

1. The impact of wider policy development

At the moment, key areas of policy development relate to:

- A Department of Work & Pensions (DWP) public consultation on rents and eligibility for Housing Benefit (HB) service charges
- Welsh Government (WG) proposals to implement the Full Flexibilities Grant, merging the Supporting People Programme Grant (SPPG) with a range of other grants

We have seen clarity when it comes to the overall programme objectives: the focus on prevention of homelessness, for instance, as well as offering support to individuals to maintain their accommodation in the community. Without this support, it is likely that a wide range of client groups with varied support needs would need an institutional setting, as opposed to a community-based tenancy.

In recent years, the Welsh Government's strategic aims for the Supporting People programme has been characterised by a series of letters from Ministers – these letters highlighted priority areas, emerging at various times at which the programme's aims might need to shift: examples include meeting the aims of the Housing (Wales) Act and the Health, Social Care and Wellbeing (Wales) Act; tackling poverty; investigating Adverse Childhood Experiences (ACEs); domestic abuse; and substance misuse in Wales.

It would be beneficial if the Welsh Government were to consolidate a coherent view on the purpose making the grant available and publish this, taking into account recent policy and implementation developments.

Recognition also needs to be given to the contribution that long term support services make to the wellbeing of people with mental health issues. In line with the Social Services and Wellbeing (Wales) Act, these services promote independent voices, and independence for individuals when it comes to control over the support they receive. They also contribute to prevention and early intervention, key priorities of the Act; it is vital that sight is not lost of this.

Similarly, it is vital that current non-statutory key priorities for Local Authorities do not fall by the way-side because Local Authorities can only afford statutory services.

A letter to the Chief Executives of Local Authorities in Wales stated:

“The Full Flexibility pathfinder will give 100% flexibility across grants in order to achieve increased programme alignment, make more effective use of funding and meet local needs. This greater financial freedom and flexibility is expected to enable pilot areas to work differently, giving more scope to design services to support the Governments drive for more preventative, long-term approaches.”

There is, however, limited understanding when it comes to some of the less well-known grants in the list contained as an appendix – in particular, it is unclear as to what some of these grants deliver on.

Currently, the majority of Supporting People funded services focus on preventative work. There could be a lack of regional preventative service delivery if Supporting People were subsumed into a ‘super grant’. We would argue that this grant should remain focused on prevention and early intervention, and are genuinely concerned that the Supporting People programme would be ‘diluted’ if it were merged with other grants programmes.

The issue of timing also raises questions. At present, there is a clear local governance process in place: this process includes a Local Plan, a Commissioning Plan, a Housing Plan, and a Regional Strategic Plan. Administering the proposed grant would require clear, strengthened governance processes to replace or amend existing ones. The time it would take for the Welsh Government to devise and issue guidance for the implementation for amalgamating up to ten grants needs consideration.

Furthermore, the Full Flexibility Pathfinder pilot will run from April 2018 to March 2019. The proposed super grant is to be implemented from March 2019 to April 2020. Considerable effort will be needed to put in place procurement and contract regulations in time for the super grant’s rollout in 2019.

There also appears to be little or no time to undertake a monitoring and evaluation exercise within the pilot areas prior to the super grant rollout. This leads to a danger that any failures of the pilot will be ‘inherited’ during the transition to the

super grant, as the time for monitoring and evaluation of the pilot is extremely limited.

There are also implications when it comes to the UK Government's Supported Accommodation review.

The current consultation proposal, as we understand it, is for a devolved pot for a short-term, temporary supported accommodation grant. Longer term, sheltered, and extra care are to remain in the welfare system, with increased regulation and monitoring of rents and service charges.

There are concerns about how the pot for short-term accommodation will be sized, and how its definition by the DWP will be used for up to two years – it is unclear as to whether dispersed temporary accommodation will be included in this definition. It is also unclear whether this pot will sustain existing provision, or whether it will be reduced before being devolved. We would also appreciate clarity as to how this supported accommodation grant would be developed by Welsh Government.

