3.5 Welfare reforms have made claiming and maintaining benefits harder. This has led to people being solely reliant on begging as their only form of income. Frontline homelessness services have a number of staff supporting individuals with benefit claims but this work is taking up an increasing amount of staff time.

## 4. Statistics

4.1 Following are figures providing a comparison of the last 3 months of 2018 compared to the previous year. These figures are collected on Huggard's bespoke database system that records details of each individual client's visit to the centre against housing status.

4.2 These figures from October to December 2018 show an increase in those rough sleeping and an increase in the frequency of use of the Day Centre for each individual. We have found the levels of poly-drug use increasing, due to exploitation of this client group

through the County Lines distribution of illicit substances. This has led to greater complexity of needs and has led to a situation where it is becoming harder to support individuals away from Emergency Overnight Accommodation, or Hostel Accommodation into supported, shared housing where security of tenure makes it difficult to maintain a safe and sustainable environment for tenants within a property.

<b>Day Centre - Quarterly Figures.</b> <b>1<sup>st</sup> October - 31<sup>st</sup> December</b>	<b>2018</b>	<b>2017</b>	<b>% change</b>
Number of visits	<b>6,649</b>	5,027	+32%
Number of Clients	<b>636</b>	584	+9%
Number of unique individual rough sleepers	<b>280</b>	244	+15%

<b>Advocacy - Quarterly Figures.</b> <b>1<sup>st</sup> October - 31<sup>st</sup> December</b>	<b>2018</b>	<b>2017</b>	<b>% change</b>
Number of Sessions with Clients	<b>306</b>	542	-44%
Financial Gains made for clients	<b>£145,310</b>	£390,465	-63%

<b>Substance Misuse - Quarterly Figures.</b> <b>1<sup>st</sup> October - 31<sup>st</sup> December</b>	<b>2018</b>	<b>2017</b>	<b>% change</b>
Number of Sessions with Clients	<b>366</b>	313	+17%
Numbers engaged with Treatment Services	<b>33</b>	28	+18%
Number of Needle Exchange Transactions	<b>2130</b>	1760	+21%
Number of new clients registered	<b>56</b>	42	+33%

<b>Emergency Overnight Shelter</b> <b>1<sup>st</sup> October - 31<sup>st</sup> December</b>	<b>2018</b>	<b>2017</b>	<b>% change</b>
Number of Different Clients Accommodated	<b>276</b>	283	-2%
% moving on to other accommodation	<b>13%</b>	24%	-11%

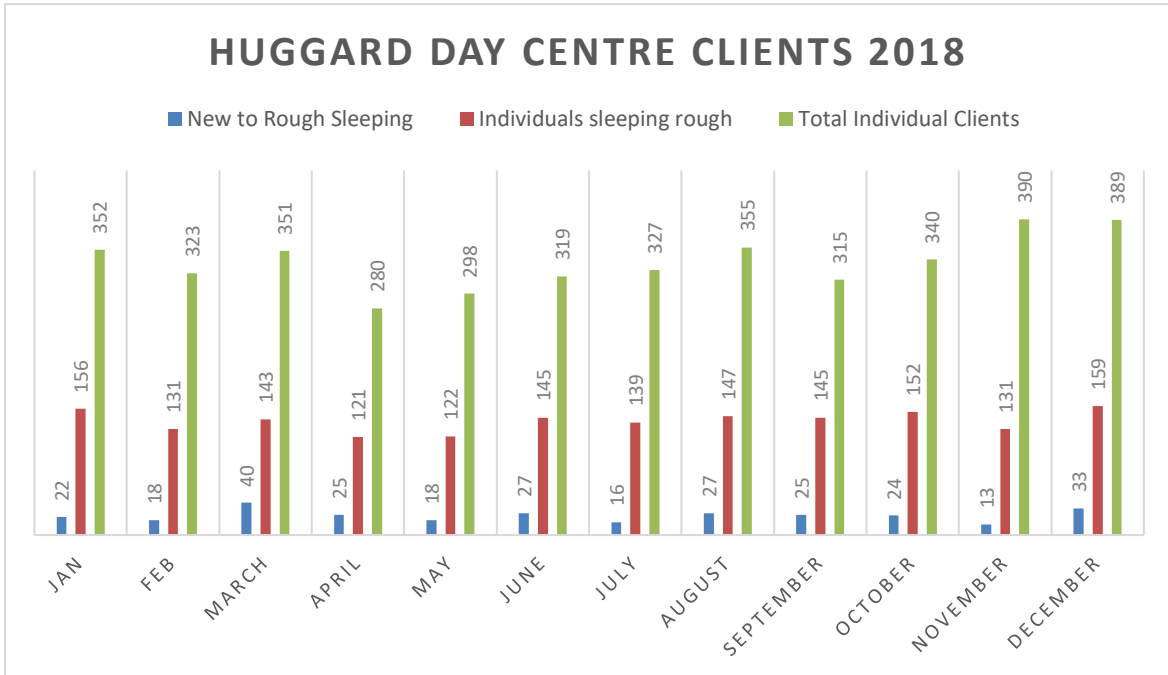
<b>Supported Housing</b> <b>1<sup>st</sup> October - 31<sup>st</sup> December</b>	<b>2018</b>	2017	% change
Number of Different Clients Accommodated	<b>35</b>	36	-3%
Number of Clients that moved out during period	<b>4</b>	7	-43%
% assisted to move on to more suitable accommodation	<b>25%</b>	100%	-75%
Voids as of 31 <sup>st</sup> Dec (caused by lack of appropriate referrals and maintenance voids)	<b>23</b>	22	+5%

<b>Hostel</b> <b>1<sup>st</sup> October - 31<sup>st</sup> December</b>	<b>2018</b>	2017	% change
Number of Different Clients Accommodated	<b>35</b>	30	+17%
Number of Clients that moved out during period	<b>14</b>	12	+17%
% assisted to move on to more suitable accommodation	<b>36%</b>	50%	-14%
Voids as of 31 <sup>st</sup> Dec	<b>0</b>	0	0

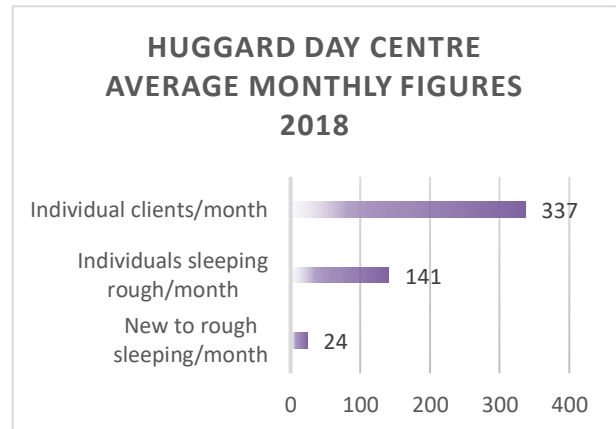
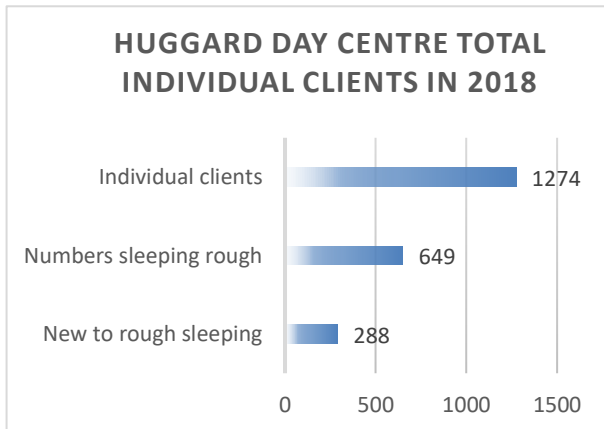
## 5. Day Centre Visitor Statistics for 2018

5.1 Following are details of the demographics of visitors to Huggard's Day Centre in 2018.

5.2 Huggard's Day Centre was open every day in 2018 and worked with a total of 1,274 people of whom 649 had slept rough in Cardiff at some point during the year. In 2018, Huggard supported 288 people who had slept rough for the first time, averaging 24 new rough sleepers each month.



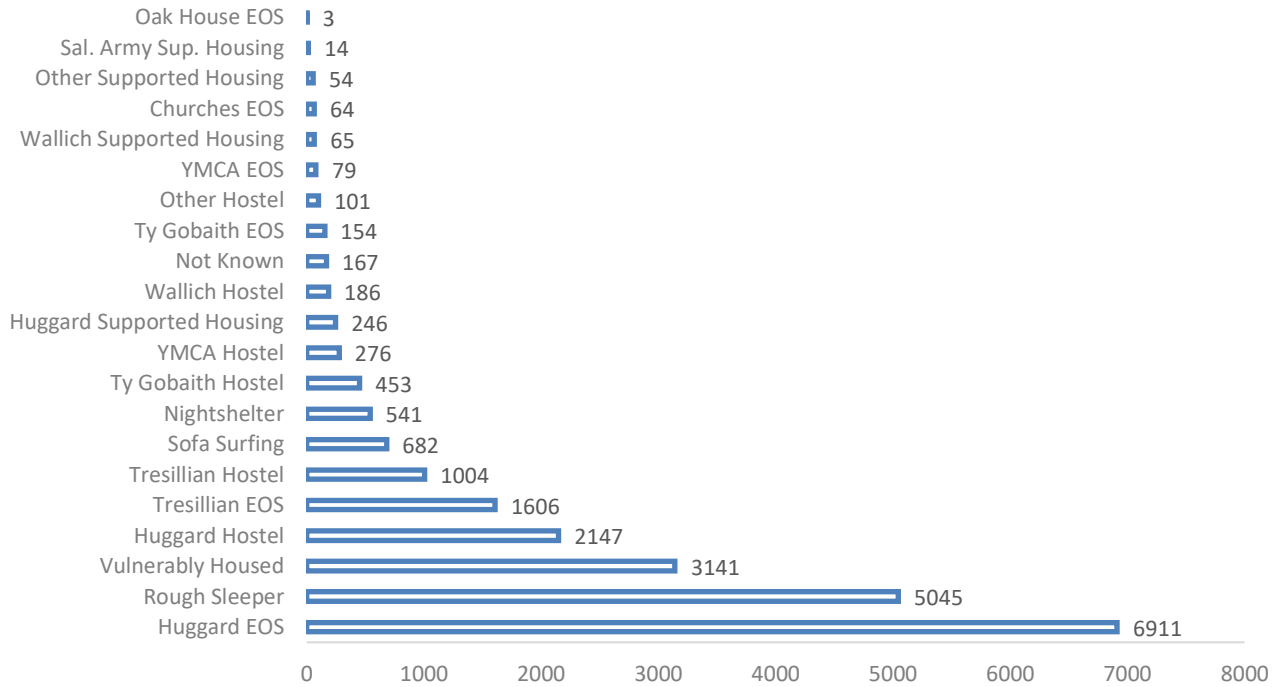
\* Clients have been recorded as new to rough sleeping if it is the first time they have presented as sleeping rough to Huggard services since January 2013. It is possible that they may have previously slept rough outside of Cardiff or slept rough in Cardiff but not previously presented to Huggard services.



