

## 1. The impact of wider policy developments on the programme:

### 1.1 The overall clarity of the Programme's objectives:

1.1.1. These are not as clear as they could be, although recent WG information and guidance does stress the major contribution the Programme makes to the homelessness prevention agenda and legislation. SP is one of the most cross-cutting programmes ever introduced by central government and carried on by the Welsh Government. It is primarily a housing/homelessness programme, included in the Housing (Wales) Act 2014, which seeks to enable vulnerable people to access and maintain accommodation based on their housing-related support needs.

1.1.2. But the programme is expected to make a contribution to wider policy developments through: other pieces of legislation e.g. welfare reform, SS&W (Wales) Act 2014, VAWDASV (Wales) Act 2015, WoFG (Wales) Act 2015, Equality Act 2010 etc.; strategies e.g. substance misuse, re-offending, mental health, dual diagnosis etc.; agendas e.g. ACEs, tackling poverty, early intervention and prevention etc.. As such it has lost its identity/real purpose and this needs to be re-defined and promoted.

### 1.2. The implications of, and emerging responses to, the UK Government's Supported Accommodation Review:

1.2.1. The changes announced by UK Government to keep funding within the welfare system for retirement housing for the elderly and long-term housing has been welcomed by the supported housing sector across the UK. However, funding for short-term, traditional supported housing will be devolved to WG as a lump sum to be included in the settlement from 2020/21, a year later than originally planned.

1.2.2. Options include transferring the funding and implementation to local government which have the governance structure, systems, processes, capability and audit already in place to administer the 'grant'. It would make sense to amalgamate SPPG with this funding for accommodation-based schemes, provided

adequate funding was made available each year and, if required, 'new burdens' funding for the administration costs.

1.2.3. The funding could be put back into Council Housing Benefit departments which will now continue to provide this service for sheltered and longer-term accommodation. However, to achieve better value for money it would be better placed in the Supporting People arena and managed by the Supporting People Teams to assess real total premises/scheme costs. This would also enable a more strategic overview of services as is being envisaged in England (re-inventing Supporting People) e.g. audit total scheme costs, cross-subsidy issues etc.

1.3. How the Welsh Government might improve communication about priorities for the Programme and the impact of wider developments;

1.3.1. Improved communication can be achieved by: having clear, unambiguous priorities for the Programme; guidance and Terms & Conditions of Grant which reflect these priorities and what are not priorities/eligible; easy to read and navigate WG, LA and partner websites; WG inter-directorate meetings/briefings; better links with Health at a senior level; WG attendance at relevant meetings, conferences, forums etc.; capacity of SP Teams to be able to also attend meetings etc.; publicity campaign; WG SP Bulletins are good, if over-long, showing the complexity of the programme and a greater use of social media.

1.3.2. The Welsh Government needs to be more open and transparent concerning major changes to the Programme and consult widely before implementing what could be significant adverse changes. This is evinced by the recent 'Supergrant' or Funding Flexibilities debate which seems to have been conducted behind closed doors between senior officials of the WG and WLGA without the cognisance of the four local Programme managers/fund managers. This, combined with the apparent disappearance/volte-face of SPPG as a budget line from the 2019/20 Welsh Government budget has led to widespread fears and concerns across the sector, especially in relation to schemes that rely on capital expenditure as well.

1.4. How best to align the work of the Regional Collaborative Committee (RCC) with other collaborative arrangements;

1.4.1. A number of issues are mitigating against this happening especially 'funding flexibilities' as this will be prioritised across/within each LA rather than regional issues. Internal mechanisms for governance/oversight of this exercise will need to

be sorted out e.g. would the 'super grant' be approved/audited by the local Public Service Boards, regional PSBs, RCC or Regional Partnership Boards? What role would local SP planning groups and Cabinet Members have in this new proposal? What if there is conflict between RCC/Regional priorities and local priorities?

1.4.2. In Gwent there are two Funding Flexibilities 'pathfinder' local authorities out of the five authorities in the region which will mean that most energies will be spent during 2018/19 discussing, debating and arguing between each Programme at a local level rather than regional issues. This is compounded by the fact that a number of schemes are 'cross-authority' with lead authorities holding the contract, it is difficult to see how this will pan out if priorities change locally or funding is moved to another programme/s from SP. This could make some regional schemes unviable.

1.4.3. Over the years the Gwent RCC has aligned itself with a number of regional collaborative arrangements including the Substance Misuse Area Planning Board, Office of the Police and Crime Commissioner/Safer Gwent, Regional Partnership Forum, ABUHB In One Place initiative, Gwent Social Services Transitional Team, regional housing market assessments, Regional Homelessness Plan, VAWDASV Team and strategic planning, Gwent Regional Providers Forum.

