

About Cymorth Cymru:	
<p>Cymorth Cymru is the umbrella body for providers of homelessness and housing related support services in Wales. Cymorth Cymru acts as the ‘voice of the sector’, influencing the development and implementation of policy that affects our members and the people they support. We work in partnership with members and other stakeholders to prevent and reduce homelessness and improve the quality of life for people who are marginalised or at risk of housing crisis across Wales.</p> <p>Cymorth has approximately 100 members across Wales, made up of third sector organisations, housing associations and local authorities. Our members work with a wide range of people, including people who are homeless, or at risk of homelessness; families fleeing domestic abuse; people dealing with mental or physical health problems; people with learning disabilities; people with alcohol or drug problems; refugees and people seeking asylum; care leavers and other vulnerable young people; and older people in need of support.</p>	

Cymorth Cymru welcomes the opportunity to respond to this consultation. Our role as the umbrella body for homelessness and housing support providers gives us a valuable perspective on the challenges experienced by a diverse range of people and support providers across Wales.

There are specific points that we want to make in this response to the Committee, some which respond to the Rough Sleeping Action Plan, and others which are observations on developments across the housing sector since the Committee's report.

1. The scale of rough sleeping

- 1.1. It is difficult to accurately identify the number of people sleeping rough in Wales. While many people are visible on the streets of our towns and cities, others are hidden from view or located across vast rural areas which are more difficult to monitor. However, the Welsh Government, local authorities and a number of other organisations co-ordinate or record data which helps us to assess the scale and emerging trends.
- 1.2. The latest annual National Rough Sleeping Count¹ took place in October 2018. During the 2 week count a total of 347 people were estimated to be sleeping rough across Wales, which is an increase of less than 1% compared with the previous year. 158 individuals were observed sleeping rough across Wales during the single night count, which was a decrease of 16% on the previous year. However, it is important to note that heavy rain and flooding affected some areas on the night of the count, which may have had an impact on data collection.
- 1.3. While the official count did not evidence a large increase in rough sleeping, it is clear that the numbers are still far too high. It should also be noted that the number of people sleeping rough during the single night count in 2018 remains higher than the figure recorded in 2016. In addition, many of our members who work directly with people who are homeless and sleeping rough believe that there continues to be an increase in rough sleeping. The statistics collected by The Wallich Rough Sleeper Intervention teams show an upwards trend across several areas in Wales. The number of rough sleepers engaging with the Huggard's Day Centre has also increased since 2017.
- 1.4. There should be no rough sleeping in Wales. It results in people being at risk of violence and abuse, poorer health outcomes and a much lower life expectancy. It is critical that we do all we can to end rough sleeping in Wales.

2. National Rough Sleeper Count Questionnaires 2018

- 2.1. A useful report² has been produced by the local authority Housing Networks Project following the completion of over 300 questionnaires by people who were rough sleeping across Wales. We recommend that Committee members read the report, as it reveals more information about the demographics of the people surveyed, as well as the reasons they gave for becoming homeless. The vast majority, 86% of respondents, stated that they would like help to stop sleeping rough.
- 2.2. It is concerning that a high proportion of people had been sleeping rough for a number of weeks (26%), months (30%) and years (10%). Rough sleeping should not be taking place at all in 21st century Wales, and people should certainly not be sleeping rough for weeks, months or years at a time. People who have been sleeping rough for this amount of time

¹ <https://gov.wales/docs/statistics/2019/190205-national-rough-sleeper-count-november-2018-en.pdf>

² <https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=2182>

have clearly been let down by the system. It is important that appropriate evidence-based services such as assertive outreach and Housing First schemes are developed to support people to move off the streets and into secure, sustainable accommodation with the support they need to manage their tenancy.

