

We provide a range of services funded by the Supporting People Programme, including Supported Accommodation for young people and women, Domestic Abuse Refuges, floating support for vulnerable people to maintain their tenancies and tenancy crisis support for people at risk of losing their tenancy. Every day we see the difference that Supporting People funding makes to the most vulnerable people in society, enabling them to use their strengths to live independently and purposefully in their communities. We are extremely concerned by the Welsh Government's proposal to remove the ring-fence from the Supporting People Programme, since evidence from England clearly shows the impact on Supporting People services and a subsequent rise in homelessness. Given the uncertainty caused by the UK Government's Supported Accommodation Review, it is vital that a ring-fence remains in place for Supporting People funding, and that the funding sits alongside homelessness prevention and housing related work to ensure its primary focus is retained.

1. The Impact of wider policy developments on the programme

a) The overall clarity of the Programme's objectives

Llamau feels that until recent years there was clarity over the purpose of the Supporting People Programme, in that its objective was to provide housing-related support to help vulnerable people to live as independently as possible. However, in recent years, a number of RCCs have received communications from Welsh Government asking them to focus on areas of work, including domestic abuse prevention, support for care leavers and other vulnerable young people and homelessness prevention.

We welcome the Welsh Government's review of the strategic objectives of the programme to ensure greater clarity amongst providers of Supporting People services, however we strongly believe that it is vital that homelessness prevention and housing-related support remain at the heart of the objective of supporting people. Supporting People services excel at preventing homelessness and ensuring that vulnerable people are able to live independently, and the loss of this expertise

would have a significant impact on other public services, particularly health services and criminal justice.

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

As a provider of short-term supported accommodation, we remain very concerned about the UK Government's Supported Accommodation Review. Although the UK Government has now confirmed that long-term Supported Accommodation will not be subject to Local Housing Allowance, there remains significant uncertainty about how costs for Short-term Supported Accommodation will be covered. The UK Government's White Paper outlines that for short-term supported accommodation in Wales and Scotland, "an equivalent amount will be provided for those administrations to decide how best to allocate the funding." The paper goes on to say that the administrations will be provided with an amount in 2020/21 equivalent to that which would otherwise have been available through the welfare system. We are very concerned that no commitment has been made to increase this funding as demand for services increases, and remain extremely concerned that funding in future years will be capped at the 2020/21 level despite likely increases in cost, given the projected increases in homelessness and the difficulty in finding affordable move-on accommodation. Given the pressures this is likely to create on short-term accommodation, it is vital that the Welsh Government continues to ring-fence funding for housing-related support and homelessness prevention, in order to avoid further cuts to services designed specifically to prevent homelessness.

Furthermore, with the funding due to be devolved from April 2020, we are concerned about the amount of work to be done to develop a new and fair funding system in Wales.

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

Communication about the priorities for the Programme and the impact of wider developments needs to be more coordinated so that all local authorities and providers clearly understand what the priorities for the programme are. With the development of other legislation in Wales, it is vital that everyone understands the implications of other legislation on the Supporting People Programme and whether that changes priorities, particularly with consideration of how the early intervention

and prevention work delivered under Supporting People ties in with new legislation. We would also welcome the Welsh Government giving providers more time to respond to the new priorities and ensuring that it is coordinated alongside the ACEs hub to implement consistent evidence-based tools and outcomes measures.

d) How best to align the work of the Regional Collaborative Committees with other collaborative governance arrangements

In order to ensure alignment, it is vital that members of Regional Collaborative Committees attend other relevant meetings, including the VAWDASV Boards and Public Service Boards, ensuring that there are links for regular two-way communication. We have also seen significant success in securing non-voting members of the Regional Collaborative Committees, particularly from PCCs and Public Health Wales, although it has been significantly harder to secure involvement from operational health services.

The creation of Public Service Boards for each local authority presents some challenges in ensuring representation at each PSB within the region, and would welcome the consideration of creating Public Service Boards at a regional level.

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

Our experience through representation on a number of RCCs is that there are significant differences in the commitment to regional working between regions. Some regions have embraced regional working and have introduced additional measures outside of the Regional Collaborative Committees to ensure that key pieces of work can be progressed across the region, and to ensure that the needs of key groups of vulnerable people are met consistently across the region.

