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Oddi wrth: Cymdeithas Llywodraeth Leol Cymru

From: Welsh Local Government Association

## **National Assembly for Wales' Equality, Local Government and Communities Committee - Inquiry into rough sleeping**

### **Views on the Welsh Government's Rough Sleeping Action Plan and Housing First – National Principles and Guidance for Wales**

1. The Welsh Local Government Association (WLGA) represents the 22 local authorities in Wales, and the three national park authorities, and the three fire and rescue authorities are associate members.
2. The WLGA is a politically led cross-party organisation, with the leaders from all local authorities determining policy through the Executive Board and the wider WLGA Council. The WLGA also appoints senior members as Spokespersons and Deputy Spokespersons to provide a national lead on policy matters on behalf of local government.
3. The WLGA works closely with and is often advised by professional advisors and professional associations from local government, however, the WLGA is the representative body for local government and provides the collective, political voice of local government in Wales.
4. This is the WLGA's submission to the National Assembly for Wales' Equality, Local Government and Communities Committee following the request for views on the Welsh Government's Rough Sleeping Action Plan and Housing First – National Principles and Guidance for Wales.

### **Rough Sleepers Action Plan**

5. The WLGA supports the rough sleepers action plan and shares the Welsh Government's determination to reduce rough sleeping and ultimately end the need for people to sleep rough in Wales. Achievement of these overall aims will require concerted efforts, and a multi-sectoral and multi-functional response, reflecting the many different causal factors in rough sleeping.
6. To take the action plan forward, it is agreed that the actions identified are primarily the responsibility of front line services, however, it is also acknowledged

that Welsh Government leadership is required. We would want to see progress on the action plan reported not just to the Minister for Housing and Regeneration and the working groups identified, but also to local authority Cabinet Members, who have local leadership responsibilities.

7. The Welsh Government's commitment to support the action plan with funding is welcomed, and while the plan does not identify specific resources against each action, it would be useful if there could be a clearer statement that the resources required to deliver the actions will not be only from Welsh Government and local authorities, but will require the resources of other organisations to achieve the planning and delivery of the action plan's objectives e.g. housing, healthcare employment, third sector and support service providers.
8. Similarly, the action plan would be improved by including a clear indication of the anticipated lead responsibility for taking forward or ensuring the delivery of each of the activities, wherever possible. A SMART approach to the identified actions would be helpful. This will assist with the development of localised planning in support of the overall action plan by clarifying individual or shared responsibilities, and will assist in ensuring that there is involvement and commitment from the necessarily broad range of local partner organisations and functions.
9. While accepting that it is appropriate that the action plan is seen as being a dynamic working document subject to continuous review, a number of the timescales identified within the action plan are likely to be very challenging to deliver in every local area. For example, we would suggest that the timescale for action 13 (Encourage the application of Housing First principles.....etc.) would be more appropriately identified as "ongoing" rather than "By October 2018".
10. We would suggest that Funding Flexibility pathfinders being introduced from 2018-19 in a number of local authority areas provides an opportunity to assist in developing a more joined up approach to the planning, resourcing and delivery of many of the plan's actions at a local level and these opportunities should be maximised.
11. Whilst the plan acknowledges that employment and welfare benefit problems create a very difficult context for people on low incomes, it is notable that there is no reference within the action plan to any possible role for DWP in seeking assist individual rough sleepers, prevent rough sleeping generally, or to contribute to the overall objectives of the action plan. We would suggest that

there is an important local role for DWP partners in delivering the short and long term objectives of the action plan.

### **Housing First – National Principles and Guidance for Wales**

12. The WLGA supports the development and implementation of Housing First across Wales, and endorses the core principles as set out in the document and adopted by FEANTSA. It is agreed that Housing First has an important role to play in tackling longer term rough sleeping for those who have not been successfully supported by pre-existing services and approaches. In this context, the national principles and guidance provides a useful summary of the position and progress, to-date, and for the way ahead in developing successful Housing First approaches in Wales.
13. The challenges in further developing Housing First in Wales are likely to come in the local development of projects and changes required of existing service delivery models in order to deliver on these principles. In this context, sharing experience of the achievements and challenges of the various existing and new projects based on Housing First approaches will be invaluable.
14. The articulation of the principles into a set of key features is useful in beginning to identify some of the likely challenges to be resolved in the development of appropriate Housing First projects. In particular, securing the participation of a full range of housing providers, in private and social sectors, in order to deliver a supply of good quality, suitable, affordable housing and the engagement of statutory services in committing to supporting tailored individual support/care arrangements which have proven to be critical to the success of Housing First approaches elsewhere.
15. These key features demonstrate that many of the critical contributions to successful outcomes for those being supported by a Housing First approach rely on the engagement and involvement of a wider range of key partners than housing and support providers. While highlighting the importance of engaging broader health and substance misuse services as key features of a successful Housing First approach, the guidance should also clearly signal the key role to be delivered by Mental Health service provision.
16. In addition, it would be useful for some recognition within the guidance that, despite the provision of intensive and individually-tailored support, there will be some circumstances where an approach to managing issues such as

neighbour disputes, anti social behaviour or rent arrears is required. To assist with ensuring a coherent approach across Wales, it would be helpful if the guidance could provide a clear steer on the expected approaches to housing management, perhaps drawing on international experience, which will best manage these tensions and support the achievement of the best outcomes for those being supported by Housing First and the other stakeholders, including accommodation and support providers.

17. In developing the forthcoming Statutory Guidance, it will be important that there is opportunity for wide and meaningful engagement and consultation with all stakeholders as a means to raise awareness and understanding of Housing First, especially among those organisations and sectors who may not yet have had the opportunity to develop an understanding of the benefits of Housing First and the role that they may have to play locally or nationally.