

HO 07

Diweddariad ar bolisiâu a champau sy'n cael eu cymryd i roi terfyn ar ddigartrefedd

Update on policies and actions to end homelessness

Ymateb gan: Cymdeithas Llywodraeth Leol Cymru (CLILC)

Response from: Welsh Local Government Association (WLGA)

John Griffiths, MS

Chair, Local Government and Housing Committee

Senedd Cymru

Cardiff Bay,

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11th March 2022

Dear Mr Griffiths,

Thank you for the invitation to share views on the current situation and to suggest specific issues on which the Committee could focus its forthcoming work on homelessness and rough sleeping. We have supplied views on each of the areas, as outlined in your letter: -

▪ *Your views on the effectiveness of the “everyone in” approach put in place by the Welsh Government since the start of the pandemic and challenges maintaining that approach over the coming months;*

Welsh Councils support the approach put in place by the Welsh Government since the start of the pandemic. There are currently more than 7,000 people in emergency temporary accommodation. However, the numbers of people presenting as homeless to Councils continue to be very high, and the challenges of providing and maintaining appropriate levels of suitable temporary accommodation, along with difficulties in securing long term homes for people to move into, means that the numbers of people in emergency accommodation continue to increase.

Councils are concerned that following the end of the hardship fund arrangements in March 2022, the funding announced by Welsh Government will not be sufficient to support the ongoing requirement for increased levels of emergency temporary accommodation. The flexibility of the Hardship Fund was very much supported, with claims submitted on money spent. It would be useful to monitor spend against grant provided during the year to ensure sufficient funding has been provided to deal with the level of demand.

▪ *Your views on the reasons for the apparent increase in the number of people sleeping rough and what can be done to reverse it;*

Early engagement and intervention is required as people start to sleep rough so that patterns do not build and become embedded, so there needs to be effective fast response teams and multi-agency approaches to tackle issues and support people is required. Councils and partners continue to need to meet the needs of a substantial population of people having to spend extended periods of time in emergency temporary accommodation.

- *Your response to the Welsh Government’s Ending Homelessness in Wales: a high level action plan 2021-2026, including the timescales outlined in the plan and specific Actions within the plan that should be a priority for the Committee;*

The WLGA’s full response to the consultation on the Welsh Government’s proposals is attached. However, we would particularly draw your attention to Councils’ concerns that the action plan should reflect “the current position of the various organisations and partners in relation to the availability of resources and capacity to deliver existing and reformed services, and to undertake the significant strategic changes set out within the plan. This is an important consideration in both the scope of change and the timescales over which it is likely that effective and sustainable improvements can be made.”

In addition it was emphasised that the action plan should “adequately reflect the challenges of the current position in respect of the numbers of people being accommodated in emergency temporary accommodation, the complex needs of some of those being accommodated, and the current levels of households approaching Councils for assistance with homelessness.”

- *Your views on the allocations in the draft budget 2022-23 that support ending homelessness, as well as those increasing the supply, availability and accessibility of housing in the social and private sector;*

As noted above, Councils are concerned that following the end of the hardship fund arrangements in March 2022, the funding announced by Welsh Government will not support the ongoing requirement for increased levels of emergency temporary accommodation.

The Welsh Government budget contains a significant increase in the funding to support the development new social rented homes by Councils and RSLs, with £1Bn in total across the next 3 years covered by the budget, and this increase is welcomed.

Councils with housing stock are playing an increasingly important role directly developing a growing number of these much-needed new homes, and all Councils continue to work with their Registered Social Landlord (RSL) partners to ensure that new homes meet strategic housing needs. However, even with increased funding support, there are numerous challenges to developing enough new homes including the availability of land, rising costs of materials, constraints on the supply of materials, shortages in necessary key skills, capacity within some Council functions, capacity within utility companies, etc.

- *Your views on priority areas for the Green Paper on legislative reform, which is expected to be published by the Welsh Government in 2022, and areas the Committee should focus its scrutiny on;*

The WLGA had previously suggested areas for scrutiny by the Committee in the letter dated 21st September 2021 from Cllr Andrew Morgan (copy attached)

The information available on the likely Green Paper suggests that it will include consideration of Priority Need, Intentionality, Allocations, Evictions, Local Connection, Suitability, Duties on public bodies and a Rights based approach. Each of these areas will need detailed consideration and scrutiny when the detail is available, particularly for likely impacts and potential unintended consequences and important to learn from elsewhere when they have tried or made such policy changes. It will be important that a full impact assessment of the draft legislation is undertaken, co-

produced with the sector so better laws are made and adequately prepared for in terms of implementation and impact

Given the likely broad scope of the Green Paper, and the over-riding importance of preventing homelessness wherever possible, we would suggest that it would be particularly useful for the Committee to scrutinise the current and potential future contribution of wider public services, other than local authorities, to the active prevention of homelessness.

