Cynulliad Cenedlaethol Cymru | National Assembly for Wales Y Pwyllgor Cyfrifon Cyhoeddus | Public Accounts Committee Rhaglen Cefnogi Pobl Llywodraeth Cymru | The Welsh Government's Supporting People Programme PAC(5) SP 09 Ymateb gan Pwyllgor Cydweithredol Rhanbarthol Gwent | Evidence from Gwent Regional Collaborative Committee

Gwent Regional Collaborative Committee (including responses from the Gwent Regional Provider Forum)

- 1. The Impact of wider policy development on the programme including:
- The overall clarity of the Programme's objectives:

There is a general feeling that the Programme's objectives had been clear i.e. a Programme that delivered housing related support; but during the past couple of years this has become less clear. 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.

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 which now needs to be re-defined and promoted.

Ideally going forward the objectives should be made clearer about the prevention of homelessness and increasing independence for vulnerable people; whilst also highlighting the benefits of the Programme including helping people to have a home (shelter and warmth) which is a basic human right, which all other quality of life factors stem from.

Various Ministers have had oversight of the Programme during the past few years, each bringing slightly different ideas of what the priorities for the Programme should be. Updated guidance provides an opportunity to be clear about the priorities for the Programme.

• The implications of, and emerging response to the UK Government's Supported Accommodation Review:

The UK government's Supported Accommodation Review has recently been developed into a new policy that is subject to further consultation, but short-term, traditional supported housing funding for 'top-up' funding will be devolved to WG. 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'.

LHA rates no longer applying to supported housing and social housing is welcomed. (this should also apply to the private rented sector – especially in Wales where LAs can discharge duty into the PRS and UK wide as the PRS is the growth tenure alongside the limited availability of affordable housing) that people are increasingly relying on. Since the recent current central government consultation on the SAR financial models – defined down into sheltered/extra care, long term supported housing and short term supported housing – it is essential that:

The 3 definitions are clearly understood

That there is a mechanism in Wales to ensure that sheltered/extra care rents are regulated.

That Supported Housing in Wales is accurately 'supply mapped' to include growth and schemes in the pipeline.

That the Wales pot is maximised and hypothecated to SH, (not used elsewhere).

That the short term funding financial model/administration is based upon commissioning arrangements undertaken by LAs in alignment with SPPG revenue funding, (with scope for SP teams to manage).

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. Or put the funding back in Housing Benefit departments which will now continue to provide this service for sheltered and longer-term accommodation. To achieve better value for money however it would be better placed in Supporting People arena and managed by the Supporting People Teams to assess real premises/scheme costs. This would also enable a

more strategic overview of services as is being envisaged in England (re-inventing SP!) e.g. audit total scheme costs, cross-subsidy issues etc.

WG needed to learn from what happened in England, when the removal of SPPG ring fence led to lots of costs being transferred to Housing Benefit to allow projects to continue, then making this 'pot' more expensive and as such a target for focus and cuts.

Various concerns about the insecurity for RSL's being able to agree new developments due to lack of certainty over the future of funding for new schemes.

Although it seems that Long term services now seem to be removed from the impacts of this Review, and funding will remain within the Welfare Benefits / Housing Benefit system. There is still massive uncertainty for short term projects, and how these will be funded.

• How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments:

Can be achieved by:

Having clear, unambiguous guidance and Terms & Conditions of Grant; reflected in WG, LA and partner websites.

WG inter-directorate meetings/briefings.

WG attendance at relevant meetings, conferences, forums etc. capacity of SP Teams to be able to also attend meetings etc. publicity campaign. Bulletins are good, if over-long, showing the complexity of the programme.

Greater use of social media.

Simplify the message about the prevention of homelessness, benefits/cost reductions to other public sectors.

Improve collaborative working across WG directorates and policy – e.g. reference to SP in other legislation guidance and policy.

Raise SP Programme with PSBs across Wales.

By being more co-ordinated in requests for the programme to consider prioritising, and giving time for this to be a planned response e.g. working

alongside the ACE's hub to implement consistent and evidence based tools / outcomes measures.

Improved communication and collaboration is needed across WG departments by ensuring that the Supporting People Programme is understood by policy makers and influencers and the impact that delivery of the programme has on individual lives – SP funding helps to ensure the right support if provided when and where people need it and does have a positive impact on public services such as health and welfare etc.

• How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements:

The Gwent RCC has established strong links, ensuring members are attending other relevant meetings, boards and forums e.g. VAWDASV Board, RPB, etc, and there are links for regular two way communication.

Gwent RCC has also pro-active in co-opting non-voting members e.g. Tai Pawb / OPCC / Police/ Youth Offending Service etc. Getting Health representation from 'operational' health services has been the biggest challenge, with Public Health Wales having been a regular, and engaged, member from the beginning.

Insisting that there is RCC representation on PSBs would be helpful and non-Social care representation on RPBs.