In addition, annual budget allocations make it difficult for regions to pro-actively plan to meet need, and have often resulted in new projects being introduced as pilots with limited opportunity to extend the project beyond its first year. This limits innovation and limits the amount that Regional Collaborative Committees can do to respond to emerging needs.

Furthermore, the proposed amalgamation of several funding streams from April 2019 is likely to stifle the ability to pro-actively plan and to respond to emerging need further, since additional pressure will be placed on Supporting People

services, with the possibility of significant cuts to services. We are extremely concerned that priority will be placed on the other funding streams which form part of the merged grant, with significant risk of the complete loss of Supporting People service and the resulting devastating impact that we have seen in England.

f) The extent to which the governance and management arrangements for the Programme reflect the ways of working expected under the Wellbeing of Future Generations (Wales) Act 2015

The Supporting People Programme is crucial to the ambitions of the Wellbeing of Future Generations Act. At the heart of the Programme is the prevention of homelessness and support to reduce the risk of future homelessness. The Programme also prevents the use of other public services in future including criminal justice services, mental health and other health services. The programme allows us to work with people and ensures that Wales is working towards the Wellbeing Goals set out in the act by building resilience and a more prosperous future for those the Programme supports, but also improving the wellbeing of the children of those the Programme supports.

There does, however, seem to be a limited link between governance and management arrangements, with no guaranteed collaborative working between Public Service Boards and Regional Collaborative Committees. Further work could also be done to identify ways of measuring the impact that the Supporting People Programme has on the delivery of the Wellbeing of Future Generations (Wales) Act.

2. Monitoring and Evaluation

a) How monitoring / outcome data is used to inform decision making about programme expenditure and contract monitoring

The Welsh Government outcomes which are used to monitor Supporting People performance have been difficult to use to inform programme expenditure and contract monitoring. This is largely due to a lack of consistency in the monitoring of outcomes employed by different local authorities and by different providers. In addition, whilst the monitoring process attempts to measure progress, there is no base line to give meaningful data on the effectiveness of support interventions. This has resulted in limited faith in their meaningfulness and a hesitancy to use the data to inform decisions. Furthermore, there is little link between the measurement of other areas of work and Supporting People, particularly the Violence Against

Women, Domestic Abuse and Sexual Violence (Wales) Act, Wellbeing of Future Generations (Wales) Act and the Housing (Wales) Act. At the moment, the outcomes monitoring for the Supporting People Programme does not allow for any measurement of its contribution to these areas of work.

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

We are very concerned about the Welsh Government proposals to introduce a three-point scoring system for Supporting People outcomes. We strongly believe that the current five-point scoring system has serious limitations in allowing organisations to demonstrate the progress people have made, and believe that the three-point system will limit this further. In addition, the proposed system could have a negative impact on the progress that people make, since in reality most are likely to be scored on the middle point throughout their support, and will not understand themselves the progress they have made while being supported.

We strongly believe that the proposals should include the introduction of different outcomes monitoring for short and long term schemes. There is huge variation in the length of support offered between different schemes, and it should be acknowledged that the same progress cannot be made on a shorter-term scheme. An outcomes monitoring system could be developed to demonstrate the value of schemes of all lengths fairly.

At Llamau we have been doing some work with the Office for National Statistics on outcomes monitoring and believe that consultation with them would lead to a more valuable method for measuring the outcomes for the Programme.

c) How any revised outcomes framework arrangements can be best communicated and embedded

The introduction of any new outcomes framework arrangements needs to be clearly and consistently communicated to both local authorities and to providers. Consistent training should be provided to all local authorities and providers to ensure a consistent understanding of the new framework. Ongoing monitoring of the local authorities' and providers' use of the framework would ensure future consistency.

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

Monitoring and evaluation of the Programme would be significantly strengthened by a robust approach to monitoring the sustainability of the outcomes. This could be delivered through the linking of different Welsh Government data sets to demonstrate the impact of the Supporting People programme in reducing future costs to services such as health services and criminal justice services.

The introduction of monitoring of repeat referrals would further strengthen the evaluation of the Programme, and ensure that providers are delivering support which enables people to live independently and which limits the chances of future referrals to other Supporting People services.