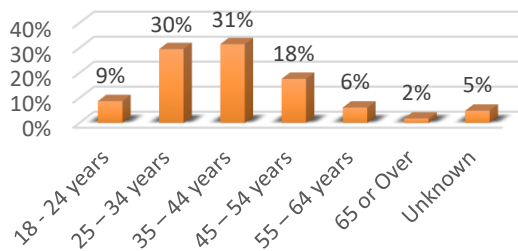
In 2018 Huggard’s Emergency Overnight Accommodation, working closely with the Day Centre, sheltered 724 unique individuals, 213 of whom were supported into more suitable accommodation. In 2018, Huggard ran 1,333 activity sessions involving 431 individuals (34% of all clients).



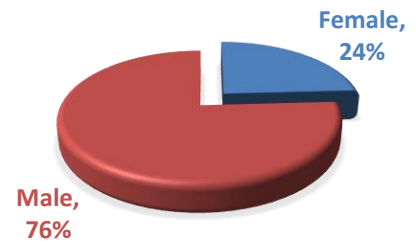
### HOUSING STATUS OF HUGGARD DAY CENTRE VISITORS BASED ON RECORDED NUMBER OF VISITS IN 2018. (22,939 TOTAL RECORDED VISITS IN 2018)



### DAY CENTRE VISITOR AGE PROFILE 2018



### DAY CENTRE VISITOR GENDER PROFILE 2018



Richard Edwards, Huggard Chief Executive, March 2019.

## **Analysis of 2 week National Rough Sleeper Count Questionnaires**

### **Summary**

This report summarises the information provided by 347 people sleeping rough who engaged with services during the two-week count period of the Welsh Government rough sleeper count from 15<sup>th</sup> to 28<sup>th</sup> October 2018.

The report collates the responses from 19 of the 22 Welsh Local Authorities in order to provide a national picture of the rough sleeper population. This should help partners to understand better the issues facing people and plan provision to better support them and help them into sustainable accommodation.

The study found that of those sleeping out most were male with 16% being female. The most common age range was 30-39 year olds. Many people had been sleeping out for several months. The main reasons for sleeping rough this time were stated as substance misuse, loss of previous accommodation (for a variety of reasons), release from custody and relationship breakdown. When asked about their initial reason for homelessness and most people stated that this was because of family breakdown, relationship breakdown or loss of tenancy (for various reasons). A third of those questioned had been in custody at some time in their life. Over half stated that they had a mental health issue and a third disclosed that they had a diagnosed physical health condition. Over a third of those questioned stated that they had been discharged from hospital back to the streets.

More needs to be done to enable services to intervene early and prevent people's situations from escalating into crises. We need services that are responsive to support people where and when they need them. We need to ensure that there is better communication between services to enable people to transition from care, prison and hospital into settled accommodation in a planned way.

Many people sleeping rough had lots to say about their current situation and how they got there. It would benefit the development of future services and redesign of current ones to listen to the voices and experiences of these people.

## Background

This report analyses the questionnaires completed during the 2-week information gathering exercise of the Welsh Government rough sleeper count with every person who presented to services that work with rough sleepers.

The questionnaire was developed for the count by the Welsh Government Rough Sleeper Working Group (RSWG); a group of Welsh Government officials, Local Authority and third sector representatives, as well as academics. The Housing Network was consulted on regarding the contents of the questionnaire prior to it being finalised. The purpose of the questionnaire is to allow Local Authorities to develop a local picture of the cohort of people sleeping rough in their area and assist the Local Authority in developing services and responses for people presenting as sleeping rough. It can also help to provide a national picture of the cohort of people sleeping rough at that time and that is the purpose of this report.

The Local Authority Housing Network collated the information from all of the questionnaires completed during the two-week period. Of the 347 incidences of rough sleeping which were recorded during the 2-week count 332 questionnaire responses were received for analysis. Where no questionnaire was received from an individual who engaged with the local authority this was mainly due to that fact that a person presented to services already had accommodation or they did not want to take part. Questionnaires were received from the following Local Authorities as compared to the previous year, some Local Authorities struggled to get partners to engage in the questionnaire exercise and therefore submitted no questionnaires:

<b>Local Authority</b>	<b>Questionnaires returned 2016</b>	<b>Questionnaires returned 2017</b>	<b>Questionnaires returned 2018</b>
Anglesey	0	4	3
Blaenau Gwent	0	0	0
Bridgend	12	14	20
Caerphilly	27	18	29
Cardiff	85	92	99
Carmarthenshire	0	4	2
Ceredigion	6	12	8
Conwy	0	1	0
Denbighshire	12	9	5
Flintshire	0	1	3
Gwynedd	14	34	26
Merthyr Tydfil	13	8	0
Monmouthshire	1	6	2
Neath Port Talbot	1	15	8
Newport	0	22	23
Pembrokeshire	5	8	10
Powys	0	3	2
Rhondda Cynon Taf	0	15	5
Swansea	21	22	28
Torfaen	0	1	4
Vale of Glamorgan	2	0	1

Wrexham	61	45	54
<b>Total</b>	<b>261</b>	<b>334</b>	<b>332</b>

All LAs who carried out questionnaires this year submitted them for analysis and only the following Local Authorities had nil responses:

Blaenau Gwent  
Conwy  
Merthyr Tydfil

The questionnaires were completed based on the responses from the individual being questioned and none of the information given was corroborated.

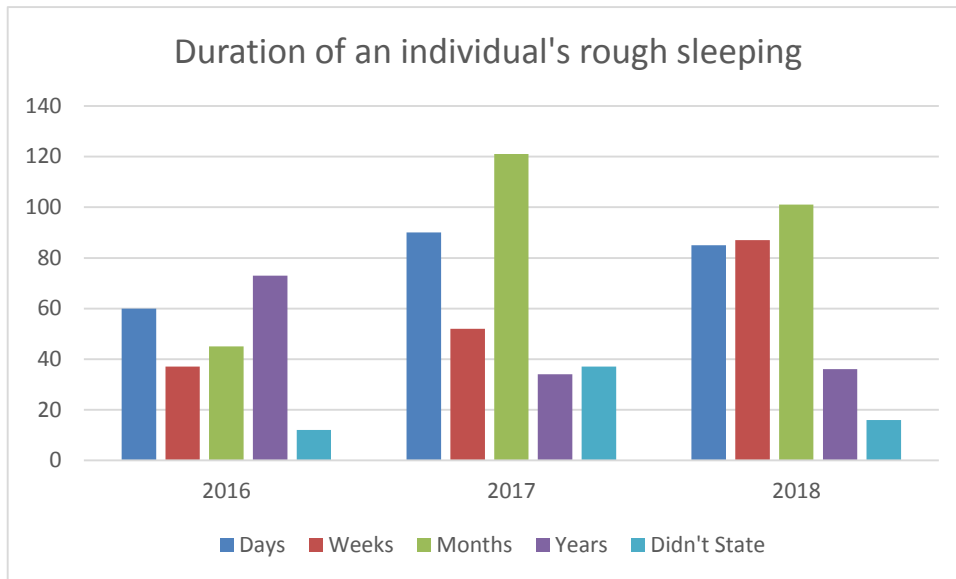
### Analysis of Questionnaires

Of those who had completed the questionnaire, 306 individuals (91%) stated that they had slept out the previous night in comparison to the 24 individuals (7%) who stated that they hadn't. This is almost identical to the findings of 2017 in which 307 individuals (92%) reported that they had slept out the previous night. Of those who reported sleeping rough the previous night, 24 (7%) had slept out as part of a couple or a family unit; an increase of one on the 2017 figure, 23 (7%).

When asked for the duration of their rough sleeping, 85 individuals (25%) reported that it was in the region of days, which is broadly similar to the two previous years in percentage terms, 90 (27%) in 2017 and 60 (23%) in 2016. There has been, however, a notable increase on the previous years in the number reporting that their rough sleeping is in the duration of weeks, at 87 (26%). This constitutes a 10% increase on the 2017 figures, an increase of 35 individuals. Conversely, the number of respondents who have been sleeping out for months has fallen by 6% on the 2017 figures, 20 individuals, whilst the frequency of those reporting that they have slept out for years remains consistent at 10% of those, an increase of 2 individuals.

10 (3%) of the individuals questioned stated that they did have some form of tenancy.

Period slept out for:	Number 2016	Percentage 2016	Number 2017	Percentage 2017	Number 2018	Percentage 2018
Days	60	23%	90	27%	85	25%
Weeks	37	14%	52	16%	87	26%
Months	45	17%	121	36%	101	30%
Years	73	28%	34	10%	36	10%
Didn't state	12	18%	37	11%	16	4%



For 53 individuals (16%) this was their first incidence of sleeping rough, compared to 63 individuals (19%) in 2017, but for 273 individuals (82%) reported that they had slept out on at least one other previous occasion, compared to 263 individuals (79%) in 2017. Of the individuals who completed the questionnaire, 287 (86%) stated that they would like support to stop sleeping out.

Having identified in 2016 that we were missing information on gender the following gives the breakdown of males and females who presented as sleeping rough over the past two years:

	2017	2017	2018	2018
Male	274	82%	272	81%
Female	52	16%	54	16%
Not given	8	2%	6	2%

Of these, 10 females (19%) were sleeping out as part of a couple or family unit, whilst only 15 males (6%) reported sleeping out as part of a couple or family unit.

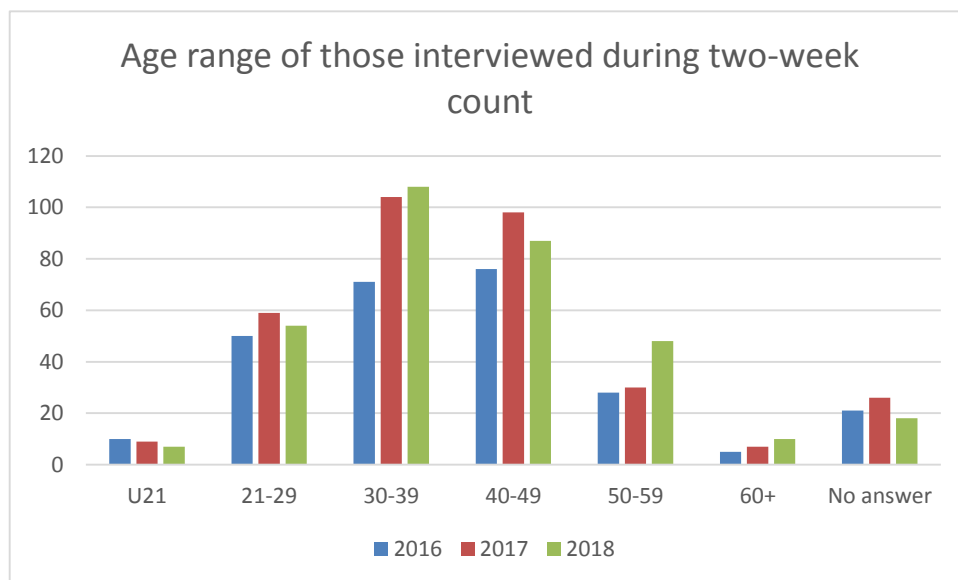
Further analysis of responses from females was carried out and it was found that they came from the following localities:

Type of LA	Number of LAs	Number of females 2017	Number of LAs	Number of females 2018
Urban	4	29	4	28
Semi-rural	6	21	7	23
Rural	2	2	2	3

From the date of birth information collected the ages of those interviewed are as follows:

Age range	Number in 2016	Number in 2017	Number in 2018
60 – 69	5	7	10
50 – 59	28	30	48
40 – 49	76	98	87
30 – 39	71	104	108
21 – 29	50	59	54
Under 21	10	9	7
Not given	21	26	18

As in previous years, the vast majority of individuals presenting are between 21 and 50 years of age. Although there has again been a slight decrease in the number of individuals under the age of 21 presenting, the increasing prevalence of those over the age of 50 sleeping out is surely a case of concern and could certainly benefit from further investigation into the causes of homelessness for this demographic.