▪ *Your response to the recommendations made by the Public Services Ombudsman for Wales in his report, Homelessness Reviewed: an open door to positive change.*

We welcome the recommendations made by the Ombudsman in his report. Local authority Homelessness teams have been, and continue to be, at the forefront of efforts to ensure that people who become homeless are protected during the pandemic. Councils' contribution and commitment to support the most vulnerable during the pandemic has been significant and the incredible efforts of thousands of council workers during the most challenging of periods were recognised by the Ombudsman. The report identifies both areas for improvement and examples of good practice. Local authorities are committed to improving outcomes and will want to use the report's findings to reflect and use the findings to ensure effective, responsive and resilient services.

Jim McKirdle

Housing Policy Officer, WLGA

WLGA Response - Ending Homelessness: High level action plan consultation

The Welsh Local Government Association (WLGA) represents the 22 principal Councils in Wales. The three national park authorities and the three fire and rescue authorities are associate members.

The WLGA is a politically-led cross-party organisation, with the leaders from all principal Councils determining policy through the Executive Board and the wider WLGA Council. The WLGA appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.

The WLGA welcomes the opportunity to respond to the Welsh Government's consultation on Ending Homelessness: High level action plan 2021-2026. Our response utilises the questions posed in the consultation.

Consultation questions

Question 1

The Action Plan is split into four key areas of focus (Partnerships, Rare, Brief and Non-recurring). Do you agree that these are the right areas of focus / themes to focus the plan around?

Please explain why you consider the areas of focus / themes are right or if you think a different approach is needed?

- The four key areas of Partnerships, Rare, Brief and Non-recurring provide a useful and reasonably well understood framework for understanding and communication. However, "prevention" of homelessness needs greater emphasis and should be explicitly identified as one of the key areas of focus, rather than being implicit across a range of actions within the plan.
- There is a real challenge in moving away from this plan and the actions within it being seen as being primarily the responsibility of homelessness and housing options teams. It is not clear, so far, how this action plan will be framed and presented in such a way that will make it sufficiently important and meaningful for corporate and partnership groups.
- There should be a greater emphasis within the action plan on poverty as both a driver and as a consequence of homelessness. Affordability is now even more of an issue in the private rented sector than has historically been the case. This is exacerbated by the increasing gap between rent levels, incomes and the support provided by subsidies such as Local Housing Allowance.

Question 2

Do the actions in the Action Plan reflect the most effective high level steps that will enable the Welsh Government and its partners to end homelessness in Wales?

How can they be improved?

- Broadly, the actions in the Action Plan reflect the high level steps that will enable the ending of homelessness in Wales, but there are varying levels of confidence that each of the actions can be effectively and sustainably delivered.
- Timescales need to reflect the availability of all kinds of resources within all the organisations and partnerships that are required to continue to deliver services and to support and lead the development of change.
- The focus on Partnerships needs to go further and be more explicit about who the partners are and expectations upon them. Levers to promote further co-operation could usefully be identified, as well as identifying tangible beneficial outcomes for partners such as health, criminal justice, etc.
- While the development and implementation of rapid rehousing approaches is rightly identified as a key action, there is no reflection that this solution will not be suitable for all people, and that there will be a continued need for the provision of supported housing solutions, etc., to ensure that the needs of all are provided for in a balanced and sustainable way.
- There is no indication within the action plan of the development of any solutions for dealing with very challenging behaviour and non-compliance or non-engagement with services which has been a feature of a minority of people being supported.

Question 3

Does the Action Plan align with other relevant areas of policy and practice?

Please explain why it aligns well or outline how it could be made better?

- The action plan seems to be comfortably aligned with the framework and ways of working set out in the Wellbeing of Future Generations Act and the Social Services and Wellbeing Act.
- The action plan should be actively supported by the policy work and processes related to increasing the supply of social housing, for example, by using subsidy models which support the development and management of the types of homes which will meet the needs of those most likely to be affected by homelessness. This will include increased numbers of homes which are suitable and affordable for single people.

- The action plan would benefit from being more aligned with other policy and practice related to preventing and alleviating poverty. This would better reflect the role of poverty as both a driver and consequence of homelessness for many people.

Question 4

We have developed a number of key actions and milestones. Do you feel these are the right ones?