- 2.3. Mental health problems have featured in many of our conversations with people who use and provide services and this issue is prominent within the Housing Networks Project report. 182 respondents (54%) disclosed that they have a mental health issue and there has been an increase in the number of people who cite mental health as the reason for them sleeping rough:
 - 20 people said 'mental health; was the reason for them 'sleeping rough this time', compared to 1 person the previous year.
 - 19 people said 'mental health issues' was the initial reason for becoming homeless, compared to 3 the previous year.
 - 29 people said 'substance misuse' was the reason for them 'sleeping rough this time' compared to 4 people the previous year.
- 2.4. It is concerning to see increases in the numbers of people who started sleeping rough or lost their accommodation because of their mental health or substance misuse problems. It could be that these issues were under-reported in previous surveys, and this year's data is simply a more accurate account of the reasons people became homeless. However, it could also indicate that people have found it more difficult to access the support they need for their mental health and/or substance misuse issues, and this has led them to reaching crisis point and sleeping rough. It also poses the question of whether vulnerabilities such as mental health problems have been appropriately considered when local authorities have been assessing whether people qualify as priority need for housing.
- 2.5. It is also concerning that 123 individuals (37%) questioned reported that they had been discharged from hospital to no fixed abode compared to 66 individuals (20%) in 2017.
- 2.6. An area of concern is the impact of the change to priority need for prison leavers, which came into force with the Housing (Wales) Act. The Housing Networks Project report states that 43% of people who responded to the survey had previously been in custody. Although the number of people citing 'release from prison' as the reason for sleeping rough has decreased from 45 in 2017 to 37 in 2018, the number of people who have ended up on the streets following their time in prison is concerning.
- 2.7. We support calls for the Welsh Government to re-instate automatic priority need for people leaving prison, when the legislative opportunity becomes available. In the meantime, Welsh Ministers, the Ministry of Justice and other partners should continue to address the findings and recommendations of the *Evaluation of homelessness services to adults in the secure estate*³.

3. Structural causes of homelessness and rough sleeping

- 3.1. Welfare reform and the lack of truly affordable housing are two major structural causes of homelessness.
- 3.2. The Welsh Government has provided a much more favourable environment for housing associations in Wales compared to the situation in England. However, the pace of development has not kept up with the needs of the population, and the Welsh Government must support and fund the development of much more social housing over the coming years.

³ <https://gov.wales/docs/caecd/research/2018/180627-evaluation-homelessness-services-adults-secure-estate-en.pdf>

- 3.3. Research conducted on behalf of Crisis estimated that Wales needs to build 4,000 houses at social rent each year for the next 15 years to meet the needs of people experiencing or at risk of homelessness. Community Housing Cymru has outlined the ambition of housing associations in Wales to deliver 75,000 homes by 2036. However, if these are to be truly affordable then housing associations need assurances about the continued availability of Social Housing Grant, at appropriate levels, to enable them to translate this ambition into reality.
- 3.4. The Affordable Housing Review offers an opportunity to address this issue but Ministers must ensure that government funding is targeted at the provision of social housing for people on the lowest incomes.
- 3.5. Welfare reform continues to be a huge problem for many of the people our members support. Too many people face delays in receiving their payments or their assessment fails to appropriately recognise the impact of their disability or health problem. The pressure builds on people and their families and increases the risk of homelessness.
- 3.6. While we would like the UK Government to re-think their welfare policies and end delays to people's payments, we welcome the First Minister's recent statement that the Welsh Government should 'explore the devolution of administration'. We are acutely aware of the risks associated with this, not least the possibility that Wales could be short-changed by the UK Government in the transfer of responsibilities and funding. However, Scotland has demonstrated that it is possible to take a more compassionate approach to the administration of welfare. This has the potential to make the difference between someone ending up sleeping rough or not – and should therefore be seriously considered by government and opposition parties.

4. Funding for homelessness and housing-related support services

- 4.1. When we gave evidence to the Committee during its original inquiry into rough sleeping, we were facing an unprecedented threat to the future funding of homelessness and housing-related support services in Wales. We were very grateful for the Committee's scrutiny of this issue and members' work to highlight their concerns with the Welsh Government's proposals for a super grant that would merge seven non-housing grants with three housing grants.
- 4.2. We were delighted that the Welsh Government decided to change course and opted instead to create a new Housing Support Grant, which brings together Supporting People Programme funding and Homelessness Prevention funding. We now have a commitment that this funding will be ring-fenced for the remainder of this Assembly term. However, this equates to just two years, which hardly gives the sector the stability it needs to plan services and retain experienced and skilled staff. Politicians from all parties recognised the importance of these services over recent years and championed the need to retain a ring-fence around this funding. We urge all political parties to make a commitment to retaining this ring-fence beyond the next election, regardless of who forms the next Welsh Government.
- 4.3. A consistent message from people who commission and deliver homelessness and housing-related support services is the need to move beyond one-year funding allocations. The Wales Audit Office report on the Supporting People Programme⁴ (published August 2017) recommended that the Welsh Government re-introduce indicative three-year Supporting People funding allocations at the earliest opportunity to assist local authorities in their planning. This has been echoed in recent engagement events about the development of the new Housing Support Grant.