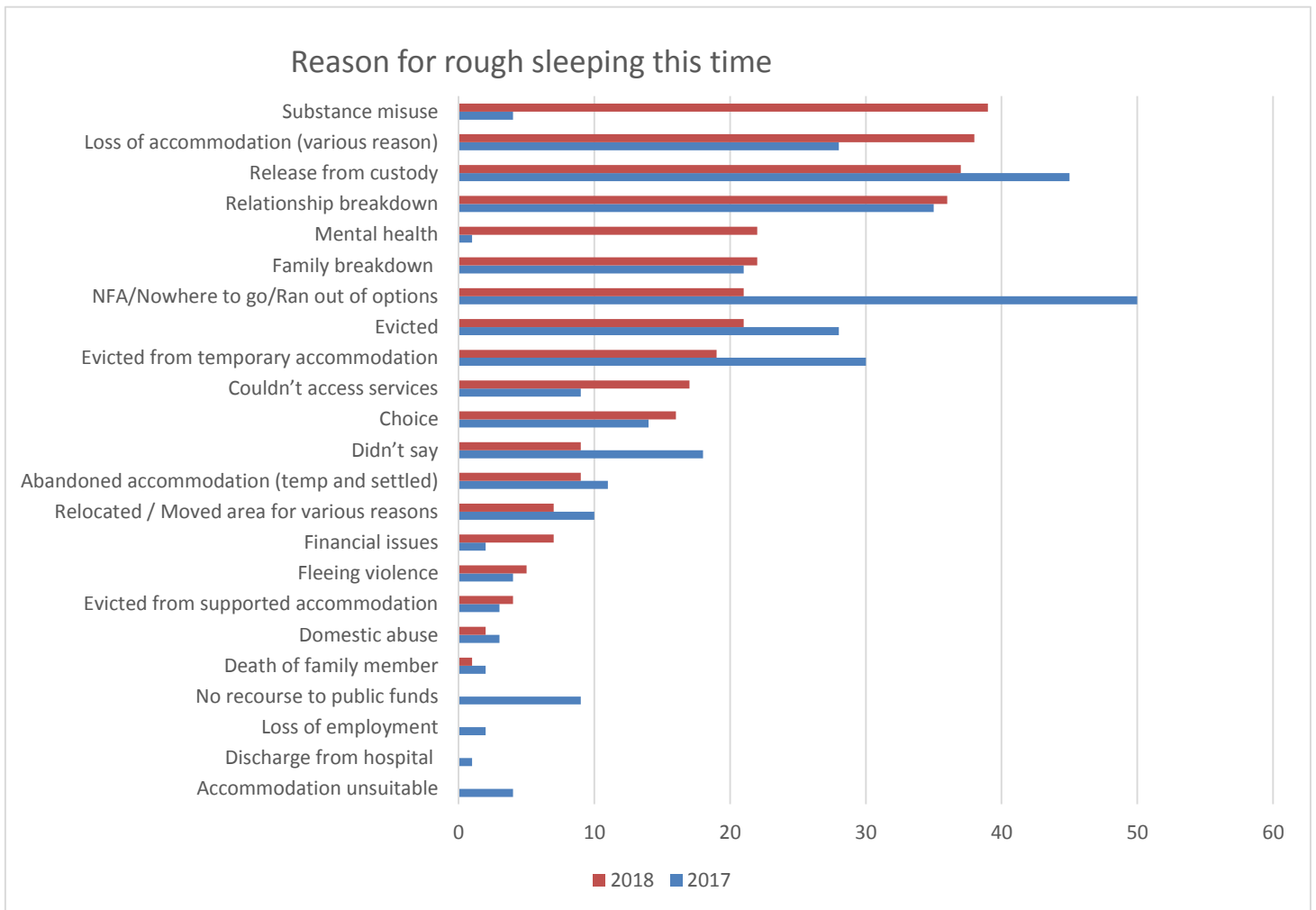


For the second year as part of the questionnaire individuals were asked why they were sleeping rough and what they believed had made them homeless in the first instance. There were many reasons given but they can be basically categorised as follows:

Reason stated for sleeping rough this time:

Reason for sleeping rough this time	Number 2017	Number 2018
Abandoned accommodation (temp and settled)	11	9
Accommodation unsuitable	4	0
Choice	14	16
Couldn't access services	9	17
Death of family member	2	1

Discharge from hospital	1	0
Domestic abuse	3	2
Evicted	28	21
Evicted from temporary accommodation	30	19
Evicted from supported accommodation	3	4
Family breakdown	21	22
Fleeing violence	4	5
Financial issues	2	6
Loss of accommodation (various reason)	28	38
Loss of employment	2	1
Mental health	1	22
NFA/Nowhere to go/Ran out of options	50	21
No recourse to public funds	9	0
Relationship breakdown	35	36
Release from custody	45	37
Relocated / Moved area for various reasons	10	7
Substance misuse	4	39
Didn't say	18	9



From the above figures, it is evident that the reasons for an individual sleeping rough on this occasion appear more varied than in the previous year. It remains that an

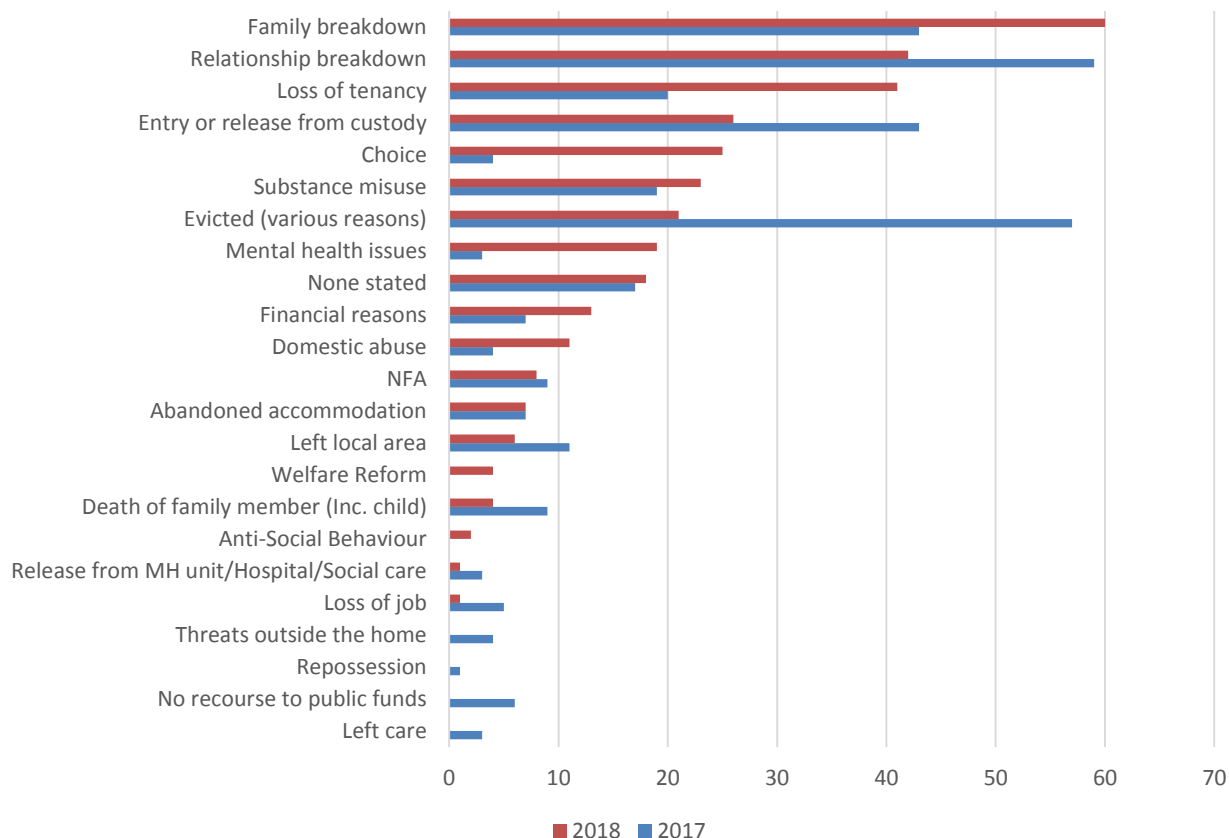
individual being evicted from or losing their accommodation, including temporary and supported accommodation, remains the primary reason for rough sleeping, at 82 instances, this is, however, down on the previous year. Again, despite the 'National Pathway for Homelessness Services to Children, Young people and Adults in the Secure Estate', there is still a large number of people sleeping rough who have been in custody, at 37 instances, which is a slight decrease from last year. Breakdown in relationships with either their partner or family members' remains a consistent reason for an individual's homelessness at 36 and 22 instances respectively. There has, however, been a substantial increase in the relative frequency that individuals cited either their substance misuse, at 39 instances, or their mental health issues, at 22 instances, as the instigating factor in their rough sleeping, which is of concern as it might be assumed that these individuals may fall into a priority need category. Furthermore, it may also be assumed that the individuals fleeing violence or domestic abuse, at 7 instances and those experiencing a death of a family member, 1 instance, may also fall into a priority need category which is further cause for concern.

