

Draft Ten-year Homelessness Plan

A consultation response from Cymorth Cymru

23rd February 2009

Cymorth Cymru is the representative body for housing-related support, care and homelessness providers in Wales and as such has two overarching objectives:

- To improve the links between policy and practice by ensuring that those working in frontline service delivery understand the wider policy context, and those working in policy development understand and are influenced by the experiences and knowledge of those working on the ground
- To ensure that the housing-related support sector maximises its contribution to the lives of service users and the communities in which they live, by helping to build and develop the sector's capacity and professionalism

1 Introduction

Cymorth Cymru welcomes the Welsh Assembly Government's draft Ten-year Homelessness Plan and the commitment it represents to developing further Wales's support to people who are experiencing or at risk of homelessness.

This response has been formulated in consultation with our membership.

2 General comments

Cymorth members broadly welcome the ‘thrust’ and aspirations of the Plan, though concerns have been expressed about both the limited detail and specific activity that it describes. To this extent, some have questioned the title of the current document, though it is hoped that the forthcoming Action Plan will provide the detail necessary to drive the agenda forward.

Members suggest that to be effective as a 10-year document the Plan needs to:

- present a developed and practical vision of where homelessness policy and services will be in ten years’ time
- provide firmer leadership with regards to WAG objectives, expectations and commitments towards achieving this vision

Regarding the overarching vision described in the draft, there is wide agreement among housing-related support providers that the recent focus on homelessness prevention must be maintained, together with the hope that homelessness will in future be reduced to a minimum. However, it is also felt that the vision should include a determination that periods of homelessness which continue to be experienced should be as brief as possible, and be associated with minimum trauma or risk of long-term harm to individuals or families.

Central leadership from the Assembly Government will be essential in delivering this vision. Complimenting local authorities’ strategic functions in the delivery of homelessness and housing services, the national plan must ensure the provision of all required services. For example, the successful administration of Supporting People Revenue Grant by the Welsh Assembly Government has, in our view, been instrumental to the success of the programme and the widening availability of high quality homelessness services in Wales.

A further point concerns the format of the document and reflects the view that although the draft plan covers many important subjects and themes, it may not clearly identify where key *priorities* might lie – that is, many areas appear to be afforded ‘equal status’. Similarly, all but one of the Strategic Aims listed describe ‘generic’ principles which pertain to good practice in the delivery of many areas of social policy, and do not describe clear, practical intentions with regards to homelessness policy in Wales. As a *plan*, it is felt that a great deal more specificity is required.

It is suggested that the Plan should identify a small number of key objectives (each directly pertaining to the overarching vision), and that the document be structured around them. For example:

- Achieving universal access to high quality homelessness services across all parts of Wales
- Strengthening strategic and service delivery links between homelessness, health, social services and other associated sectors
- Reviewing and reforming the legal framework

Objectives must be measurable and, where appropriate, attached to specific timetables.

Finally, whilst noting the recent and very positive news that Supporting People budgets are to receive an inflationary uplift over the coming three years, the lack of resource or capacity commitments in the document has been raised as a fundamental threat to the successful delivery of the plan.

3 Specific comments

3.1 Do you think that the Plan has covered the areas that need to be addressed if we are to achieve our aim of reducing homelessness? Are there any areas that you would have liked to have seen covered that are not? If so, why?

Cymorth believes that the Plan identifies many of the key issues which need to be considered for homelessness in Wales to be most effectively addressed in the longer term. Indeed, a concern expressed has been that although the Plan lists a wide range of important subject areas, it does not present a clear impression about how these will be prioritised over the coming decade, and to this extent may not describe a clear plan of action. As discussed above, we would propose that a small number of *key* objectives are identified and that actions and commitments towards the achievement of these are then described.

However, in our discussions with members a number of specific issues have arisen (each of which would sit under one or more of the proposed objectives listed above):

- 3.1.1 Resources - the draft Plan makes repeated reference to the improvement of services and the development of wider provision across a range of service types (including those funded by Supporting People, Section 180, Health and Social Housing Grants), though the only reference to funding concerns the better use of existing resources.