- The key actions and milestones are broadly the right ones, however, there is varied confidence that the challenges to effective and sustainable delivery can be overcome given the current level of capacity and resources available.
- The message that the prevention of homelessness, whenever possible, remains the first priority for all organisations and partnerships could be greatly assisted by re-ordering the plan to give much greater emphasis to action 11 (on prevention), perhaps placing this at the start of the action plan.
- The first four actions link directly to two of the actions identified in the Programme for Government p i.e. fundamental reform of homelessness, and the delivery of 20,000 additional low carbon homes for social rent. The implications for local authorities of implementing these first four actions are so significant, that there is a possibility that the remaining actions which follow are almost seen as being less significant. The plan needs to emphasise that all the actions have very significant contributions to make toward the overall goal of ending homelessness.

Question 5

Do you think there are any key areas for action not captured by the high level actions? If so, what would they be?

- There is no reflection within the action plan of the current position of the various organisations and partners in relation to the availability of resources and capacity to deliver existing and reformed services, and to undertake the significant strategic changes set out within the plan. This is an important consideration in both the scope of change and the timescales over which it is likely that effective and sustainable improvements can be made.
- The action plan doesn't adequately reflect the challenges of the current position in respect of the numbers of people being accommodated in emergency temporary accommodation, the complex needs of some of those being accommodated, and the current levels of households approaching Councils for assistance with homelessness.

- The action plan should also better reflect the dynamic and challenging circumstances in relation to securing a supply of accommodation to allow people to move out of emergency temporary accommodation to more permanent housing. These options are being severely curtailed in many areas by the availability and affordability of accommodation in the private rented sector. Some of the recent drivers for this related to changes in local housing markets which have meant that increasing numbers of landlords are leaving the market, and the increasing gap between rental costs and Local Housing Allowance rates in almost all areas of Wales.

Question 6

We would like to know your views on the effects that the Ending Homelessness Action Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

- The Action Plan does not have any significant effects on Welsh language use, nor does it pose a risk of treating the Welsh language less favourably than English.
- To increase any positive effects and mitigate any potential negative effects it is critical that any resources or guidance materials issued to councils and stakeholders are fully bilingual. In implementing the plan and delivering the services it is also important to promote the availability of key services in both languages. It is important that language preferences are established from the outset and that providers do not assume a person would prefer to receive a service in English, this is particularly important when delivering interventions, e.g., accessing counselling in a person's first language or preferred language can help build stronger relationships and lead to better outcomes in some cases.

Question 7

Please also explain how you believe the proposed plan could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

- The high-level Action Plan would not need changing however as mentioned above any subsequent guidance and training materials would need to be bilingual and stakeholders responsible for delivering services should establish user language preferences and promote the offer of services in both languages.

Question 8

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them

- The action plan could usefully address how we avoid rapid rehousing development becoming a driver for it to be seen as the main route into social housing and, as a consequence, running the risk of driving unintended behaviours.
- Some of the actions are very strategic, while some of the others are fairly operational. A better balance/grouping of actions would ensure that the action plan is viewed as a whole, and that all of the constituent elements are seen as having equal importance.
- The plan should recognise the need to ensure that sufficient front line and strategic capacity is in place to support the delivery of effective and resilient services and to support the significant strategic change which lies at the heart of action plan and its ambitions.
- It is important that all relevant Welsh Government programmes and functions support the delivery of the right number and the right kind of homes e.g. the Social Housing Grant guidance and Standard Viability Model must actively support and incentivise support the delivery of single persons accommodation. All the relevant policy levers need to be aligned in support of the objectives within the action plan.
- There is no mention within the action plan of support for those with No Recourse to Public Funds. This is a concerning omission, given the potential impacts on those currently being supported during the pandemic.

Jim McKirdle
Housing Policy Officer
Welsh local Government Association

12th November 2021

Your Ref/Eich Cyf:

Date/Dyddiad:

Email/Ebost:

16th September 2021

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



Dear John,

Priorities for the Local Government and Housing Committee

Thank you for your letter seeking views on the priorities for the Local Government and Housing Committee.

We are pleased that the Senedd has once again agreed to establish a committee focused on local government given the critical importance of local authorities in delivering vital front-line services and leading their communities. We therefore look forward to working with you and your committee in promoting the work of local government and seeking to shape policy and legislation.

The WLGA set out its ambitions for the coming term in its [Manifesto for Localism](#) ahead of the Senedd elections. As you will be aware, we have also been invited to contribute to other Senedd Committees who have sought views on their forward work programme priorities.

Local authorities continue deal with Covid pressures and find themselves balancing the demands of the continuing response to the crisis with the process of recovery, restoring services and reopening the economy. Most local government services are stretched as never before with unprecedented demand for social services, the return of schools for the Autumn term and the continuing pressure on public protection and enforcement services rarely far from the news headlines.