Individuals were also asked to identify what they thought was the initial reason for them becoming homeless. The reasons given are as follows:

<b>Reason for loss of last settled accommodation</b>	<b>Number 2017</b>	<b>Number 2018</b>
Abandoned accommodation	7	7
Anti-Social Behaviour	0	2
Choice	4	25
Entry or release from custody	43	26
Death of family member (Inc. child)	9	4
Domestic abuse	4	11
Evicted (various reasons)	57	21
Family breakdown	43	60
Financial reasons	7	13
Left care	3	0
Left local area	11	6
Loss of job	5	1
Loss of tenancy	20	41
Mental health issues	3	19
NFA	9	8
No recourse to public funds	6	0
Relationship breakdown	59	42
Release from MH unit/Hospital/Social care	3	1
Repossession	1	0
Substance misuse	19	23
Threats outside the home	4	0
Welfare Reform	0	4
None stated	17	18



### Reason for loss of last settled accommodation



Loss of accommodation, be it via eviction or other reasons, remained the most frequent instigator of an individual’s loss of last settled accommodation at 62 instances, whilst a breakdown in relationship with either a partner or a family member also remained high at 42 and 60 instances respectively. Yet again, entry or release from custody is a large reason for people becoming homeless at 26 instances. In line with the reasons given for an individual’s current rough sleeping, there has been a significant increase in the frequency that mental health issues have been cited as the primary reason for an individual’s loss of last settled accommodation, at 19 instances. This perhaps reflects both the increasing complexity of each individual’s situation but also our greater understanding of mental health issues as a society. There has also been an increasing frequency in the number of times an individual cited their own choice as the instigating factor, at 25 instances, and for the first time welfare reform was cited as the primary reason, at 4 instances.

Those interviewed were asked about their previous life experiences with regards to potential priority need categories. Again these results are based on the individuals’ responses. The responses are as follows:

Previous history	Number in 2016	Number in 2017	Number in 2018
Care	13 (5%)	54 (16%)	40 (12%)
Custody	85 (33%)	140 (42%)	145 (43%)

Armed forces	3 (1%)	9 (3%)	8 (2%)
Care and Armed Forces	2 (0.8%)	1 (0.3%)	2 (0.6%)
Care and Custody	8 (3%)	37 (11%)	23 (6%)
None	149 (57%)	158 (47%)	151 (45%)
Didn't say	1 (0.4%)	6 (0.8%)	11 (3%)

In 2016 it was not known what the time lapse was between the above incidences and the incidence of sleeping rough and so the questions were modified in 2017 to identify those who had been released from custody within the last 3 years and what the timing of this was. Of those who had been released from custody, 43 (29%) stated that they had been released within the previous 12 months, and 21 (14%) stated that it was in the previous 3 months, although the actual figure has potential to be significantly higher due to problems with data collection.

Despite the introduction in 2014 by Public Health Wales of the Hospital Discharge Protocol for Homeless People in Wales:

[http://www.publichealthnetwork.cymru/files/5214/4613/4011/Hospital\\_Discharge\\_Protocol\\_for\\_Homeless\\_People\\_in\\_Wales\\_John\\_Bradley\\_Rhiannon\\_Hobbs\\_2014.pdf](http://www.publichealthnetwork.cymru/files/5214/4613/4011/Hospital_Discharge_Protocol_for_Homeless_People_in_Wales_John_Bradley_Rhiannon_Hobbs_2014.pdf)

123 individuals (37%) questioned reported that they had been discharged from hospital to no fixed abode compared to 66 individuals (20%) in 2017, with 21 individuals (6%) reporting that this was within the previous 12 months. This is certainly a worrying trend as it appears the introduction of the protocol has done little to reverse homeless individuals being discharged from hospital to no fixed abode.

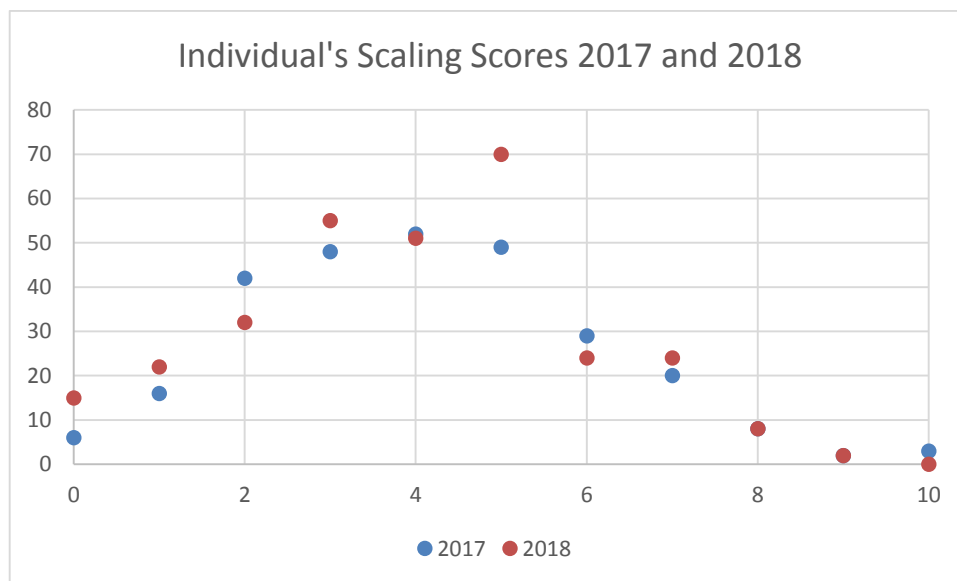
Of those asked, 182 individuals (54%) disclosed that they have a mental health issue compared to 142 individuals in 2017. Of the 182 individuals, 113 (62%) had a medical diagnosis; 14 individuals (12%) had been diagnosed in the past 12 months, 32 individuals (28%) in the past 3 years, and 60 individuals (53%) had been diagnosed over 3 years ago. 7 individuals (6%) didn't specify a time frame for their diagnosis. Of all those who completed the questionnaire, 94 (28%) reported that they had never had a mental health diagnosis whilst 39 individuals (12%) preferred not to answer. Of those disclosing that they have a mental health issue, 57 individuals (31%) reported that they were receiving some form of support or medication whilst 70 individuals (38%) stated that they had previously been hospitalised due to their mental health. These figures are broadly similar with last year's questionnaire, however, in percentage terms there is some variation. In 2017, 61 individuals (43%) who had a mental health diagnosis were in receipt of support or medication, so in percentage terms this has dropped substantially whilst the figures for those admitted to hospital for their mental health at 76 individuals (53%) has also dropped in percentage terms.

Building on the questions asked into individual's physical health from last year's questionnaire, 110 individuals (33%) disclosed that they had a diagnosed physical health condition compared to the 88 individuals (26%) from 2017. Of the 110 individuals, 20 individuals (18%) stated they had been diagnosed in the past year, 14 individuals (12%) in the past 3 years and 26 individuals (23%) had been diagnosed over three years ago. 50 individuals (45%) did not specify the time-frame of their diagnosis whilst 23 individuals (6% of 332) did not want to answer. Again, those in receipt of medication or support has fallen. In 2017, 76 individuals (86%) reported receiving some form of medication or support for their physical health condition

which is in stark comparison to this year's figures of 46 individuals (41%) receiving support.

As part of the questionnaire individuals were asked to rate how well they felt on a scale of 0-10:

Scaling score	Number	Percentage
0	6	2%
1	16	4%
2	42	12%
3	48	14%
4	52	15%
5	49	14%
6	29	8%
7	20	6%
8	8	2%
9	2	0.6%
10	3	0.9%
Didn't state	57	17%



Number of people quoting each scaling score

Following on from recommendations identified after the 2016 questionnaire it was felt that more needed to be understood about where people who were sleeping rough originated from. People were asked the following regarding their ethnicity and nationality. The responses are as follows:

Ethnicity	Number 2017	Percentage 2017	Number 2018	Percentage 2018
White	310	93%	293	88%
Black	3	1%	5	1%
Asian	0	0	3	1%
Mixed	3	1%	9	3%

Other	0	0	0	0
Undisclosed	18	5%	22	7%

The table below shows the stated nationalities of those questioned. 246 people (73%) stated that they had a nationality within the UK and Ireland. Of the remaining people asked the vast majority didn't state their nationality.

Nationality	Number 2017	Percentage 2017	Number 2018	Percentage 2018
British	155	47%	133	39%
Welsh	88	26%	101	30%
English	17	5%	10	3%
Irish	4	1%	2	1%
Asian British	1	0.3%	0	0
Czech Republic	1	0.3%	0	0
Polish	8	2%	7	2%
Portuguese	2	0.3%	0	0
Sudanese	0	0	1	>1%
Nigerian	0	0	1	>1%
Zimbabwean	1	0.3%	0	0
Lithuanian	0	0	1	>1%
Didn't state	55	16%	75	21%

Following on from the 2016 exercise it was also felt that more needed to be understood about individuals' local connection to the area they were presenting in and /or where people had previously been living. For this purpose people were asked to say what their last settled address had been. Of those questioned 156 (49%) stated that their last settled address was in the Local Authority in which they were presenting.

Local connection	Number 2017	Percentage 2017	Number 2018	Percentage 2018
Local connection in presenting LA	202	60%	156	49%
Local connection in another LA in Wales	39	12%	37	10%
Local connection in rest of UK	25	7%	10	2%
Connected to Europe	8	2%	8	2%
Connected to Rest of the World	0	0	0	0
Didn't state	60	18%	122	37%

## Conclusions

- There has been a less than 1% decrease in the number of questionnaires completed during the two-week count compared to 2017, with the actual numbers falling from 334 to 332. This is broadly in line with Welsh Government's rough sleeping figures that has an increase of less than 1% with the actual numbers rising from 345 to 347.
- Although the number of individuals who stated that they had been sleeping rough for years remained at the same level as last year, 10%, it is promising to see that the number of individuals whose rough sleeping has lasted 'months' has fallen from 36% to 30%.
- As in the two previous years the vast majority, 86% of respondents, stated that they would like help to stop sleeping rough. This ranges from signposting to accommodation providers and providing financial support to providing a home and support to deal with additional issues such as substance misuse or mental health problems.
- As in the two previous years, the majority of people sleeping rough are male. Of those females who are sleeping rough most are in urban or semi-urban Local Authorities. This may highlight a need for female specific services in these areas.
- Unlike the two previous years, the majority of people questioned were under the age of 40, with the age range of 30-39 being the most well represented, with 33% of all respondents. It is also worrying to see an increase in the numbers of individuals sleeping rough over the age of 50. Although there has been a slight decrease in the numbers of people under the age of 30 sleeping rough, it is still concerning that there are a number of individuals (7) under the age of 21 who are sleeping rough.
- From the figures it can be seen that, in line with the previous two years, eviction or loss of tenancy for various reasons is the most frequent reason for people sleeping rough on this occasion. This includes a range of accommodation options including temporary and supported accommodation. It is also clear that many individuals have exhausted all other options including sofa surfing and ended up sleeping rough. Relationship and family breakdown is also a common reason for people finding themselves sleeping rough. There has also been a substantial increase in the number of individuals who cited their mental health or substance misuse issues as the instigator of their rough sleeping.
- Despite the "National Pathway for Homelessness Services to Children, Young People and Adults in the Secure Estate" there are still a large number of people sleeping rough who have recently been in custody. Of those individuals who stated the time of their release, nearly all of respondents had been released in the past three years, and 49% had been released in the past 12 months. It is hoped that the recommendations from the recent Welsh Government commissioned research by Glyndwr University will be acted upon to break this cycle. Furthermore, the creation of the role of 'LDU network co-ordinators' will hopefully go some way to improve relationships between Probation, Resettlement and Housing Options teams.
- Domestic abuse and fleeing violence although smaller numbers continue to be of concern as are mental health, substance misuse, death of a family

member and discharge from hospital as it might be assumed that these individuals may fall into a priority need category.