Development of the Welsh Government policy on the administration of the short term supported housing grant needs to be coordinated with the development of the Full Flexibility grant fund. Presently, the revenue for these services predominantly comes from the Supporting People grant. We need a strategic link to the levels of public capital subsidy, which impacts on rent and the service charges that service providers set.

Currently, little is known about the intentions of Welsh Government, but signs from England suggest the possibility of block funding provision to Registered Social Landlords to cover rent and service charge costs, with limited and affordable charges to tenants. If this were the case, then individuals would benefit from the more affordable charges, and be more able to focus on getting work ready while living in supported accommodation. There could also be positive impacts on arrears of service charges, and consequently on eviction rates.

Local Authorities in Wales would welcome following England's option to allocate funding to LAs to administer. This makes sense, and fits with the local role of LAs, as well as their statutory duties under homelessness legislation. Local Authorities also act as commissioners for supported housing, and prioritise locally allocated

public capital subsidy, including the Social Housing Grant (SHG) for Registered Social Landlords.

Regional Collaborative Committee provider members and Wallich staff have concerns that funding is maintained for this group of individuals, many of whom may be non-statutory groups at present. Their view is that some form of ring fencing or scrutiny is required to assure this resource is in place for the temporary supported housing grant, and Supporting People funding.

The DWP consultation document suggests that, in England, a framework for needs assessment processes and strategic plans will be introduced. In Wales, however, these are already in place, and there has been no regulation of RSL rent or service charges in supported housing at Welsh Government level.

Currently, these rental and service charge costs for temporary supported housing are predominantly scrutinised by Housing Benefits sections. If the short-term accommodation funding is devolved from the Welsh Government to Local Authorities, there may be a lack of capacity to undertake this work as Housing Benefit sections decline in capacity while welfare reform is rolled out centrally. Welsh Government needs to ensure that the skills, knowledge and understanding around rent and service charge costs are supported, and should consider making new burdens allowance for this work.

Support classified as 'sheltered' or 'extra care' comes with its own set of issues. Under these proposals, there is concern in relation to the impact that Sir Mansel Aylward's recommendation might have on services which have moved to be fully compliant – that is, they may not have a support package tied to the service any longer that still meets the definition of sheltered accommodation. The Welfare Benefit System might regard them instead as general needs.

Similarly, some newly built Old Age Pensioner (OAP) designated accommodation might have been developed with similar physical facilities, which necessitate higher rents and service charges, but might not meet the definition of sheltered accommodation because of the lack of commissioned support.

Likewise, longer-term support housing needs to be considered carefully. The consultation suggests there will be regulation of long term supported housing rents and service charges by central government, but there is no detail yet. Clarity

as to whether this regulation will be devolved to the Registered Social Landlord regulator in Wales is required.

Welsh Government should also consider how it might improve communication about the priorities for the Supporting People programme, and the impact of wider developments. We would find it beneficial for the view to be consolidated at government level as to the purpose of making the grant available, and to communicate this clearly and effectively. Currently, the guidance around Supporting People is heavily focused on administrative grant conditions, and bureaucratic details around governance and process, rather than purpose and priority.

We would also support the development of an up-to-date strategic document on the intention of the national programme aims, and ensure Welsh Government is resourced to regularly engage in the Supporting People Information Networks (SPIN) and Regional Collaborative Committees with relevant guidance.

Questions need to be answered as to how best to align the work of the RCCs with other collaborative governance arrangements; this alignment needs to be clarified at Welsh Government level in the first instance. The link between Social Services and Wellbeing Partnership Boards should be strengthened, as well as the links between those bodies and housing and homelessness teams.

The local programme delivery is driven by local homelessness strategy priorities but it seems there is no equivalent regional direction for this work. For example, Welsh Government have requested for homelessness strategies to be carried out by Local Authorities. The regional networks that have existed for Housing Strategy including homelessness have been on different footprints to Western Bay.

Supporting People funding is only one of a number of tools (although it is significant in its level of resource) used to tackle and prevent homelessness. It funds a considerable amount of accommodation and support, and yet it is administered within a highly prescribed and bureaucratic structure compared to other grants and tools.

