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From: Wales Community Rehabilitation Company

**Wales Community Rehabilitation Company ( Wales CRC ) response to Welsh Government Rough Sleeping Action Plan .**

Wales Community Rehabilitation Company (Wales CRC ) was formed on 1 June 2014 as part of the government's reform of probation services. We provide rehabilitation and offender management services to around 10,000 low and medium risk offenders in Wales. We work with those sentenced by the Courts to Community Orders and those released from prison under licence supervision. Following legislative change in 2014 almost all prisoners sentenced to more than one days imprisonment are subject to licence supervision for 12 months. Previously supervision was only for those sentenced to over 12 months imprisonment.

Wales CRC welcomes this opportunity to comment on the Welsh Government Rough Sleepers Action Plan.

We have also had the opportunity to provide a written and oral submission, to the Equality, Local Government and Communities Committee Inquiry into Rough Sleeping.

We recognise the concerns of Welsh Government in the rise in rough sleepers. A snap shot of homelessness among our service users found 88 who identified themselves as rough sleepers from 635 who identified as homeless on a data capture on 31/01/2018. We have canvassed our offender managers across Wales, and spoken to our accommodation advice workers, some of whom have worked for a significant period in the same geographical areas. They report a rise in rough sleepers although we do not have precise data to confirm this. In their view this rise is most marked in the past 12-18 months.

There are a group of service users who can be described as entrenched rough sleepers. In our experience they commonly have complex support needs, including substance misuse, mental health problems and health issues. Their needs may not be supported due to limited or no access to services such as GPs or CPNs. We recognise that this group may include those who are hard to reach and who may have exhausted all other options of support.

In addition service users end up rough sleeping due to a change in circumstances, the breakdown of existing accommodation or due to additional barriers. An example from Dyfed Powys area which illustrates this is of a male service user who had stable accommodation but lost it when he was remanded in prison for 7 months as a result of housing benefit being limited to a maximum of 6 months. He was sentenced to a Community Order and lived initially with his mother. Unfortunately this arrangement broke down. He had nowhere to go and informed his offender manager that he was 'sleeping under a bridge'. He attended the Homelessness Persons Unit in Llanelli but was told that he was not eligible for emergency accommodation told us he had ended up sleeping in McDonald's toilet floor.

While some areas, notably Cardiff, are well served with emergency accommodation, in other areas it is insufficient, unsuitable or does not exist. In some areas this accommodation is only available during the winter months, often provided by local Churches or charities. There are barriers to access, for example, in Newport where the Night Shelter offers a first come first served service and moves every night to a different location. Keeping track of this is difficult for service users who already have

a very chaotic lifestyle and possibly face additional barriers such as substance misuse. There are some areas, such as Blaenau Gwent, Torfaen and rural areas where there is none.

Although Wales CRC have no statutory duty to provide accommodation services, we recognise the link between accessing and sustaining suitable and safe accommodation and desistance from offending. Our Through the Gate work in custody, which starts on entry to custody and is continued in the last 12 weeks before release, includes early identification of accommodation needs and liaison with community based offender managers and local authority housing services in line with the National Pathway for Homelessness Services to Children, Young People and Adults Leaving the Secure Estate. We also commission an accommodation support and advice service from Justice Cymru, a pan Wales consortium of expert advisers who provide bespoke provision and support through direct delivery, utilising their extensive network of community partners. We are committed to working in partnership with agencies to address the accommodation needs of our service users, including rough sleepers.

### **Rough Sleeping Action Plan 2018 – 2010**

#### Prevention

We support the proposal to promote early identification of those at risk of rough sleeping and would wish to work together to ensure routes to services are widely known among our prison based Through the Gate staff and our community based offender managers.

We welcome the recognition of the need to provide emergency housing arrangements. This would benefit our prison leavers and those supervised in the community who have complex needs and limited family or friendship support. The benefits increase if such accommodation is available over a wider geographical area than at present. In our view the removal of automatic priority need for men and women leaving prison has impacted significantly on their access to accommodation. The application of priority need has not resulted in prison leavers being assessed as vulnerable and are therefore not able to access accommodation so may be more reliant on emergency accommodation.

#### Support

We welcome the acknowledgement that rough sleepers often have multiple and complex needs which can present as additional barriers to accessing services. Our offender managers work in partnership with outreach services to identify service users who require bespoke support. There are many examples of our offender managers providing practical help for service users themselves such as warm clothing, toiletries and food.