- As in previous years a large proportion also stated that they had been in care in the past and a significant number stated that they had experienced both care and custody. This might affect how we develop and deliver services for care leavers in the future.
- 37% of those questioned stated that they had been discharged from hospital to no fixed address and went back to sleeping rough. This is particularly worrying as this an increase of 17% on the previous year.
- A growing number of individuals cited their mental health issues as the reason for them becoming homeless or sleeping rough and the number of individuals identifying as having some sort of mental health issues is also increasing. Of those disclosing a mental health issue, only 31% reported being in receipt of support or medication, which is a fall from 43% on the previous year, which is obviously a worrying development. There may be a need for a different or further question regarding mental health to understand which issue came first; homelessness or mental health problems.
- A large number of individuals also stated that they had a physical health condition and worryingly again the number of those in receipt of support or medication has fallen drastically from 86% to 41%. It would be useful to understand what has instigated such a dramatic fall and the potential barriers to rough sleeping individuals from accessing the required services.
- As in previous years the majority of people rated their feeling of wellness at 5 or below. It might be useful in future years to compare this with some kind of control group to see how this might differ.
- Similar to previous years, the vast majority of respondents were white and from somewhere within the UK. The majority of other people who stated a nationality came from within Europe.
- Just under half of the respondents tended to sleep rough in the area to which they had a local connection. Where this was not the case the person was often from a neighbouring Local Authority or a near one within Wales.

## Recommendations following the questionnaires

- Work with all partners to better understand the causes and consequences of substance misuse to better meet the needs of people who identify this as a contributing factor to their rough sleeping
- Share good practice of embedding mental health practitioners (CPNs etc) in Housing Options and support services to better understand the needs of those presenting with a mental health need
- Further work to understand the impacts of Welfare Reform on those who end up sleeping rough
- Continue to work with HMPPS, the newly appointed pathway co-ordinators and the regional prisoner resettlement groups to improve outcomes and reduce rough sleeping for those coming out of custody
- Improve the delivery of the hospital discharge protocol to reduce the number of those sleeping rough directly from hospital. More work needs to be done between hospital wards and housing options teams to ensure that the Hospital Discharge Protocol is followed when a homeless person is being discharged from medical care. The provision of hospital discharge specific homeless prevention officers should help to try to prevent this trend.
- Identify the barriers to accessing support for mental and physical health conditions for those sleeping rough
- Understand the reasons for the majority of rough sleepers identifying a desire to receive support and yet not believing they have received it. Potential for a further question in future questionnaires
- Develop innovative ways of providing a range of services and engaging with rough sleepers where they are; such as multi-agency teams (including medical professionals), welfare vehicles, out of hours provision
- Study the reasons for eviction of those sleeping rough in order to improve outcomes for others in the future. This could be a follow up question in future questionnaires.

## Comments on the Welsh Government's Rough Sleeping Action Plan

Where feedback is available, comments have been added following each relevant point of the Action Plan.

### Prevention

2. Conduct research to understand the causes of the recent increase in rough sleeping and identify opportunities to improve its prevention, including the role and suitability of emergency and temporary accommodation. (By July 2018)

**Comment: It is unclear whether this has happened and whether any research was published.**

3. Promote the prevention of rough sleeping through emergency housing arrangements and maximising the effectiveness of homelessness prevention under s66 of the Housing (Wales) Act 2014, and, where rough sleeping cannot be prevented, support a no second night out approach.

**Comment: The numbers of people still sleeping rough in some Authorities whilst 'emergency housing units' are left vacant, suggests that what's on offer is not always suitable to those in need. No initiative such as no second night out has been introduced as of yet.**

4. Promote and engage with the work being undertaken to reduce the impact of Adverse Childhood Experiences (ACEs), to help address contributory factors to rough sleeping in later life. This will include training for workers in trauma informed practice and related skills to help them to support rough sleepers with an appropriately sensitive and empathetic approach. (By December 2018)

**Comment: It is positive that much work has taken place with supporting the 3<sup>rd</sup> sector to embrace this crucial area of our work, but it isn't clear how much work has been done to embed this into statutory services. Implementing PIEs is currently not an eligible activity, it really needs to be in the new HSG.**

### Support

5. Foster, through guidance and advice, the application of Supporting People resources to support rough sleepers into accommodation and to help them sustain that accommodation in order to help them avoid further rough sleeping. (From April 2018)

**Comment: We positively welcome the shift towards more SP contracts being tenure neutral, subsequently allowing services to work with rough sleepers. We welcome any move that frees providers up to spend funding in ways that can be demonstrated as having most impact.**

6. Promote services which help build the skills and confidence of rough sleepers and help them to access training and employment, including day services. This will include a report on effective practice. (By December 2018)



**Comment: With regards to the report on effective practice of rough sleepers accessing training and employment – it's not clear whether such a report was issued.**

**Widening the eligible activity scope of SP contracts would enable providers to offer more of this type of support.**

7. Encourage the development of peer support to help rough sleepers move away from the streets, including training for peer mentors. (From April 2018)

**Comment: We have not noticed any particular drive in encouraging this type of crucial support across LAs in Wales.**

8. Promoting a positive message to the public about the best way to help a rough sleeper, and raise awareness of the difference between street based activity and those who are actually homeless. (From October 2018)

**Comment: It'd be good to get some examples of, or clarity around, how this has been done at a systemic level.**

**Little to no evidence exists that suggests diverted giving schemes have any significant impact on the public's response to begging, and inappropriate messaging can be detrimental to the homeless community, yet some LAs have been hasty in their attempts to set such schemes up without thorough planning and preparation.**

**Messaging from within LAs into the public domain has been insensitive and has ultimately exacerbated the negative stereotypes and stigmas held against homeless people.**

### **Outreach**

9. Promote assertive outreach services and a case management approach to help each individual rough sleeper to secure accommodation, supported by an appropriate IT system. (From March 2019)

**Comment: We encourage the development of assertive outreach through mobile provision and openness to innovation from the third sector, for example; Safe Space.**

### **Emergency Accommodation**

11. Ensure access to safe emergency accommodation with support is available throughout the year, by widening the range of provision and improving move-on to release bed spaces. This should be evidenced in statutory homelessness reviews and strategies. (From January 2019)

**Comment: Some of the systems and referral processes set up to facilitate access to residential provision can at times cause delays in allocating people to beds resulting in unacceptable and unnecessary void levels.**

12. Review severe weather plans and ensure they all offer appropriate protection and support for rough sleepers, and proactively help them to access more suitable housing and support. (By March 2018 and November 2018)

**Comment: Some LAs' SWP only become active upon there being 2 nights of adverse weather/temperatures. SWP provision should be initiated so that people are prevented from having to sleep rough in any severe weather.**

### Housing First

13. Encourage the application of Housing First principles (and review experiences of implementation) to enable rough sleepers to find settled accommodation, including the use of individual budgets to aid resettlement and incentives to improve access to the private rented sector. (By October 2018)

**Comment: We welcome the roll out of trailblazer funding and the commitment to HF. However, there remains disputes between RSLs and support providers on the legalities surrounding flexible substance misuse policies. The could potentially undermine the national roll out of HF.**

### Legislation and statutory guidance

14. Require local authorities to review the needs of rough sleepers in their area and plan to meet their needs within their local homelessness strategies to meet duties under ss50-52 of the Housing (Wales) Act 2014. Planning should include addressing the needs of women, couples, and people with pets. (By December 2018)

**Comment: Local Authorities are encouraged to embrace the agility of the third sector. The Wallich acknowledges the magnitude of this challenge. The third sector wants to support more through co-production.**

15. Provide stronger statutory guidance on rough sleeping, to ensure effective application of homelessness legislation to improve outcomes for rough sleepers. This will include clearer guidance on assisting those with no local connection, to ensure they receive personalised assistance to secure accommodation. (By July 2018)

**Comment: We are not aware of any such guidance being provided, but we feel strongly that it is required.**

16. Consider the case for amending secondary legislation to modify priority need groups, including rough sleepers. (By January 2020)

**Comment: We are unaware of any progress with this, but we very much welcome its consideration going forward.**

### Measuring and Monitoring

18. Review the annual national two week data gathering exercise to ensure appropriate details are collected of people claiming to be sleeping rough to assist policy development. By July 2018

**Comment: It is unclear whether such a review has taken place, and if so, what impact the review had.**

### **Funding**

19. Provide funding to drive a reduction in rough sleeping, encouraging innovative approaches to tackle the problem, including incentives for private landlords. (From February 2018)

**Comment: With regard to incentives for private landlords, it is unclear whether work on this has taken place. More information on this would be useful.**

**The new money that has been made available is welcomed, but the unknown/short term nature of it does impact on how effectively it can be used. We urge a shift towards all funding being awarded on longer term arrangements.**

20. Invest in accommodation solutions and services specific to the needs of young people as alternatives to sleeping rough, working with the End Youth Homelessness Partnership. (From February 2018)

**Comment: Innovation has been stifled due to a lack of appropriate land being made available.**

### **Joint working**

21. Improve access to health and substance misuse services for rough sleepers, through improved implementation of the Welsh Government's Health Standards for Homeless and Vulnerable Groups. This will include development of model joint working protocols for engaging mental health and substance misuse services with rough sleepers. (From April 2018)

**Comment: We are unaware of any significant shift in such services becoming more accessible.**

22. Strengthen pathways between services across local authorities, voluntary agencies, health and housing sectors, to ensure that staff have sufficient awareness and training to appropriately signpost and enable individuals to navigate through the system to access the help they need. (From April 2018)

**Comment: Prisoner Pathway still appears to be ineffective.**

### **Promoting Good Practice**

24. Convene a national conference on rough sleeping to explore best practice across the UK and internationally. (By November 2018)