Whilst recognising that there may remain efficiency savings to be made, the absence of any firm, future funding commitments in the document is regrettable, and felt by some to reflect negatively on the Welsh Assembly Government's commitment to addressing homelessness. The Supporting People uplift noted above, and the certainty that it represents, has been of significant reassurance to the sector and allowed confident service planning to take place. We feel that the 10-year Plan may allow for similar benefits with regards to greater forward planning by homelessness services. The *WAG Code of Practice for Funding the Third Sector* (Jan 2009) allows for 5-7 years of secure strategic core funding, and, where appropriate, Cymorth would welcome commitments to these kinds of timescales.

A final point on the security of funding concerns the central administration of the Supporting People Revenue Grant (SPRG) and the risks associated with transferring this to local authority control. We strongly believe that the administration of SPRG directly to service providers has brought benefits to the development and security of services, particularly for those supporting 'unpopular groups' such as ex-offenders and people with drug dependencies.

The current economic climate heightens the need nationally to protect services for these groups, as, regrettably, it remains the case that homelessness and housing-related support services in Wales do not universally enjoy corporate or political support in local government. As we move into a time when competing financial and political priorities might be expected to further jeopardise corporate commitment to services for marginalised or 'excluded' groups, the retention of central control for SPRG funding will become even more critical.

- 3.1.2 Healthcare access – concern that addressing health issues (particularly access to primary healthcare, mental health services and drug/alcohol services) and the successful development and implementation of Homeless and Vulnerable Groups Health Action Plans are central to the delivery of the Homelessness Plan. This must be emphasised in the document and systems put in place to ensure that the recent work of the Health and Homelessness Facilitator (a post now discontinued) is taken forward.
- 3.1.3 Emergency provision – need to establish minimum requirements with regards to the provision and availability of emergency accommodation in Wales. This should cover, for example, the minimum number of emergency beds (including non-statutory homelessness) required throughout the year, together with plans to take account of more urgent demand during cold weather, etc, for each local authority area.

- 3.1.4 A number of organisations working with people who sleep rough (or with histories of sleeping rough) have stressed the high prevalence of problematic drug use among their service users, and the critical importance that appropriate services are available to these people. This would include low threshold substance misuse services, such as needle exchange and other community services, as well as substitute prescribing, detox and rehabilitation services. Members believe that these issues require greater prominence in the Plan.

In common with the National Public Health Service for Wales and other partners, Cymorth proposes that safer injecting facilities are piloted in those areas of Wales where there is evidence of greatest need, and that these should operate in accordance with the good practice guidance recently published by the Joseph Rountree Foundation.

Finally, the Plan must acknowledge the critical role played by many accommodation services (such as hostels) in supporting people with drug problems - providing advice, harm reduction interventions, and onward referral to specialist services.

- 3.1.5 As above, limited acknowledgement is made of the disproportionate numbers of homeless people affected by mental ill-health, and the particular support that may be required for these service users to access and maintain accommodation. This is a fundamental issue for many support providers – including mainstream homeless services and specialist mental health agencies – and this must be recognised in the 10-year Plan if adequate responses are to be developed.
- 3.1.6 Regional approaches – service providers recognise that some areas of specialist homelessness-related provision may best be provided at a regional or cross-boundary level. It would be useful for the Plan to outline how the Assembly would see this taken forward.
- 3.1.7 Focus on the role of the private sector – Cymorth is concerned that the marketplace must not be depended on as key element of Wales’s response to homelessness.
- 3.1.8 There is a need to address systemic or structural barriers to welfare benefits, particularly with regards to the experiences of people with mental health problems or other significant support needs.

For example, whilst the UK welfare reform agenda presents a number of welcome opportunities for users and providers of homelessness services in Wales – for example, through the development of enhanced services to assist people into training and employment – there are also serious

concerns about potential risks associated with some elements of the programme. In particular, providers in Wales are concerned about the *compulsory* aspect of new training opportunities and other aspects of the programme: the obligation to comply with new expectations and requirements, and the threat of benefits sanctions for those who do not fully engage. We are concerned that this will, for some, result in acute hardship or even destitution, and early evidence of homeless people dropping out of the benefits system is already beginning to emerge.