Regional working over the past five years has had mixed effectiveness, with positive and negative aspects that could inform ways of working moving forward. Harmonising processes, for example, reduces workloads for providers. There has also been the sharing of resources, quality and performance information,

innovative ideas and good practice across Wales. Relationships have improved as a result.

However, regional working in Wales has also amplified some unnecessary bureaucracy – inherent, for example, in managing a local housing strategy instead of a regional one.

Any new governance and management arrangements for Supporting People funding should reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015, as the current system largely does. These five ways are: long term; prevention; integration; collaboration, and involvement. For the most part, the Supporting People programme performs well in these areas – particularly involvement, collaboration and prevention (there is a strong preventative focus in particular). The annual funding settlement, however, can hinder long term planning. Supporting People has also not fully delivered on integration.

A practical example of this is Swansea's pilot directorate commissioning project for people with learning disabilities. The project aims to work with individuals and provide support across many aspects of their lives, from education to independent living, with focuses on preventing homelessness, accessing work, and aging. This has been devised in response to the Wellbeing of Future Generations (Wales) Act.

2. Monitoring and evaluation

We need clarity about how monitoring and outcome data will be used to inform decision-making about programme expenditure and contract monitoring, as well as the revised outcomes framework the Welsh Government is proposing, and the extent to which it will address the limitations of the current framework.

The development of the Health, Social Care and Wellbeing Outcomes has brought with it an opportunity to devise a single set of national outcomes that are used in a consistent way; this would reduce bureaucracy and administrative processes at a time of extreme pressure for Local Authorities and service providers. Welsh Government might want to consider a single set of outcomes across Welsh Government Directorates, creating consistency and maximising efficiency.

There is an inconsistency between social care outcomes for individuals and the outcomes of the Supporting People programme: the former are not collected

nationally, yet the latter, it has been decided, must be. Perhaps some reflection is needed to make sure this is the best course of action.

Any revised outcomes and framework arrangements need to be communicated and embedded in service specifications effectively – this can be done via guidance and training, using a common language.

There are other opportunities to strengthen monitoring and evaluation. Assessing the relative value for money of comparable services would be a worthwhile endeavour, for example. The development of in-depth, long-term studies on the effectiveness of policy and programme changes could also provide real insight into the effectiveness of services funded by Supporting People funding – one example of this is the Secure Anonymised Information Linkage (SAIL) project carried out by Swansea University, which highlighted the positive impact of the Supporting People programme on health service usage. Similar studies could demonstrate the impact of funding on homelessness and social care.

There is also a strong case for a nationally procured consistent database for returning performance data. A benchmarking group could be established, in recognition of the fact that there are rarely, if ever, identical models of service or service specifications.

3. Distribution of programme funding and financial planning

There are a range of issues that need to be considered in developing and implementing any new funding formula. The development of any formula for the distribution of grants should be free of any potentially damaging incentives related to performance measures applied by Welsh Government. There should be a focus on vulnerability, and a recognition of the levels and complexity of overlapping vulnerability.

It should be recognised that the legacy capture under Transitional Housing Benefit (THB) in 2003 was based on need, as THB captured those needing and having support at the time. Some Local Authorities were effective at capturing this – however, citizens in Local Authorities performing less effectively should not be penalised as a result of their LA performance at that time.

Regional Collaborative Committees have received very limited information about Full Flexibilities proposals to date, and as such, it is very difficult to comment on them. Similarly, the current financial worth of each of the proposed grants to be

merged is unknown: it is impossible to establish the impact on SP funded services. A merger of grants at a reduced level could result in market uncertainty and instability. Currently, there is a lack of information available that would enable us to assess the impact on procurement requirements.

It has been suggested that the new budget line indicating the merging of grants is greatly reduced, compared to what it would be if the grants were merged today. We are, therefore, concerned about where the cost of this short-fall will be met, and the implication for service delivery if the funds cannot be found: there may well be a negative impact on service delivery, which has already been affected by budget pressures and funding uncertainty.