A number of current issues may mitigate against progress and concern has been raised about how 'flexible funding' 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 PSB, regional PSB, RCC or RPF? What role would local planning groups and Cabinet Members have in this new proposal?

What if there is conflict between RCC/Regional priorities and local priorities?

WG need to ensure they implement the recommendations from the WAO and other previous reports.

• The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years:

This is covered in the governance reviews of annual reports and the WG/WAO audits. WG responsibility to monitor recommendations.

Annual budget allocations have not supported pro-active planning and along with the on-going risk of cuts since 2013; most new projects have been limited to 'pilots' in order to provide a buffer against cuts, and protect existing services should the budget reduce.

Request for WG to clearly re-state the aims and mission of the Programme; and to publish the updated SPPG Guidance.

Also it's important to make the most of the resources available, particularly while the WG SP team is so short staffed e.g. using the RDC network for two way communication between the RCC's and WG.

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 collectively to develop the programme, often in the early days as 'lone workers'. 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. 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.

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.

• 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:

Supporting People provides 'preventative' support, to prevent individuals reaching crisis points e.g. homelessness / worsening mental health / offending behaviours and contact with the criminal justice system / being respectful neighbours and members of local communities. All of which build resilience and protective factors for both that individual's future, but also the future of any children they may have.

Collaboration, co-production and sustainability 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 Wellbeing Plan priorities. This is symptomatic of the approach to the Programme 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. The supported housing sector was born out of the Housing (Homeless Persons) Act 1977 which resulted in funding for non-statutory homeless people via hostels, refuges etc. ..this should not be forgotten. Yes the Programme will contribute to the wider Well-being of Future Generations priorities and objectives along with specific projects developed by local authorities but this should not deflect the sector from its everyday important work.

Longer term budget awards to assist in sustainability agenda could help improve commissioning arrangements especially where capital applies. Gwent SP teams are skilled at managing the Programme through a Well-being of Future Generation lens. Greater links with the PSB could assist.

- 2. Monitoring and evaluation including:
- How monitoring / outcome data is use to inform decision making about programme expenditure and contract monitoring;

Across Gwent data use is well embedded to inform decision making about the Programme with regular meetings held with providers informed by invoices, schedules, SP Pricing Policy, SP8 project finance forms, GNMEs (Gwent Needs Mapping Exercise forms), outcomes data etc. Re-modelling and re-pricing are considered before decommissioning. In addition periodic fuller reviews are conducted with recommendations and action plans followed up in the regular partnership meetings. Information is reported to local planning groups and the RCC as required and relevant.

General feeling that WG SPPG Outcomes have been difficult to use to analyse decision making due to limited faith in their meaningfulness and as such their usefulness for this. They need to be better linked with e.g. Homelessness definitions under legislation, rather than being 'standalone' as currently.

Ensuring that sustainability of services is key. Retendering every couple of years or even retendering when you could extend provision is not helpful.

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

There is a lot of concern and resistance to the scoring system being changed from 1–5 to 1–3, as this would effectively render the system meaningless as there would be even more limited scope to show progress, and concern that most people would end up on point 2 for most of their journey, this will not allow the individuals being supported to see that they had made progress either.

There was a suggestion about consideration being given to involving ONS in development of a new system, as they could advise on the basis of evidence based good practise, also the use of Well Being Score cards.

Consideration to be given as to whether there should be different systems for monitoring long term and short term schemes.

Should also be used in conjunction with better use of case studies, exit interviews/forms, review interviews with s/users, ex s/users and stakeholders.

Improving Lives document - a cost-benefit analysis and Cap Gemini report.

Greater consistency across Wales in terms of type of data collected, what is direct and indirect costs and expected impacts/outcomes required Monitoring and evaluation of the programme

 How the revised outcomes framework arrangements can be best communicated and embedded;

Clear new outcomes framework arrangements to be developed.

Training and transition resources and implications to be factored in and will need to be appropriately resourced. This would enable all providers and LA areas to interpret and use in a consistent manor.

Social media, leaflets, websites, conferences, seminars etc

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

An element of sustainability monitoring i.e. the benefits following the official end of support could be really useful.

Assessing the different outcomes for long term & short term projects, and possible certain client groups.

Cost calculators, SP Pricing Policies, talk to SP Teams to see how VFM has been achieved: re-modelling of schemes, mergers, re-pricing etc.

Gwent SP teams are skilled at assessing VfM. This skillset/knowledge/ experience is exemplary and could be used as good practice.

Assessment of regional need is key to ensuring where funding should be directed and type of service required that responds to the need of the very vulnerable

## 3. The distribution of Programme funding and financial planning including:

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

An appropriate distribution based upon need still requires addressing. 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. Housing markets, supply per capita etc. should be considered. Has to link to purposes of the grant, grant conditions, guidance.