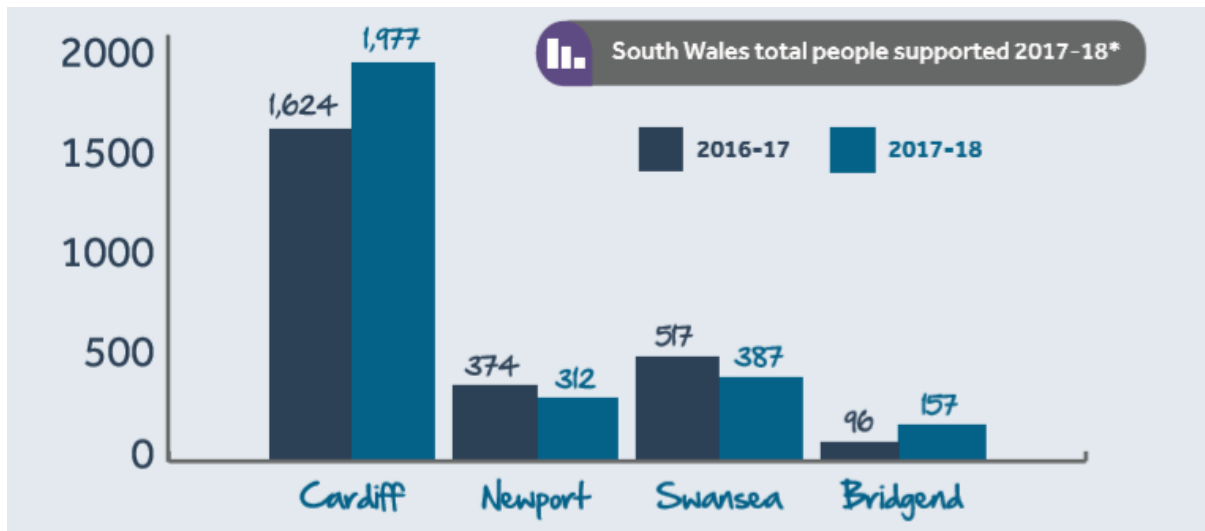
**Comment: We are unaware of any progress on this point.**

## **Inquiry into rough sleeping – numbers and demographics**

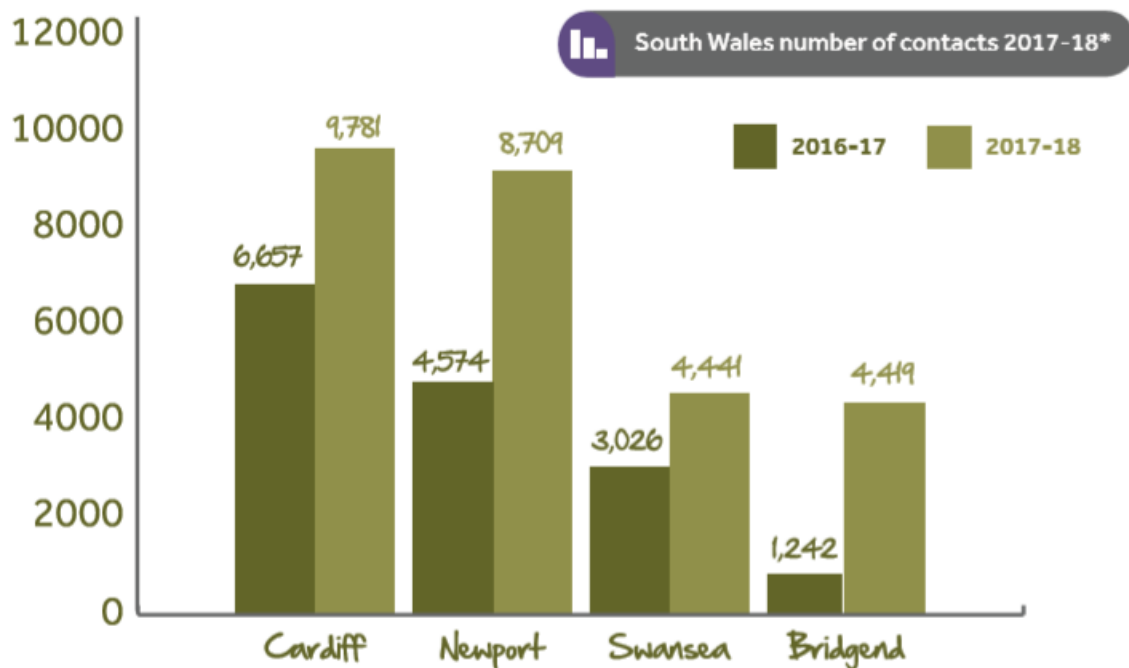
Data comes from The Wallich's recently published South Wales Street Based Lifestyle Monitor, available online here: [https://thewallich.com/wp-content/uploads/2019/02/SBL\\_Report2018.pdf](https://thewallich.com/wp-content/uploads/2019/02/SBL_Report2018.pdf)

## Numbers

The number of people seen by the Rough Sleeper Intervention Teams in South Wales increased by 9% from 2016-17 to 2017-18.

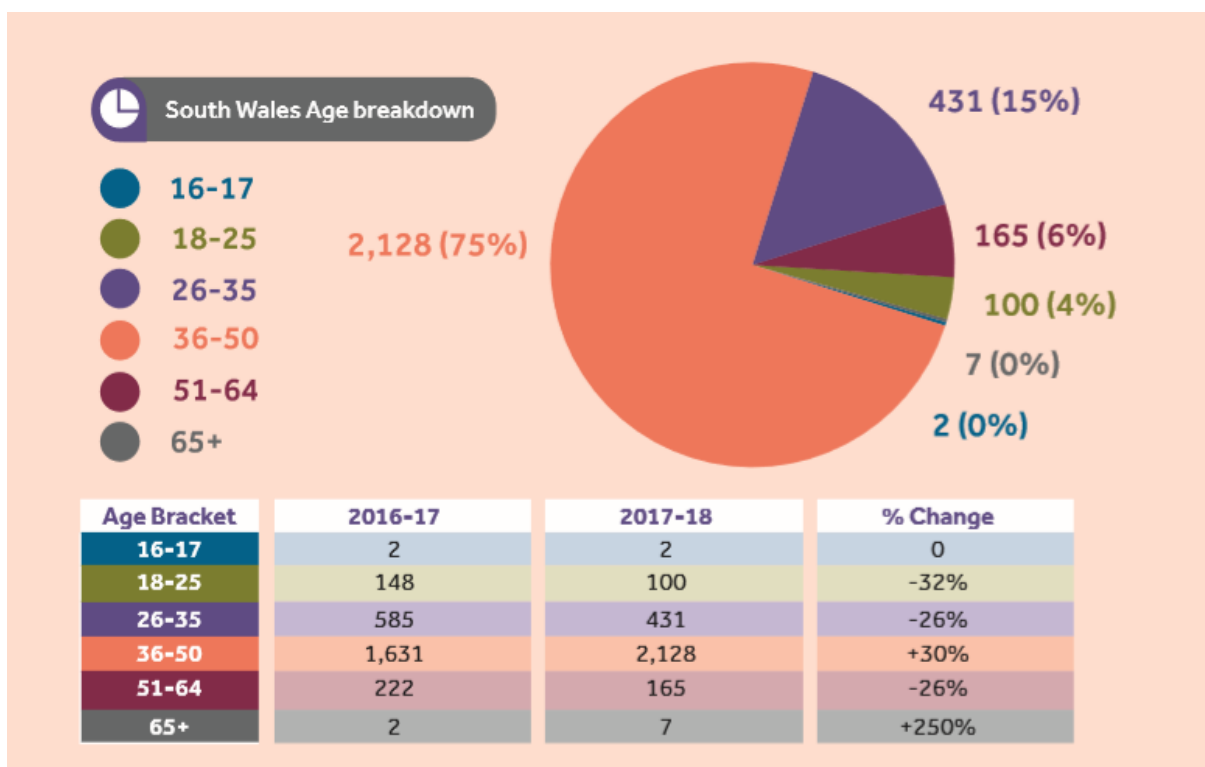
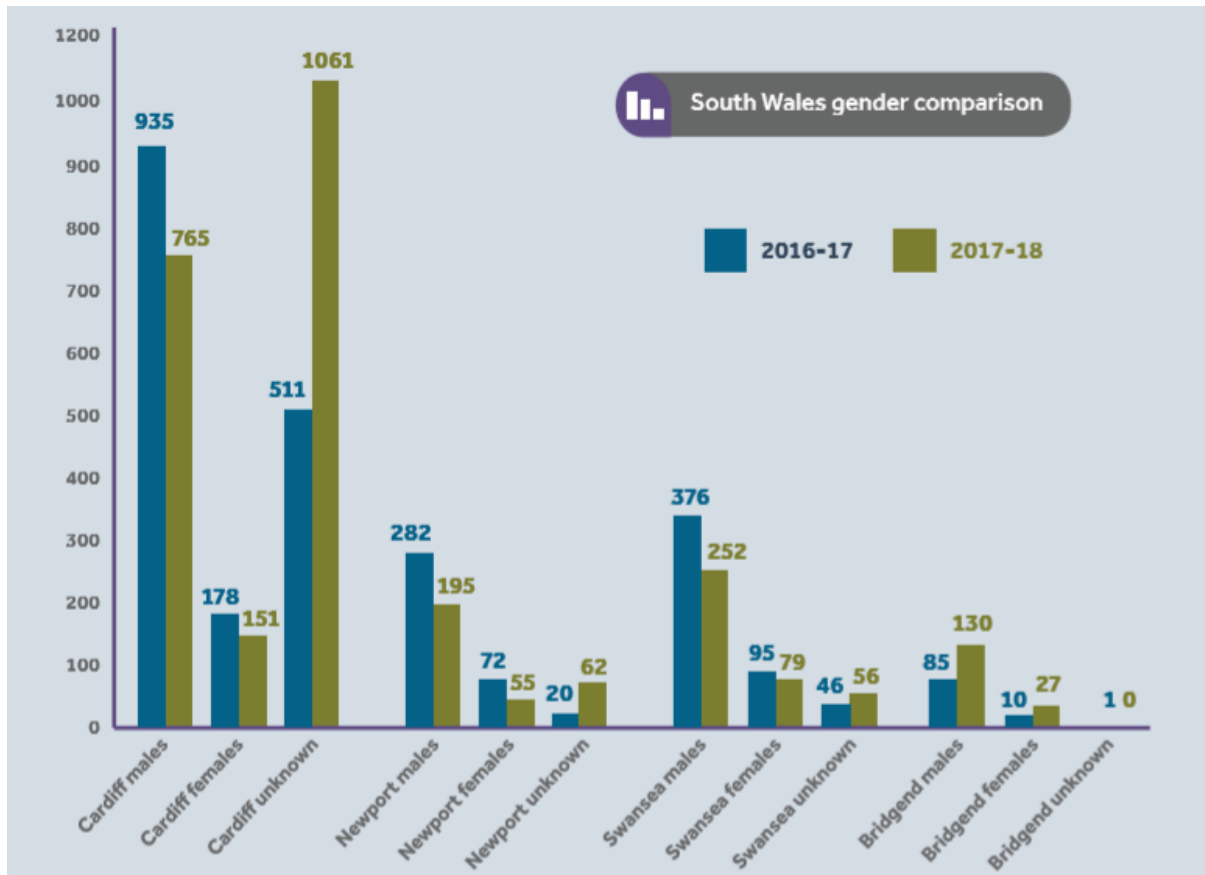


The number of contacts recorded between 2016-17 and 2017-18 rose by 74%. 'Contacts' refer to any engagement made between the team and a person, and as such, the same people can be counted several times. The table below clearly demonstrates that the extent of rough sleeping has increased significantly.



## Demographics

As standard, we publish data about the age and gender of our clients.



### **Perceived demographics of NRPF clients**

We recently carried out some internal research about NRPF clients – not just people sleeping rough, it should be noted, though they all would have a vulnerable housing situation.