The supported housing review has restricted the development of accommodation-based service models, because of the uncertainties surrounding rental income for social landlords. Concerns have been raised by RSLs and third sector providers regarding annual Supporting People revenue settlements: potential cuts have not been communicated clearly, Welsh Government has provided late notifications confirming funding, with commitment only to annual funding and contracts from Local Authorities. This has led to human resource difficulties, with some providers serving redundancy notices to members of staff annually, until funding has been confirmed. Clearly, this can result in staffing retention issues.

There is potential reluctance to commission purpose-built specialist accommodation due to the uncertainty of revenue, and the concerns that landlords have of being left with buildings unsuitable for general needs letting, or which are costly to convert to such letting. Welfare reform proposals might have increased caution around commissioning fixed support provision, due to the effects on rent and service charges. Delivering fixed accommodation-based services, locating affordable and appropriate sites for development, and achieving planning permission for supported living, are all complex aspects of service delivery.

We need to consider the extent to which local and regional planning processes reflect well-evidenced needs, rather than historical patterns.

Some providers are completely withdrawing from providing Support People-funded services, due to the risk to business models. A move to three-year indicative allocation would allow planning and commissioning to factor into service development, and enabling longer contracts to be awarded.

There are several reasons for the identified wide variation in financial support for different client groups across Local Authorities. For example, legacy commitments might exist. Longer term supported living might still have people living in the same homes as they did in 2003. The analysis of the spend plan used does not entirely reflect the intensity of the services used – as a result, like is not being compared with like. Some groups may have a higher intensity, and tend to cost more. The needs of the local population might be different, and to meet those needs, locally determined priorities might be different. These priorities are determined based on a wide range of factors, and may be dependent on what other resources the area has for each category of need.

Likewise, procurement plans within each area and category could be at different stages of implementation. The implementation stage of Aylward's recommendations will have an impact, with a potential move towards generic, multi-specialist or pan-disability type services. Local property prices, salary costs based on local workforce issues, and rural issues such as travel and translation costs can all impact local services.

A similarly varied set of reasons exists for the noticeable change in the overall proportion of programme funds spent on floating and fixed support. The implementation of Aylward's recommendations has seen support classified in spend plans as fixed and sheltered change to OAP or generic floating support. The Social Services and Wellbeing (Wales) Act means there is more focus on prevention and early intervention floating support may be seen as a more complementary model.

Floating support as a model can be more efficient, flexible and effective for some groups, and commissioning decisions may have been made because of this. Fixed support, like supported accommodation, has its own advantages in certain contexts. Models of support that promote the voice of an individual, and a level of choice and control for service users, are of paramount importance.

Legacy patterns are still evident, but as procurement plans are being implemented, these patterns are likely to change. The complexity of change can vary by the service model and client group. The current regional Supporting People plan was developed through a joint review of housing and homelessness data at a regional level; this data was analysed as a whole, so a set of shared high level strategic priorities could be reached. However, all regional need mapping processes are heavily informed by local arrangements. This includes a range of data sources:

census and other population data; homelessness data (including evictions and other reasons for homelessness); analysis from Gateways as to demand for existing services and gaps in services, and client engagement.

Evidencing need could be further developed and refined: the Western Bay Regional Wellbeing assessment has made progress in this, but also recognised the need for improvements. Once need is evidenced for a particular group of individuals, and decisions are made, then the commissioning of housing related support for some client groups could be part of a larger continuum of provision, and part of a wider strategic process – for example, step-up and step-down provision could be part of an accommodation and support pathway.

The development of the new homelessness strategies was a missed opportunity for Welsh Government to formalise and develop this approach further, in a manner that would work consistently across Wales.

4. Conclusion

This document has gathered the concerns and views of members of staff at The Wallich. We appreciate the complexity of the Supporting People programme, and the large number of moving parts that it consists of. We also recognise the difficult financial context of the time, and the specific issues that come from housing being a devolved issue while changes to the benefit system are driven by the UK Government.

That said, Supporting People is vital for a huge number of vulnerable people across Wales; it can also be used cost-effectively, and to save money for other important public services. Changes to it should be carefully considered, and all implications thought through. We hope this contribution highlights some of these implications, and some of the concerns and opportunities that the proposed changes to Supporting People gives rise to.