⁴ <http://www.audit.wales/system/files/publications/Supporting-People-2017-English.pdf>

4.4. We have welcomed additional funding for homelessness and rough sleeping, but urge the Welsh Government to make longer term commitments to additional funding. While in-year funding can be helpful for pilot projects, it is difficult for local authorities, landlords and support providers to plan strategically due to its short term nature. While we appreciate the constraints on the Welsh Government due to uncertainty surrounding the Welsh block grant, a sustained effort will be required to reduce homelessness and end rough sleeping - and this surely requires a longer term commitment to funding.

5. Experts by experience

5.1. Listening to the views and experiences of people who use services is crucial in any response to homelessness and rough sleeping. In January 2019 we held three events in Carmarthen, Rhyl and Cardiff and invited people who have used homelessness and housing-related support services to share their views and experiences. We also created an online survey to enable people to participate if they couldn't attend the events.

5.2. Approximately 100 people attended the events and over 80 people responded to the survey. We are currently analysing the responses, and will be happy to share the final report with the committee once it has been published. However, some of the themes emerging from the engagement exercise are:

- The importance of building trust and treating people with respect and compassion, and being non-judgemental when delivering services to people who are homeless.
- The importance of holistic, person-centred support, which addresses all of the factors that contribute to homelessness and housing instability, such as mental health, finances, relationships, education, training and work,
- The need for more support for substance misuse problems, including specialist accommodation schemes for people at different stages in the recovery.
- The need to improve access to mental health services and therapeutic support.
- The negative impact of arbitrary time limits on support, and the need for support to be flexible as people's needs and engagement changes.
- The need to increase awareness of homelessness and housing-related support services among the public and in other sectors – so that people know where to go if they need help.
- The lack of affordable housing, particularly for young single people, and the difficulties accessing move-on accommodation following time in supported accommodation.
- The need for continuity and retaining staff within support services.

5.3. The views of the people who participated in the events and the survey will be shared with the Welsh Government as they continue to develop the new Housing Support Grant.

6. Development of psychologically-informed approaches

6.1. Last year (2017/18), Cymorth Cymru, alongside the Housing Networks, the WLGA, and the ACE Support Hub, developed and delivered Welsh Government-funded PATH training to over 1100 practitioners across the housing sector in Wales. PATH training is a housing-focused programme of training that increases understanding of adverse childhood experiences and trauma on people's lives and encourages the use of psychologically informed environments.

- 6.2. Research shows that most people who experience homelessness have experienced trauma in their early life⁵, which means that it is essential our services and systems are set up to respond effectively to that reality. Psychologically-informed approaches are essential to the prevention of homelessness and to effectively engaging with people who are experiencing long-term entrenched rough sleeping. For those individuals, whose common responses are that the system is failing them⁶, a new way of working is needed, and trauma-informed practice is part of that new way of working.
- 6.3. The programme is aimed at third sector homelessness and housing-related support providers, housing associations and local authority housing, homelessness and Supporting People teams. One of the training courses is aimed at frontline staff and team leaders, with another course targeted at leaders and commissioners across the sector, recognising that we need strategic buy-in to embed this approach.
- 6.4. The independent evaluation of the programme⁷ was extremely positive and we have received feedback about how services have started to incorporate psychologically informed approaches within their services. One cited an example of how they are working differently in relation to warning and eviction processes.
- 6.5. Another service has described the impact of embedding a psychologically informed approach following a number of staff attending the PATH Training. Within the first 3 months they reported a 30% reduction in the number of incidents, a 33% reduction in incidents of violence and self-harm, a 37.5% reduction in intervention involving ambulance / hospital services and a 84% reduction in police intervention. While these are early indicators, and the pattern may well fluctuate over time, this is very positive.
- 6.6. A second tranche of PATH training is nearing conclusion, expecting to be finished at the end of March 2019, with another 650 practitioners expected to have been trained. We hope to continue our work to support organisations to embed this approach throughout their services, with the aim of reducing homelessness supporting more people with experience of trauma to live independent and fulfilled lives.

7. Development of Housing First across Wales

- 7.1. The importance of adopting a Housing First approach has been given much more attention across Wales. It is an internationally evaluated model, and the research demonstrates beyond doubt that it works, with examples from Finland, for example, achieving a reduction in long-term homelessness of 1,200. The model, as delivered in Finland, was described in an international evaluation⁸ as follows:

“In the view of the evaluation team, the Finnish programme to reduce long-term homelessness is one of the best examples in the world with regard to the functionality of the Housing First model in work to reduce long-term homelessness.”