#### *Cardiff:*

Mostly males (as high as 90%) with quite a wide age range of 20-60 from Eastern Europe; countries include Poland, the Czech Republic, and Lithuania.

#### *Newport:*

One service mentioned predominantly males over 35, from a variety of countries. Another said: demographics seem to include Polish people, some middle aged and some younger – around twenty.

#### *Swansea:*

Mostly Eastern Europeans

Document is Restricted

## Introduction

1. Disability Wales/Anabledd Cymru (DW) is the national association of disabled people's organisations in Wales striving for the rights and equality of all disabled people, including for independent living. Our core role is to reflect the views of our members to Government with the aim of informing and influencing policy.
2. Disability Wales subscribes to the Social Model of Disability, by which we mean that "disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others" (*UN Convention on the Rights of Disabled People*). Disability Wales has been at the forefront of campaigning for disabled people in Wales to have the right to Independent Living.
3. Disability Wales welcomes this opportunity to respond to this inquiry on the Welsh Blue Badge Scheme. This response has been informed by the view and experiences of disabled people. In writing, this response we have consulted with disabled people through an online survey which received 136 responses and a focus group attended by disabled people.

## Extending Eligibility Criteria

4. Our survey results showed a mixed response to whether the Blue Badge Scheme should be extended in Wales. 49 per cent of respondents to our survey thought that the current eligibility criteria for Blue Badges should be extended.

*"Include diagnosis of autism, I had to go in depth to explain how my daughter's condition affects her mobility day to day and how we need the larger spaces etc. It's annoying I had to get a letter off a specialist health visitor to back us"*

5. We welcomed the extension to eligibility in 2014, which widened eligibility for people with autism and more recently the introduction of temporary blue badges. Our survey results suggest that public awareness of this extension is low. As many respondents were unaware that people with autism or mental health conditions could now be eligible for a Blue Badge.
6. Since the 2014 extension, many disabled people have lost automatic entitlement to their Blue Badge due to changes in the level of Personal independence Payment (PIP) that they receive. We would welcome a review of the eligibility criteria that helped clarify the entitlement of people with long term health conditions and / or impairments that may no longer be entitled to PIP.



*“Currently we are unable to access activities and days out other families can. A blue badge would reduce the barriers and allow us to access more opportunities. This is the case across Wales but not? just our family”*

7. Extending the eligibility of the Blue Badge scheme would allow more disabled people to easily access leisure, retail and work opportunities, reducing social isolation and loneliness. However, with more badges in circulation, the number of accessible parking bays would also need to increase.

### **The Practical Implementation and Consistency of the Blue Badge Scheme across Wales**

*“We were refused as my son is not physically disabled. They didn't consider that a disabled badge would make life less dangerous for me and him being able to park closer and having more room. He kicks and punches cars if they park too close and tends to not leave the car if we are too far away”*

8. Many respondents without automatic entitlement to a Blue Badge experienced difficulties in applying for their badge. There appears to be a postcode lottery in Wales in relation to how discretionary applications are assessed across local authorities. This is particularly the case for people with autism.

*“When my son was under 3 and a wheelchair user I was told there was no way I could have a blue badge without full mobility element of DLA which I could not apply for till he was three. This made life very difficult for us”*

9. There seems to be inconsistencies relating to the eligibility criteria set for Blue Badges and the information provided by local authorities. Parents of disabled children have reported being told that their children were too young to receive a Blue Badge, despite having an impairment or health condition and being over the age of two.
10. We understand the need for discretion when assessing eligibility for people without automatic entitlement to a Blue Badge. However, the current inconsistencies across Wales in how applications are assessed is not working for some disabled people. We would like to see the guidance to local authorities in relation to assessments of discretionary badges strengthened. A review of the assessment process would ensure that assessments of discretionary badges are consistent across Wales.
11. We have also noticed inconsistencies in the way Blue Badges are renewed. Some of our members with long term health conditions and / or impairments are having to undergo a full assessment when renewing

their Blue badges. In situations where an individual has a long-term progressive health condition or impairment, we would welcome the award of badges for a period longer than three years that reflects the fact that the condition will not improve.

*“I sent evidence needed using my smart phone. Took photos of PIP evidence and ID and emailed it to the council all using my phone. I didn’t have to attend the Council office like last time. It was a much easier process for me than trying to find time to get there and find accessible parking space. Difficult last time”*

12. The majority of respondents to our survey applied for their Blue Badge in person at their local Council Offices (39 per cent). When asked how they would prefer to apply 63 per cent of respondents stated they would prefer to apply online.
13. Although the majority of respondents preferred online applications, it is important to note that many disabled people do not have access to the internet, therefore a range of applications options should be made available.

*“They are well monitored in town etc. by traffic wardens but supermarkets etc. have a long way to go. Businesses need to monitor their spaces not just provide and then ignore”*

14. 76 per cent of respondents thought that Blue Badge spaces are not monitored well. Our members told us that they are often unable to park due to non-blue badge holders occupying accessible parking spaces.
15. We would like to see stronger enforcement levers used against drivers who park in accessible parking bays without displaying a blue badge.
16. 47 per cent of respondents reported experiencing difficulties when parking with their Blue Badge. These difficulties range from problems in finding a space due to a lack of accessible parking bays, receiving abuse from members of the public when using their Blue Badge to park and non-badge holders taking up accessible parking bays.
17. Our survey respondents highlighted issues with the lack of accessible parking bays with extra space to allow easier wheelchair / mobility scooter access. One member who uses a mobility scooter explained that she did not necessarily require a parking space close to the building, but one with enough space for her to transfer easily from her scooter into the car, for example. Clearer guidance on the amount and size of accessible parking bays should be made available to local authorities and organisations with car parking facilities.

*“Some people challenge me as I don’t ‘look’ disabled - people still think it’s for wheelchair users”*

18. We are concerned about the number of disabled people experiencing abuse from members of the public when using their Blue Badges. It is not acceptable that disabled people are being victimised for using a facility they are entitled to. We would like to see a public awareness campaign aimed at reducing discrimination towards disabled people. From our survey results we have noticed this abuse is particularly targeted at people with hidden impairments and health conditions. It is important that any public campaigns features a range of disabled people with varying impairments and health conditions.

### **The Support and Information That is Available to Blue Badge Applicants in Wales**

*“I was told I could apply. When I applied I was told no because my son wasn't physically disabled - so in fact I couldn't apply”*

19. 28 per cent of respondents to our survey felt that they did not have adequate access to information and advice when applying for their Blue Badge.

*“I wish I had known earlier that I didn't need a PIP decision to be eligible for one. I had been avoiding completing a PIP application as I knew how bad it would be, but was really struggling to walk, and to get out of the car in tight spaces. When the physiotherapist at the hospital said her medical report would be enough I could have cried”*

20. Many respondents reported being told by their local authority that they were not eligible for a Blue Badge as they did not receive DLA or PIP. It is clear that incorrect advice and information is being offered to members of the public in relation to eligibility criteria. Inconsistent information will prevent disabled people from applying for a Blue Badge and can contribute to loneliness and social isolation. It is important that all advisors and assessors are aware of current eligibility criteria to ensure that prospective applicants receive the correct information and that assessments are completed correctly. Additionally, more needs to be done to raise awareness of eligibility criteria amongst the public.

*“They didn't want to pay for BSL interpreter for interview. But email communication was eventually accepted as a way of application”*

21. Our members highlighted a number of issues they faced when accessing information on the Blue Badge application process. Firstly, members with a vision impairment were not able to access digital information on the scheme because, a) the file format was not compatible to screen-reading software and, b) they did not have access

- to the internet where most information on the scheme is held. Secondly, members with learning difficulties were reliant on other people to interpret the information as easy-read versions were not readily available. Thirdly, disabled people asked to attend a face-to-face interview were not provided with appropriate communication support.
22. We would like to see information relating to Blue Badges made available in alternative formats. These should include; accessible digital versions (word format), easy-read, British Sign Language videos and printed accessible materials for people without internet access. Furthermore, it is not acceptable that disabled people are being refused access to communication support when asked to attend a face-to-face assessment. Under the Equality Act 2010 local authorities have a duty to provide reasonable adjustments which would include providing appropriate communication support and information in alternative formats.

## **Conclusion**

23. Overall, the majority of respondents to our survey (80 per cent) were satisfied with their experience of applying for and using their Blue Badge in Wales.
24. There is a clear need for improvements to the scheme including; better access to accessible information and increased enforcement of parking bays. We would like to see improvements to the information provided to the public by Local Authorities in relation to eligibility criteria. In addition, clear guidance needs to be issued to Local Authorities to end the current postcode lottery system and ensure assessments are carried out consistently across Wales.
25. Lastly, we would encourage the launch of a public campaign to raise awareness of the Blue Badge Scheme and eligibility criteria, which may help increase applications and reduce abuse from members of the public towards Blue Badge holders.

# Agenda Item 4.1

## Equality, Local Government and Communities Committee

21 March 2019 – papers to note cover sheet

Paper no.	Issue	From	Action point
ELGC(5)-10-19 Paper 9	Forward work Programme	Wales Audit Office	Letter from the Wales Audit Office in relation to the Consultation on three-year forward programme of work
ELGC(5)-10-19 Paper 10	Renting Homes (Wales) (Fees etc.) Bill	Minister for Housing and Local Government	Letter from the Minister for Housing and Local Government in relation to the Renting Homes (Fees etc.) (Wales) Bill

Dear Colleague

### Consultation on three-year forward programme of work

During December 2018 and January 2019, I [consulted](#) on proposals to inform the development of a three-year programme of audit work. I am very grateful to the many organisations and individuals who responded.

I made clear at the time that, with this being my first programme of work as Auditor General, I am keen to ensure that it covers the big issues facing Welsh public services, as well as enabling us to offer detailed commentary on governance, management and service delivery. The proposals that I consulted on were anchored in the following themes:

- Key risks and opportunities facing Welsh public services, such as austerity, demographic change, Brexit, digital and public service transformation;
- Governance and management of Welsh public bodies; and
- Delivery of key programmes, projects and services.

Around 180 organisations or individuals were invited to provide views and we received a total of 55 responses. Those responses were predominantly from the organisations that we audit but also from a variety of other sources including representative bodies, the third sector, Public Accounts Committee members and committee clerking teams from the National Assembly, unions and professional bodies.

The responses that we received helped us prioritise a number of the proposed studies and indicated support for/interest in a wide variety of the topics that we had included in our consultation. Unsurprisingly, the balance of responses reflected the direct relevance to the organisations responding to some extent. Nevertheless, it is clear that many of those responding welcomed the opportunity to provide comments on a cross-sector basis and looking more than one year ahead. Alongside the responses to the consultation, my thinking about how we take our work forward has

been informed by the very many conversations that I have been having over the past six months with Chief Executives and senior officers across our audited bodies and other partner organisations.

I emphasised as part of the consultation the importance of retaining flexibility within my programme to respond to any emerging or unanticipated issues. Nevertheless, mapping out a medium-term plan for my work will provide a clearer line of sight for the various stakeholders. I will be providing fuller details of my plans over a three-year horizon following some further engagement activity.