There are several key local service matters which will therefore inevitably feature strongly in other committees' work programmes given ongoing or planned reforms and the significant impact of COVID, notably within the economy, education and social services.

Although these matters are not within the remit of this committee, housing will no doubt feature prominently in the work of your committee as a critical local service, key contributor to local economies and crucial to our post-pandemic recovery. Cllr Andrea

Dr Chris Llewelyn
Prif Weithredwr
Chief Executive

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**Croesawn ohebiaeth yn y Gymraeg a'r Saesneg a byddwn yn ymateb i ohebiaeth yn yr un iaith.
Ni fydd defnyddio'r naill iaith na'r llall yn arwain at oedi.**

**We welcome correspondence in Welsh and English and will respond to correspondence in the same language.
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Lewis, WLGA Spokesperson for Housing has therefore contributed to this response.

We therefore suggest the committee may wish to consider the following within its forward work programme:

- The Programme for Government has an objective **to strengthen the autonomy and effectiveness of local government to make them more successful in delivering services**. This can only be done with **fair and flexible funding** – councils need greater fiscal autonomy and flexibility to respond to local needs and priorities, including powers to explore other sources of income from fees and charges and discretionary powers to raise new taxes to tackle specific local issues (such as a tourism tax). The Welsh Government’s commitment to **reducing the administrative burden on local authorities** is welcome and the WLGA would make the case that all specific grants should be incorporated into general grant. The Welsh Government’s commitment **to reform council tax to ensure a fairer system for all** has also been welcomed and the Committee may wish to contribute to any emerging proposals as they develop in the coming months.
- The **effectiveness of Welsh Government in supporting the work of local authorities and other partners in tackling and preventing homelessness and rough sleeping** and ensuring that those brought into temporary accommodation (currently more than 6,500) during the pandemic are supported into permanent housing, and supporting the transformation of current and future temporary accommodation provision and homelessness services.
- Following the Affordable Housing Supply Review, **examine the effectiveness of Welsh Government support for increasing the delivery of affordable homes, including the building of greater numbers of homes by Councils and Registered Social Landlords across Wales**; A cross Government approach to new-build, improvement and retro-fit housing projects gives the opportunity to provide simultaneous action on: meeting housing need and tackling homelessness; energy efficiency, fuel poverty and climate change; inclusive local economic growth; and improving health, well-being and general social cohesion.
- Recent reviews of housing adaptations in Wales published by Wales Audit Office (2018) and the Senedd’s Public Accounts Committee (2018) highlighted the need for Welsh Government, local authorities, housing associations, Care & Repair Agencies, and health and social care bodies to bring greater consistency and standardisation of services. The Committee could usefully **examine the degree to which the recommendations from these previous studies have been implemented and improvements in the strategic and operational delivery of adaptations** has been achieved to support the health and wellbeing of vulnerable people
- The [WLGA’s Rural Manifesto](#) asks for “Housing to reflect local community needs” to be achieved through tailored housing policies to support the needs of rural communities to stimulate local economies and retain a younger demographic, with capital subsidies to build affordable homes across a range of tenures. The Committee **could examine the effectiveness of housing policies and subsidies in achieving these objectives**.

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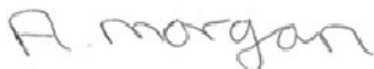
- Dame Judith Hackitt made many recommendations to deliver improvements in building safety following her inquiry. The **Committee may wish to consider the progress made to-date in implementing these recommendations in Wales**, any barriers to implementation, and identifying changes required to continue progress in this important area.

Your request was for a focus on the coming 12 months, however in the longer-term, the committee may wish to consider:

- **Post-legislative scrutiny of the Local Government and Elections (Wales) Act 2021**, in particular a focus on the wider electoral and democratic services reforms and establishment of corporate joint committees (although corporate joint committee functions are not commenced until June 2022 (for three of the CJs), so any review should be timed to ensure that these functions have been embedded.
- **Electoral reform** – the Welsh Government has set out an ambitious programme of electoral reform, both ahead of the 2022 local elections and a second phase, ahead of the 2026 and 2027 elections in Wales. There will be much learning from the administration of the 2022 local elections, including new reforms and some electoral pilots, which should feed into the Welsh Government’s longer-term reform agenda. Although this might be a matter the Justice and Constitution Committee may plan to consider, the Local Government and Housing Committee will clearly have an interest given the impact on local democracy and local electoral administration.

WLGA leaders are particularly keen to engage with the work of the Committee and across the Senedd and we held a successful introductory meeting with Members of the Senedd, including some members of the Committee, on Wednesday. I would therefore welcome an opportunity to meet with you as Chair to discuss any matters of interest further.

Yours sincerely



Cllr Andrew Morgan
WLGA Leader

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