In addition, as already outlined above, we believe that the outcomes monitoring could be improved through the introduction of tailored outcomes monitoring for different interventions, with different data collected depending on the length of support provided, or potentially depending on the client group supported. This would allow clear objectives to be set for each type of project with clear measurement of whether those objectives have been met.

3. The distribution of programme funding and financial planning

a) The issues that need to be considered in developing any new funding formula

We have significant concerns about the introduction of full Funding Flexibilities and the risk that Supporting People will not be ring-fenced from 2019. We have major concerns that this could lead to a significant cut to Supporting People funding which would lead to a significant increase in homelessness, with the most vulnerable likely to be at the highest risk. Without the ring-fence for Supporting People, there is a significant danger that funding could be prioritised for those groups of people for whom there is greater public sympathy, such as children and families, while those groups for whom there is limited public sympathy, such as offenders and young people could lose funding.

The proposed amalgamation of Supporting People with other funding streams also presents a substantial danger that expertise in homelessness prevention and housing-related support could be lost from both service providers and from local authority commissioners. The danger is clear to see when we look at the evidence from England when the Supporting People ring-fence was removed, resulting in the decimation of Supporting People services and a significant increase in homelessness.

b) How budget pressures and funding uncertainty have affected service planning and delivery

For a number of years, there have been significant funding uncertainties, often with the risk of 10–20% cuts to Supporting People Budgets. Coupled with annual budget allocations, welfare reforms and the Supported Accommodation review, this has made it extremely difficult for Regional Collaborative Committees and Local Authorities to plan adequately for the future. It has often resulted in the development of in-year pilot projects for floating support, allowing for the possibility that funding could be easily withdrawn in the following year if necessary. In an environment where there has been little guarantee of funding, Registered Social Landlords have been reluctant to commit to the development of new static schemes to support vulnerable people to live independently.

c) Reasons for the identified wide variation in financial support for different client groups across local authorities

We have some concerns about the way in which the variations in financial support for different client groups have been derived. Recent cost analysis has not taken into account the size of schemes, and as a consequence have inferred that more expensive schemes' costs are too high. This has not taken account of the fact that smaller projects for young people deliver more effective outcomes, since they are more able to support people with complex needs. Current analysis has been a very crude tool which would not stand up to any scrutiny. We would be concerned if these variations continue to be calculated based simply on unit costs, which risks not comparing like with like. In order to determine value for money, it would be essential to ensure that truly comparable projects are compared, and that factors such as the objectives of the project, the client group being supported and possible additional costs like travel costs for projects in rural areas are considered in the calculations. For example, the difference between 24 hour and non-24 hour projects must be taken into consideration, with 24 hour projects typically working with people with the most complex needs. Whilst both types of project have their place, they should not be compared.

It is likely that some variation in financial support for different client groups has resulted from variance in regional needs assessments which will have identified varying needs at a local level.

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

As already outlined above, continued funding pressures coupled with annual budget allocations have often led to the development of in-year pilot projects, which are often floating support projects, rather than fixed support projects to enable the project to be ended easily after the pilot period.

We are also aware that the Aylward review required a re-focus of support for older people based on individually assessed needs and ensuring that support is tenure-neutral. This resulted in the development of more support delivered to older people in their homes, rather than in fixed support settings.

In addition, the Gwent Regional Collaborative Committee identified that spend on support for people with learning disabilities varied greatly across the five local authorities, resulting in a re-distribution of funding to some floating support pilot schemes.

Furthermore, there has also been a directive from Welsh Government to move spend from fixed-term projects to floating support with a requirement for Regional Collaborative Committees to report against this in their annual review. This has not taken account of the evidence of need of the client groups.

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

Historical patterns have diminished over the years. There are some good examples of local and regional planning processes identifying evidence-based needs and ensuring that funding is diverted as necessary.

However, we strongly believe that it is also important to understand that individuals can have a range of complex needs, and can't necessarily be easily identified by their lead need alone. For example, in the Gwent region there is no specific project purely for care leavers, but care leavers are supported through several projects for young people with support needs. Furthermore, it is often the case that it can be difficult to identify the person's lead need, with many people having a range of complex needs including substance misuse, mental health issues and domestic abuse. There is a real danger in looking at primary need first and foremost as increasingly all providers are working with complex needs and there is no system currently to reflect that.