#### Outreach

For those cases where emergency accommodation is not available, the provision of outreach services, including food, warm clothing / bedding and also access to showers is critical in terms of basic humanity but also in terms of engagement and assisting the rough sleeper to access accommodation at a later stage. Our offender managers have commented on the reality that, if a person is unable to wash, that person is unlikely to be able to access support and accommodation. Provision of outreach support appears geographically patchy. Access to GPs, and substance support services are also a key element of the required outreach package of support.

#### Emergency Accommodation

In addition to the comments above, emergency accommodation, as well as geographical variation and paucity in some areas, is in some areas weather dependent. The apparent increase in rough

sleepers has not necessarily been matched with an increase in provision. While not all apparently homeless people on the streets are actually homeless, we recognise a picture of increasing homelessness and rough sleeping amongst our service users which includes some of the most alienated and vulnerable citizens in Wales. We would therefore welcome the consideration to amend secondary legislation to modify priority need groups, including rough sleepers and which also may include persons released from prison .

#### Joint Working

We are committed to continuing to work in partnership with Welsh Government and other agencies to overcome barriers for service users. As a previous member of the Prisoner Accommodation Resettlement Working Group (PARWG) we would welcome the reformation of this group as a vehicle for working together .

## Additional Information

On reception into custody, all men and women receive a Basic Custody Screening 2 (BCST 2). Contractually, we must complete this with the first 5 days and since contract implementation we have never dropped below our performance target of 95% completions.

Part of this assessment includes a discussion around housing and what the particular housing needs might be.

In 2017, the Resettlement Team completed over 3965 BCST 2 in HMP Cardiff, and of those over 1401 identified a housing need at that initial assessment. In HMP Swansea the Resettlement Team completed over 2195 BCST 2 of which over 578 identified a housing need at that point in time.

We find that the majority of men/women entering custody have a housing need that falls in to one of the following categories:

1. Person was NFA before entering custody and needs to secure housing for release
2. Person is unsure about whether they can return to previous property, or their sentence prevents them from returning to previous property and needs to secure alternative housing for release
3. Person had a property/tenancy which can be retained under the new Wales Housing Legislation due to short sentence
4. Person had a property/tenancy which needs to be closed down due to long sentence and will need to secure another property for release

If somebody falls into category 2 or 3, they will have a referral to Prison Link Cymru which is present and operating in all prisons. Prison Link Cymru will provide support to either retain or close down a tenancy depending on the needs of the person. If somebody needs to source new accommodation a housing app will be made to the relevant local authority area as soon as *the resettlement team are made aware of the need*. The housing app will be sent to both the Local Housing Authority as well as the Offender Manager so that they can provide the risk information.

Due to the average length of sentence in our local prisons (HMP Cardiff and HMP Swansea), we usually have less than 12 weeks to work with somebody before they are released, so housing apps are sent to the local authority areas less than 12 weeks as opposed to the 12 week mark or sooner. The average length of sentence in the South Wales Public Sector Prisons is:

HMP Cardiff:	12 weeks
HMP Swansea:	12 weeks
HMP Prescoed:	156 weeks

Another common factor is that the resettlement team aren't made aware of the housing need until the final pre-release review. Every man/women leaving custody has a review approximately 7 days prior to release, the resettlement team will update the plan which will be handed to the Offender Manager to pick up on release. It is often at this point in which a housing need is identified where it wasn't before. This is often due to:

1. A change in circumstance. The person is unable to return to the property they initially stated during their first assessment when coming into custody. For example, a relationship may have broken down and the person can no longer return to the family home.

2. The accommodation the person stated they could return to has been deemed unsuitable by the Offender Manager.
3. The person did not disclose an accommodation need during the initial assessment and has only voiced it during the final interview.

All of these circumstances will result in a last minute referral to the local housing authority in their area of release. As the housing need is based on self-reported information from the person in custody we are reliant on timely and accurate upon which we can act.

Further challenges that the resettlement team face come from Local Authority Housing requesting the finite detail to identify whether there is a duty to house the Service User, for example, medical information on illness/disability etc. At a recent training event lead by Joy Williams it was stated that this type of work should be completed by the Local Authority as opposed to the Resettlement Team, as they are not resourced to complete this work and have difficulty extracting this level of information from prison healthcare departments.