- 7.2. Since the initial inquiry, the Welsh Government work on Housing First has continued at pace, and Cymorth Cymru has been significantly involved in this work. We organise and provide the secretariat for Wales’ Housing First Network, which is a cross-sector group of providers, housing associations, local authorities and other interested parties such as HMPPS, health representatives, and social services commissioners.

⁵ <https://www.feantsa.org/download/winter-2017-trauma-and-homelessness2297258390271124817.pdf>

⁶ <https://sheltercymru.org.uk/what-we-do/policy-and-research/trapped-on-the-streets-understanding-rough-sleeping-in-wales/>

⁷ Available upon request.

⁸ https://helda.helsinki.fi/bitstream/handle/10138/153258/YMra_3en_2015.pdf?sequence=5

- 7.3. The initial steps taken by this network were to create a series of principles for widespread adoption across Wales. This was the first step taken by the network, because Housing First effectiveness is linked significantly, across the international evaluations, to the extent to which the projects show “fidelity” to the model. There was a real risk that Housing First projects could end up being delivered which are not as effective as they would be if they followed the set principles.
- 7.4. These principles⁹ were co-produced by the network, which amended and added to the principles developed by Homeless Link, ensuring that the latest research and understanding was incorporated into the Welsh principles. These principles are now a key part of the Welsh Government trailblazer funding, and the network is committed to raising awareness of these principles for projects that are delivered outside of that funding mechanism.
- 7.5. In terms of Housing First, it is important for the Committee to be aware that although it is an extremely effective solution, it is not a *quick* solution. The Welsh Government should be fully commended for pushing ahead with this agenda. However, for the model to be delivered effectively, and at scale, without compromising the fidelity and integrity of the model, care must be taken that it is delivered in a gradual, incremental way. This will of course be frustrating for the Committee, who will no doubt want to see a rapid reduction in the numbers of people sleeping rough, but we must be extremely clear that the work to support someone off the streets is extremely complex and cannot be rushed. It is also critical that services such as health, particularly mental health and substance misuse, are fully committed to the delivery of Housing First, as this model will not be successful without their full co-operation.

8. Development of assertive outreach services across Wales

- 8.1. One of the foundations of any effort to address the crisis in rough sleeping, is the need to adopt an assertive outreach approach. Assertive Outreach is a particular form of street outreach that targets the most disengaged rough sleepers with chronic support needs and seeks to end their homelessness through persistent, purposeful, pro-active, multi-disciplinary support. This is an area that services across Wales are already engaging in, as it is not a new way of working, having been first adopted in the late 90s¹⁰. It is identified as an effective way of addressing long-term entrenched rough sleeping.
- 8.2. Cymorth Cymru has been working with stakeholder across the homelessness sector to develop a series of principles for assertive outreach for Wales, on a similar basis to the Housing First principles referenced above. Because this work is widespread already, the principles will be drawn much more broadly, to ensure as much consistency as possible whilst allowing for differences in service delivery. Early findings from the focus groups and initial suggestions for principles have been shared with the Welsh Government homelessness team, in time for them to come to the Committee, with a final version to be published later in March 2019.

9. Public attitudes and political responses to rough sleeping

- 9.1. One key concern we have about public and political responses towards people sleeping rough, is the public discourse which suggests that rough sleeping is a choice, that police should forcibly move people on, that tents should be torn down, and individuals ‘forced’ to

⁹ Available on request.

¹⁰ https://www.crisis.org.uk/media/238368/ending_rough_sleeping_what_works_2017.pdf

engage with services. We cannot caution against this approach strongly enough. At *best*, the results from these approaches will be short-lived, as research demonstrates that individuals who choose to engage are more likely to maintain their tenancies. At *worst*, it reinforces and further builds on the narrative that rough sleepers are second class citizens to be addressed with ever more punitive approaches.

- 9.2. We urge the Welsh Government, and policymakers in all parties, to resist this approach and instead adopt a more compassionate, trauma informed approach and advocate for evidence based interventions as described above.