Concerns around full Funding Flexibilities, and then from 2019+ (if the SP budget line disappears), the danger that we could see a split between 'deserving' and 'undeserving' groups, with funding being prioritised for those groups who have a lot of public sympathy e.g. children and families, when compared with e.g. substance misuse / offenders etc.

Concern that the Housing related support and homelessness prevention specialist/expertise could be lost from the sector (including commissioning awareness) if funding is to be focussed more on social services / care type services.

A plea to learn from the experience in England when the ring fence was removed from SP, and in some LA areas SP services disappeared.

A light touch approach to meeting demand for the vulnerable will only cost more in the longer term. WG need to consider the longer term impact of removing ring–fenced Supporting People funding entirely for 2019/20 and also to some degree in 2018/19 risks the lack of focus on people who are at risk and facing live changing challenges such as homelessness and abuse. WG repeatedly refers to value for money within the Supporting People programme's documentation, making it clear that it wants Supporting People funding to be used for initiatives that prevent the need for more costly interventions by Health and Welfare services.

• How budget pressures and funding uncertainty have affected service planning and delivery:

Budget pressures and funding uncertainty affects service delivery, much mitigated by the professionalism and maturity of the sector (LAs and providers) working together to maintain VfM, strategic planning, commissioning and procurement to try and stabilise good service provision.

Additionally:

- Year on year risk of 10-20% cuts in SP
- Welfare reforms lack of increase in income
- Supported Accommodation Review
- In an environment where there has been little guarantee of future funding, RSL's have been reluctant to commit to new developments to allow new static schemes to be developed.
- LA cuts to staff/teams, not replacing staff,
- Pressure on homelessness, social care,
- Ageing and unhealthier/more disabled society,
- Insecure jobs, zero-hour contracts, high staff turnover as services are squeezed,
- Pilots leave staff unsure of continued employment and leave early, can't replace staff in time = claw-back?
- The risks of accruing underspends = potential claw-back from WG do not help with long term planning

The lack of uncertainty of future funding does not allow for consistency of service delivery, specialist providers will and are disappearing, skills and knowledge gaps will develop and the impact on the public purse will increase as more pressure will fall onto other public services

ALL of these contribute to difficulties for RCC's and LA's in terms of robust forward planning, Uncertainty, cuts planning and annualised budgets can result in some knee jerk commissioning impacting upon operational delivery. Often resulting in pilot projects of a floating support nature being implemented in areas to fill needs gaps; so that if funding could be withdrawn the following financial year, and cuts were to be implemented, without risking the closure of too many existing schemes, affecting both service users and staff.

 Reasons for the identified wide variation in financial support for different client groups across Local authorities; There is a general concern that this comment is based on a spurious notion that 'value for money' is as easy as comparing unit costs across projects, which risks not comparing like with like, or, taking into account local drivers e.g. higher transport / travel costs and time for rural areas, and pays no attention to outcomes for projects. Additionally multi/complex high needs v very low needs, peripatetic services v accommodation based costs, engagement rates across client groups, clients in situ v non, additional investment streams contributing (HB, Health, Social Care, ICF, etc) v non.

While definitions of schemes might make them seem similar, this needs to be carefully assessed to ensure that ONLY directly comparable schemes are being compared.

A lot of this has been dependant on local and regional needs assessments; in Gwent this has included consideration of Service users and stakeholders consultation days.

The WG has consistently highlighted the need for value for money in the support and services paid for by the Supporting People programme. We therefore need to understand cause and effective and then tackle the cause not the effect! We know from recent social value reports that early and appropriate intervention will see some level of saving and in some cases these savings will be substantial – especially when compared to the amount that has been spent on supporting a client

• Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support;

See above re comments in point 3 of this question.

In Gwent the RCC identified that Learning Disability spend was very variable across the 5 LA areas, and prioritised this for further investigation / action due to concerns that SP was funding care provision in some LA areas more than others. This led to a reduction in some projects based on individual needs assessments, and a re-distribution of the funding to other priorities (sometimes pilots – as previously mentioned).

The Aylward Review also required a re-focus of Older Person's support to focus on individually assessed need for support, and making support tenure neutral, i.e. taking it away from static / accommodation based schemes, and making it

available to older people in their own homes (wherever this might be in the local community).

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

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, some owned outright by providers and they can do as they wish...levels of funding for fixed schemes may have gone down BUT they may still be there just funded by Social Services or health more proportionately following a HRS assessment of individuals based on need.

SP contracts based upon hours or flexible floating support and only referencing fixed sites.

• The extent to which local and regional planning processes and spending reflect well evidenced needs rather than historical patterns;

Gwent has a proven robust planning process involving a wide range of stakeholders and service users and there is an excellent history and legacy of SP local and regional planning across Gwent.

Intelligence gathering can always be improved and the current inclusive and strategic planning process seeks to do this on an on-going basis, which evidences that there are still some pockets where spend needs to shift further to evidenced need from historical patterns