1.4.4. The removal of SPPG/SP as a distinct budget line in 2019/20 is a real worry for the sector as a whole, not least that SPPG funding was agreed to be protected for the next two financial years in the recent WG budget 'deal'. SP works with a number of 'unpopular' client groups and there is a fear that services for children will take priority. This whole initiative has been clouded in secrecy, deals done behind closed doors between senior officers and officials which goes against the current maxims of open and transparent government and consultation. Such an important and massive change should not have been implemented in this way and have been conducted in a more open, consultative and collaborative way.

1.5. The lessons to be learnt from the mixed effectiveness and impact of regional working over the past five years.

1.5.1. Working with colleagues on a regional basis has been pioneered in Gwent since 2002 when the first SP officers employed under 'new burdens' funding were almost forced to work collegiately to develop the programme, often in the early days as 'lone workers'. This was given an extra push when the mantra from Welsh Assembly Government was to 'maximise the (THBs) pot'.

1.5.2. This led to a massive increase in Housing Benefit claims due in no small part to creative/innovative schemes developed by lead officers across regions/Wales. Gwent teams went on to harmonise paperwork and processes for teams and providers, reviews and monitoring arrangements and employ a regional development officer to enhance the programme's cross-authority work.

1.5.3. A number of good outcomes ensued: establishing a multi-agency regional planning group, identifying gaps in provision and jointly commissioning/funding projects, getting better VFM from providers. Separate officer groups were also set up around planning and data, contracts and monitoring etc. but all was put on hold with Aylward. This had the effect of curtailing developments, replacing a tried and tested governance structure with a more bureaucratic process that has delivered less. We were victims of our own success!

1.5.4. Another consequence was that other areas were forced along this new way of working and 'blamed' Gwent for this upheaval. 'Regionalising' quite different LAs e.g. Cardiff and the Vale of Glamorgan was never going to be easy with its different demographics, political power etc. Aylward was right to recommend that local strategic planning arrangements should be implemented/strengthened BEFORE moving to a regional structure and now SP would have been more embedded within the LSBs (now PSBs) if this had happened i.e., a more strategic approach rather than the 'forced marriage' of the RCC.

1.6. The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Well-being of Future Generations (Wales) Act 2015 (WoFG Act);

1.6.1. Collaboration, co-production and sustainability, core themes of the WoFG Act, are stymied by annual funding, piece-meal planning and lack of joined-up strategic working across partners. Funding Flexibilities impact has yet to be analysed but likely to impact negatively on regional collaboration at the expense of more local collaboration in delivering local Well-being Plan priorities.

1.6.2. This is symptomatic of the approach to the Programme taken by those who devise change i.e. let's shoehorn SP into other agendas, strategies, priorities without thinking about what the Programme is fundamentally about i.e. housing, housing-related support and the prevention of homelessness.

1.6.3. The supported housing sector was born out of the Housing (Homeless Persons) Act 1977 which resulted in funding for non-statutory single homeless people and childless couples via hostels, refuges etc., this should not be forgotten. Yes the Programme will contribute to the wider WoFG priorities and objectives along with specific projects developed by local authorities but this should not deflect the sector from its everyday important work which may not align itself with all the WoFG Act's objectives.

## **2. Monitoring and evaluation including:**

2.1. How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring;

2.1.1. NCC use a partnership approach with very regular meetings with contracted partners informed by invoices, schedules, SP Pricing Policy, SP8 project finance forms, GNMEs (needs mapping forms), Abris referral and process information/reports, outcomes data etc. Re-modelling and re-pricing before decommissioning and re-tendering. Outcomes are checked against individual support plans in reviews, alongside service-user and ex-service-user interviews.

2.1.2. In addition periodic fuller reviews are conducted with recommendations and action plans followed up in the regular partnership meetings. All decisions on funding are approved by the SP Planning Group with regular updates on expenditure, underspend and progressing schemes 'off the shelf'. All decommissioning decisions are approved by the SP Planning Group as well as any remodelling of schemes. The SPPG Spend Plan is approved by the SP Planning Group and Cabinet Member prior to RCC approval.

2.2. The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework;

2.2.1. There are concerns that reducing the number of steps from 5 to 3 will result in a meaningless process as nearly all scores will be in the muddled middle giving no degree of real progress (or decline). Outcomes should also be read/analysed in conjunction with better use of case studies, exit interviews/forms, review interviews with service users, ex-service users and stakeholders, the Improving Lives document – a cost-benefit analysis, Cap Gemini report etc.

2.2.2. The current system is not perfect but is at least attempting a difficult task in representing a person's journey through support intervention/s over time. Yes it is

time-consuming for all involved in the data-inputting, collation and analysis but that could be improved with better on-line IT/software packages e.g. a portable 'App'.