10. Development of emergency accommodation across Wales

- 10.1. Since the Committee's report, Cymorth Cymru acting in its role as secretariat for Rough Sleepers Cymru, has guided and facilitated work on emergency accommodation. The first step was to ensure there is a consistent definition of emergency accommodation. This was produced in consultation with Rough Sleepers Cymru, by the Local Authority Housing Networks Project, and was used in the latest Rough Sleeper Count, to ensure that local authority returns are accurately reporting the availability for emergency accommodation.
- 10.2. Work is ongoing, through Cymorth Cymru, to establish a series of principles for what people sleeping rough can expect from emergency accommodation, which was a piece of work suggested by Rough Sleepers Cymru, to address the perception amongst some people about the safety or suitability of emergency accommodation. The aim is for this work to inform the delivery and commissioning of emergency accommodation.
- 10.3. Furthermore, Rough Sleepers Cymru has completed a review of all 22 local authority inclement weather plans, suggesting clear improvements whilst recognising the good practice evident in all the policies. This has already resulted in some local authorities amending and making improvements to their plans. A key theme that arose in all local authority plans was the need to count extreme heat as inclement weather, as much as extreme cold, as the heatwave in summer 2018 was a difficult time for many rough sleepers, but without the same level of public sympathy as is seen during the colder periods.
- 10.4. Emergency accommodation is an area of the housing sector that needs significant attention. Those providers that delivered these services are excellent and committed practitioners, who work with some of the most vulnerable people in Wales. We strongly believe that they need to be given increased resources to be able to provide the support they need to long-term rough sleepers.
- 10.5. It is also important that emergency and temporary accommodation is exactly that, and does not become a long term solution for people. This type of accommodation is not designed to be permanent and is often communal. It should be regarded as a temporary respite from the streets while more secure and sustainable accommodation is secured. However, too many people are unable to find affordable move-on accommodation with the support they need to support their recovery and live independently. This has to change to prevent emergency accommodation from becoming the norm for people who are homeless.

11. Development of monitoring systems for rough sleepers across Wales

- 11.1. An exciting project supported by the Welsh Government is the Street Homeless Information Network (SHIN), administered by The Wallich. This system, modelled on the successful CHAIN system in place in London, aims to create a robust and live system that can accurately monitor the numbers of people sleeping rough at any one time. This has been a

significant missing piece of the jigsaw in policymaking that aims to address rough sleeping, and the fact that the Welsh Government has given this project its support bodes well for the eventual creation of this database.

- 11.2. Once we have the ability to monitor the numbers of people sleeping rough, policymakers at all levels will be able to make robust policy decisions based on real, verifiable data, rather than the current rough sleeper count, which has long been described as not fit for purpose (albeit, currently, the only mechanism we have to count). We urge the Committee to show support for this project, and the impact it could have on rough sleeping policy interventions.

12. The involvement and commitment of health services

- 12.1. The Welsh Government accepted the ELGC Committee's recommendation that the Health Secretary should take joint responsibility for delivering the Rough Sleeping Action Plan. This is welcome and is absolutely necessary if we are to make progress in a number of areas relating to rough sleeping. Working to help a rough sleeper into accommodation can easily stall if access to health services is delayed by lengthy waiting lists. Meaningful health involvement at a strategic level and a commitment to ensure swift access to health services is crucial if Housing First is to be a success. Collaboration with homelessness and housing related support services is also essential to addressing the health inequalities and shorter life expectancy experienced by rough sleepers. Some excellent examples of collaboration exist in some areas but often seems to be dependent on specific relationships between committed professionals, rather than something that is embedded across the system.
- 12.2. We recommend that the Minister for Health and Social Services, alongside the Minister for Housing and Local Government, takes action to encourage more systematic engagement from health services to end rough sleeping. Examples of where this approach is needed are manifold but are particularly prevalent in the interactions between homelessness services and mental health, substance misuse or emergency services. Having a common framework for all Health Boards to work towards in partnership with local authorities and housing partners is vital. There needs to be a widespread national understanding across Wales, that people sleeping rough need priority access to health services, to enable rough sleeping to be eradicated. Nothing short of clear political leadership will be enough to make this happen in a consistent and cohesive way across Wales.

13. Co-production and partnership working

- 13.1. Finally, we cannot emphasise enough the importance of meaningful collaboration and co-production in the sector's work to tackle homelessness in general and rough sleeping in particular. Funding is scarce and there is huge pressure on local authorities and support providers to deliver more for less. However, it is imperative that all stakeholders show leadership and work to build trusting relationships with those who are committed to ending rough sleeping. It is important that local authorities recognise the skills, expertise and experience that have been built up within the third sector, as well as their ability to innovate and draw in additional funding from charitable sources.