In the meantime, I have appended to this letter an overview of new work that I intend to take forward in 2019-20 as part of my programme of national studies. This includes thematic local audit work across specific sectors and work to follow up on previous studies. For completeness, I have also provided details about work in progress prior to the consultation that will run into 2019-20.

When deciding on the specific plans for individual pieces of work, we will consider comments raised through the consultation and engage with relevant external parties. Please do not hesitate to contact us if there are any further thoughts about the topics that we have prioritised for 2019-20 that you would wish us to take into account.

I made clear as part of the consultation that I am keen to produce shorter, sharper reports, make more use of data analytics, issue more real-time commentary on the big issues facing public services, and use different media to communicate our messages. This is all with the wider aim of exploiting our unique perspective, insight and knowledge base, building on our already positive reputation and being more visible in the way we engage with the bodies we audit and the people of Wales more generally. We are already taking the learning from positive recent examples to help develop our future approaches, including tailoring more of our work to reflect the perspectives of citizens and service-users.

Once again, I am very grateful for the time that has been spent considering and responding to our consultation and look forward to working with you as we take forward our audit programme.

Yours sincerely



**ADRIAN CROMPTON**  
**Auditor General for Wales**

## Annex: 2019-20 programme of national studies work

### Work already in progress prior to the recent consultation<sup>1</sup>

<b>Improving the well-being of young people</b>	We are drawing together data to provide an overview of relevant trends and will also be highlighting key lessons for the Welsh Government to learn based on our review of issues including young parents, young adult carers, homelessness, mental health, jobs and skills.
<b>Primary care services</b>	Following on from our <a href="#">Picture of Primary Care report</a> , we will be building on local audit work to consider whether health boards are well placed to implement the strategic vision for primary care.
<b>Integrated Care Fund</b>	This cross-sector review has considered whether the Integrated Care Fund is being used effectively to deliver sustainable services that achieve better outcomes for service-users.
<b>Orthopaedic services</b>	We are following up our <a href="#">2015 report</a> to examine the extent to which previous audit recommendations have been implemented at a national and local level. The focus of the work will be on elective services, although the impact of emergency/unplanned demand on these services will also be considered.
<b>Quality governance arrangements in NHS bodies</b>	As an extension of our <b>structured assessment</b> work at NHS bodies we are examining quality governance arrangements at NHS bodies, with a particular focus on the arrangements underpinning the work of quality and safety committees.

<sup>1</sup> This list includes work already in progress prior to the consultation that will run into 2019-20.



<b>Tackling violence against women, domestic abuse and sexual violence</b>	<p>In the context of the <a href="#">Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015</a> and the <a href="#">national strategy</a>, this work is considering whether local authorities are collaborating effectively with their partners to prevent violence against women and domestic abuse.</p>
<b>Planning services</b>	<p>In the context of the <a href="#">Planning (Wales) Act 2015</a>, this work is considering how well local planning authorities are delivering their planning services and whether services are supporting sustainable development and delivering for the long-term well-being of local communities.</p>
<b>First point of contact assessments</b>	<p>This work is considering whether local authority first point of contact assessment and processes are meeting the needs of service users and carers in line with the <a href="#">Social Services and Well-being (Wales) Act 2014</a>.</p>
<b>A465 (Section 2) road improvement</b>	<p>We are undertaking this work in the context of wider concerns about cost and time overruns. We are planning to publish an initial 'interim findings' report.</p>
<b>Well-being of future generations</b>	<p>We will be continuing work to discharge the Auditor General's duties under the <a href="#">Well-being of Future Generations (Wales) Act 2015</a> to examine and report on the extent to which relevant public bodies have acted in accordance with the 'sustainable development principle' when setting and taking steps to meet 'well-being objectives'.</p>

New work that we plan to take forward in 2019-20, building on the consultation<sup>2</sup>

<p><b>Picture of public services</b></p>	<p>We plan to adopt this as a theme for different pieces of commentary-based work over a three-year period.</p> <p>Reflecting proposals set out in our work programme consultation, in 2019-20 this could include plans for work on a <b>UK comparative spending analysis</b> and commentary on examples of <b>changing approaches to public services</b>. It could also include further commentary on <b>NHS finances</b>.</p>
<p><b>Brexit</b></p>	<p>Following our <a href="#">February 2019 report</a>, we will be taking forward further work to consider how public bodies are responding to the implications, risks and opportunities of Brexit.</p> <p>This is likely to then continue as a theme for further work in 2020-21 and 2021-22.</p>
<p><b>Preventing fraud and corruption</b></p>	<p>We are already taking work forward to provide an initial overview report to inform a planned Public Accounts Committee inquiry. We may then take forward further work to consider in more detail the effectiveness of public bodies' arrangements.</p>
<p><b>Administration of student finance</b></p>	<p>We plan to consider issues relating to the overall administration of the student finance system, including the implementation of the new arrangements introduced from September 2018 and the Welsh Government's modelling of future repayments. This work may also draw on the results from data-matching work as part of the National Fraud Initiative.</p>
<p><b>Fuel poverty / energy efficiency</b></p>	<p>This work will look at progress in tackling fuel poverty. The work will consist how fuel poverty/home energy efficiency programmes integrate with wider anti-poverty work.</p>

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<sup>2</sup> There may also be additional outputs throughout 2019-20 arising from other follow-up work on previous audit topics, from examinations undertaken in response to issues of public or parliamentary concern, or from local performance audit work where there are issues or learning of wider relevance.

<b>Welsh Government workforce</b>	This study would look at how the Welsh Government is planning its workforce in light of the changing environment in which it operates. We may extend the work to consider wider workforce management issues.
<b>Welsh Government ICT</b>	This work would look at the basis for the Welsh Government's decision to bring its core IT service in-house from early 2019, including expected costs and benefits and the extent to which the new arrangements are delivering in line with expectations.
<b>Digital resilience</b>	As described in our consultation, this would look at how public bodies are ensuring that their IT systems are resilient, robust and secure so that, in the event of serious incidents, systems can be recovered quickly and services can keep running. It could also incorporate some more general issues reflective of the proposal in our consultation on <b>ICT asset management</b> .
<b>Welsh Community Care Information System (WCCIS)</b>	We touched on plans for the WCCIS in our <a href="#">2018 report</a> on informatics systems in NHS Wales. This study will look at the effectiveness of the national and local implementation arrangements and would consider whether the investment to date has provided value for money. Our consultation identified this as a potential topic for the period 2020-21 or 2021-22, but we plan to bring this forward.
<b>Impact of austerity on local authority discretionary services</b>	This study will focus on judging how well local authorities understand, plan for and meet the needs of those people in need of discretionary services. The review will look at the scale of changes in discretionary provision across Welsh local authorities.
<b>Financial sustainability in local government</b>	We will be taking forward local audit work across all local authorities on this topic. This work will examine medium and longer term financial strategy, budget management, cost pressures, efficiency and savings plans, and levels and use of reserves. We anticipate reporting the findings from that work in some way at a national level.
<b>Commercialisation in local authorities</b>	This study will look at the work of councils to create a strong commercial outlook, how they are developing commercial skills, their policies, vision, monitoring and reporting abilities and broader delivery infrastructure.

<b>Public Service Boards</b>	As a refinement to the proposal in our consultation on regional working in local government, this work will focus on issues relating to the performance of Public Service Boards as vehicles for improving the well-being of citizens.
<b>Grants management</b>	Building on the proposal in our consultation, this work will reflect on how the Welsh Government has been <b>managing changes to grant schemes</b> but as part of a wider look at how grant management arrangements have developed since our <a href="#">2011 report</a> .
<b>Collaborative arrangements for managing local public health resources</b>	We will be examining whether NHS Wales has worked collectively to address the issues we identified through previous <a href="#">local audit work</a> at Public Health Wales NHS Trust.
<b>NHS waiting times</b>	We intend to follow up on our <a href="#">2015 report</a> and are likely to incorporate consideration of the topic from our consultation on <b>procedures of limited clinical value</b> . There are also links to our ongoing work on orthopaedic services.
<b>Covering teachers' absence</b>	We intend to follow up on developments since our <a href="#">2013 report, including in response to the Ministerial Supply Model Taskforce's 2017 report</a> .

John Griffiths AM  
Chair  
Equality, Local Government and Communities Committee  
National Assembly for Wales

[SeneddCommunities@assembly.wales](mailto:SeneddCommunities@assembly.wales)

13 March 2019

Dear John,

During Stage 2 scrutiny of the Renting Homes (Wales) (Fees etc.) Bill, the former Minister for Housing and Regeneration, Rebecca Evans, committed to give further consideration to include Green Deal payments as a permitted payment within the Bill and said she would write to the committee about the thinking being put into a communications plan.

In respect of Green Deal payments, paragraph 7 of Schedule 1 to the Bill, as amended at Stage 2 (permitted payments in respect of provision of utilities), could be considered to be broad enough to encompass Green Deal loan repayments. However, having reflected further I recognise this may be open to interpretation when the Bill is enacted.

Leanne Wood AM tabled an amendment at Stage 2 which, among other things, sought to include Green Deal loan repayments as a permitted payment. I have been able to work with her to bring forward an amendment at Stage 3 which is consistent with the approach taken in Schedule 1 of the Bill.

In relation to a communications plan for the Bill, I support David Melding's point, made in committee when he quoted the Chartered Institute of Housing's view that "...there must be a comprehensive and clear programme of supported communication activity to ensure the public are aware of what fees incorporate and therefore what enacting this legislation could mean for those renting in the future." I also support his point about the need for any campaign to cover all parties affected by the Bill – landlords, agents, tenants, prospective tenants and contract-holders under the Renting Homes (Wales) Act 2016.

To help ensure prospective tenants are aware of the changes, the campaign will have a broadly targeted awareness-raising element. This will include promotion of the benefits the legislation will have for those looking to rent in the private rented sector and also provide clarity about those payments, which are permitted. We plan to work with stakeholder organisations, including for example the National Union of Students and Shelter, to disseminate key information to people who already rent in the private rented sector.

Landlords and agents are also a key target audience for this campaign. It is of course essential that the implications and the date on which the legislation will take effect are well known to those who own, rent and manage properties.

Landlords and agents are already required to be registered or licensed with the licensing authority designated under section 3 of the Housing (Wales) Act 2014, Rent Smart Wales. We will make the most of the opportunity this brings by working closely with Rent Smart Wales by communicating the changes through stakeholders such as representative organisations and professional associations.

The campaign will begin in advance of the Bill coming into force. The success of the Bill, should it become an Act, is dependent on ensuring tenants can make informed choices and landlords and agents are aware of the law. In terms of those landlords and agents, it is also important to provide them with sufficient lead-in time to prepare for the changes.

I hope that this provides you with the further details you were seeking at this stage of the legislative process.

Yours sincerely,



**Julie James AC/AM**

Y Gweinidog Tai a Llywodraeth Leol  
Minister for Housing and Local Government