2.3. How any revised outcomes framework arrangements can be best communicated and embedded;

2.3.1. It has to be credible, easy to read/understand, and have appropriate resources behind it, e.g. SAIL. Use of conferences, documents, local sessions, good guidance/manuals, use of social media. Get SP teams up-to-speed first to cascade the same/consistent message to providers across Wales. SP teams regularly offer training sessions to providers on the framework, especially as staff change. This has staff capacity issues for all so new burdens funding should be considered.

2.3.2. Develop good IT systems, databases that are user-friendly and available on-line (cloud). Develop a reliable APP for use on laptops, tablets and SMART phones so that information can be inputted at the support session and signed off by both the service user and support worker immediately and down-loaded onto the system.

2.4. Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services;

2.4.1. SP teams have developed many versions of cost calculators, SP Pricing Policies, so officials and external agencies need to talk to SP Teams to see how VFM has been achieved through the application of the above along with the re-modelling of schemes, mergers, re-pricing etc.

2.4.2. Caution is needed here as you have to measure/compare very similar/like-for-like services and not just use simple comparisons like one client group or floating support as there are many shades of support, level of support, specialisms, economies of scale, rurality/travel etc.

### **3. The distribution of Programme funding and financial planning;**

3.1. The issues that need to be considered in developing and implementing any new funding formula;

3.1.1. Agree variables/criteria and weighting to be used but must have a homelessness factor, poverty factor, health factor as well as pure demographic

data and other data sources. Has to link to purposes of the grant, grant conditions, guidance and local needs mapping.

3.1.2. This issue will be made more complex with any implementation of flexible funding, the outcome of the Supported Housing Review and general cuts to programmes and local authority funding. Any change to current levels of SP funding will have a knock-on effect on the flexible funding regime and could lead to a reduction in fixed-site supported accommodation projects, development blight as housing association partners are scared off funding new schemes when revenue funding is not secure (25 year mortgages/rent streams). Aversely, more funding could be swallowed up/be diverted to the other programmes or pseudo-statutory services to shore up cuts to local authority services.

3.1.3. Whatever new scheme is implemented it must be done in a phased way to minimise disruption to existing services and service users. There will be casualties, schemes will close, smaller specialist providers may go out of business and the good reputation of the Programme built up over many years will suffer.

3.2. How budget pressures and funding uncertainty have affected service planning and delivery;

3.2.1. Effects include: LA cuts to staff/teams, not replacing staff, pressure on homelessness, social care, DToC figures, ageing and unhealthier/more disabled society, welfare reform lack of increase in income, insecure jobs, zero-hour contracts, high staff turnover as services are squeezed, Brexit, quality and pay staff well but less services conundrum?

3.2.2. The annual grant mitigates against strategic planning, limping from one year to the next with the fear of accruing underspends = potential claw-back from WG. Pilots leave staff unsure of continued employment and leave early, can't replace staff in time = claw-back.

3.2.3. Funding Flexibilities, combined with the disappearance of SP/SPPG as a separate budget line in 2019/2020, despite WG assurances, will exacerbate problems and lead to a climate of uncertainty, development blight, housing associations pulling up the development drawbridge, not offering re-modelled schemes for alternative use and SP funding being syphoned off for non-housing-related support activity/schemes.

3.2.4. A three-year secure budget is needed for the sector to be able to plan strategically within that funding envelope and it is ironic that, just as England has recognised its folly in not keeping the ring-fence on SP funding which has led to a decimation of services, Wales is contemplating removing the ring-fence on SP for the sake of perceived/notional administrative savings.

3.2.5. Lumping SP in with children's programmes is hard to understand, what is the rationale for this change? Where was the consultation? Why were programme leads kept in the dark and still not privy to the content of the bids/expressions of interest? Funding is more likely to go to children's services than 'unpopular' client groups that the sector has worked hard to develop over many decades. Local authorities would not have developed these schemes out of choice, no it has been the supported housing sector that has achieved this position.

3.2.6. The sector is not averse to change that has been evidenced, consulted on and refined. There is a natural synergy with some of the proposed grants lumped together in the proposed 'supergrant'. For example homelessness grant and Rent Smart grant and to a lesser extent Communities First legacy funding particularly now that the SP Programme will continue to work on financial inclusion matters/the welfare reform agenda.

3.2.7. It would be better if these housing/welfare grants were aligned with SP rather than children-focused grants as it has to be remembered that the Programme is concerned with supporting people over 16 years old, but the great majority of work is focused on people over 24 years old, the elderly and people with care needs.

3.2.8. In addition, it is unclear whether the recent announcement from the First Minister of an additional £10 million homelessness grant for young people in 2019/20 would be included in the Early Intervention and Prevention/super grant pot. If this funding is not continuous revenue funding (year-on-year funding) it is likely that follow-on funding would be sought from Supporting People Programme grant, as has been the case with schemes developed under the homelessness New Burdens funding which have been picked up by SP following the phased reduction to zero funding for this grant.

3.2.8. A general impact assessment has not been published on these changes neither an Equalities Impact Assessment. These changes could have a real negative



effect on some client groups covered by the Equality Act's protected characteristics and lead to potential challenge.

3.3. Reasons for the identified wide variation in financial support for different client groups across local authorities;

3.3.1. Some reasons: Historical legacy; Unrealistic/different Housing Benefit claims submitted under the THB scheme; subsidizing of social care/services and varying degrees of success in re-allocating resources. Where SP is located in LA structures can produce a different emphasis on services developed. Steer/influence from planning groups, members, council priorities, strong/influential local voluntary sector staff, SP lead officer personality/drive to change. The failure of some LAs to max THB pot/recognise the opportunity, failure to develop schemes under Section 180 funding, political interference/objections. (Wrongful) The (wrongful) use/non-use of 'new burdens' funding to enable the building of strong SP teams. The failure to obtain a higher profile for the programme locally. The evident inexperience of LA staff in this area at the start of the programme in 2000/2001. The stop-start implementation of the distribution formula exercise.

3.3.2. Fixed support schemes are still there but may have been over-funded (THB 'top-up') or re-modelled to floating support (non-resident visiting support) e.g. sheltered housing, supported living, *extra* Care housing. It is easier to commission and de-commission floating support services as it takes a very long time to develop a new supported housing scheme, sourcing capital funding problems, SHG priorities for the elderly, families etc. Pilot SP schemes (off the shelf schemes) that use underspends are nearly all floating support. Re-modelling schemes creates 'resettlement' support rather than lose funding.

3.3.3. Some fixed schemes are past their 'sell-by' date and are not fit for purpose e.g. some old refuges/shared schemes and have been de-commissioned, sold off or returned to general needs housing. Properties owned outright by providers (non-SHG funded schemes) mean the owners can do as they wish and sell. Levels of funding for fixed schemes may have gone down following and assessment of housing-related support need for the individuals and the reduction in funding picked up by social services and/or health.

3.3.4. The use of different value-for money assessments carried out by SP Teams across Wales i.e. cost-calculators or SP Pricing policies will produce a variation in funding between client groups and across different services. Those councils that

have lost out due to cuts AND the distribution formula may pay less to certain client groups than others or cut funding altogether.

3.3.5. Some SP teams/councils have bitten the bullet on over-subsidizing certain client groups with SPPG funding i.e learning disabilities whilst others have not due to political pressures as it is acknowledged that any shortfall would have to come from social services funding adding to council budget pressures.

3.4. The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns.

3.4.1. Nearly all NCC schemes have been re-modelled since 2003 based on emerging need e.g. complex needs, greater independence, rough sleepers, refugees, welfare reform etc. Gwent SP teams have a proven, robust planning process involving a wide range of stakeholders and service users. Intelligence gathering can always be improved but we have to remember that we are in the business of housing-related support not health, therapeutic services, mini-secure units, befriending services etc.!

3.4.2. The planning process includes: analysis of Gwent Needs Mapping Exercise forms, referral forms, Abritas housing and homelessness information, Welsh Index of Multiple Deprivation LSOA data, Daffodil data SAIL data, Public Health Observatory data, Population Needs Assessment data (Gwent Social Services), ONS data and reports, substance misuse data, NOMS data, PSB ward data, review data and information from stakeholders, staff and service users (including ex-service users), regular partnership meetings/contract compliance meetings, monitoring data including invoice and schedule data, emerging regional data and information on needs from regional SP colleagues, SPPG Project Proposal forms, SP Planning Group meetings, Cabinet Member briefings and Local Commissioning Plans and approval feeding into the Regional Strategic Plan.

3.4.3. The above robust planning process clearly shows the detail that goes into determining the major changes in services across the region from the historical legacy position in 2003. All NCC schemes have been re-modelled or de-commissioned to reflect identified need, over-supply or the lack of need for particular client groups/schemes.

3.4.4. Funding is targeted to those in most need on an individually-assessed basis through our Gateway referral and assessment process that has seen a steady

increase year-on-year in the number of people supported and a greater throughput/churn of service users.

A final word. The WAO report based a number of its recommendations on information gleaned from 2015/16. Services have changed considerably since then as the RCC has become more embedded, the sector as a whole responding to changing external factors including welfare reform, changing WG priorities and new legislation.

It would therefore be pertinent to undertake further, follow-up research/report in the near future to see the hard work undertaken locally by both SP teams and support providers to address these issues.