Aspects of the Local Housing Allowance system and access to Community Care Grants (particularly for people being resettled into unfurnished properties) were also raised as areas of concern.

It is fully recognised that elements of this agenda are non-devolved, but it is none-the-less believed that there is much that could be done in Wales to ensure that reform is driven forward in Wales in a way that is compatible with the priorities and approaches set out in *Making the Connections* and *One Wales*.

3.1.9 Rough sleeping estimates – Cymorth welcomed the recent ministerial decision to discontinue the requirement that local authorities in Wales conduct annual streetcounts of people sleeping rough in their areas, and notes the reference in the draft 10-year Plan to introducing continuous monitoring systems across the country. However, we believe that for this to be meaningful and provide real benefits for homeless people, there must be a *requirement* for systems of this kind to be universally adopted, and not merely an option to.

3.2.1 **Do you think that we have identified the issues and concerns associated with reducing homelessness? If not, what do you think we have missed and why do you think that this is important? Is there anything in the Plan that you do not agree with?**

There are no proposals in the plan that we would disagree with. Issues we feel may have been missed or understated are discussed under other question headings.

3.2.2 **The Welsh Assembly Government will work in partnership with a range of stakeholders, including service users, to develop an action plan which will detail what steps will be taken to achieve or aim of reducing homelessness to a minimum. What steps do you think need to be taken to reduce homelessness and why? What agency or organisation do you think should carry out these activities? Examples include the Welsh Assembly Government, local**

authorities, criminal justice agencies, health organisations, housing associations, or third sector (voluntary) organisations.

Throughout 2008 Cymorth was represented at monthly meetings of the Welsh Assembly Government's Homelessness Strategies Working Group. These meetings involved a range of homelessness service providers and membership organisations working across the statutory, private and Third Sectors, as well as Welsh Assembly Government officials from Health and Supporting People departments. Discussions examined in detail many aspects of homelessness policy and service delivery, drawing on evidence from across Wales and more widely in the UK.

These meetings generated a good deal of consensus among the group, and we would propose that many of the group's recommendations are returned to as the Action Plan is developed. We suggest that in consideration of the wider views of stakeholders this be done with reference to the findings of the current consultation exercise.

Cymorth Cymru and Rough Sleepers Cymru will continue to support the Welsh Assembly Government in developing this work.

3.2.3 The Welsh Assembly Government believes that the only way that our aim can be achieved is if everyone who works across the range of statutory, voluntary and third sector organisations, within the fields of health, social care, housing, community safety, welfare and employment, works together to complete the actions needed. Do you think that the Plan will help to ensure that everyone does play their part? What else do you think needs to be done to help improve partnership working?

In its current form the Plan notes the delivery of joined-up services as one of its strategic aims, though it does not appear to discuss details of how this may be achieved. To this extent it is unclear whether the Plan will help ensure that everyone plays their part, though we hope this may be addressed in the final Plan, and in the Action Plan which follow it.

3.3 How do you think that the success of this Plan should be measured?

The Plan in its current form has few measurable outcomes and no timetable for change over the coming ten years, so it is difficult at this stage to consider how progress may be monitored.

Cymorth Cymru is currently in discussions with its membership, the Welsh Assembly Government and partner organisations on future outcomes monitoring

in the homelessness sector. As this reflects a move nationally and locally to focussing on outcomes, we recommend that this is reflected in how the effectiveness of the 10-year Plan and forthcoming Action Plan is assessed.

With regards to the monitoring of homelessness in Wales (and measuring progress on the central aim of reducing homelessness to a minimum), we would make two observations:

- The continuous and systematic monitoring of rough sleeper levels in Wales is essential to the development of responsive services for this client group and to any meaningful review of the impact of the 10-year Plan. It must be required that all local authority areas establish and maintain an appropriate continuous monitoring system.
- Current official homelessness figures across the UK broadly take account only of *statutory* homeless people – that is, individuals and families who meet certain legal and regulatory requirements. People who fall outside this group, although substantial in number, are less well accounted for. This anomaly obscures the true picture of homelessness, renders monitoring and reviews of policy less than fully-informed, and undermines long-term planning. The draft Plan notes that the statutory homelessness framework is to be reviewed, and we would hope that these issues will inform that process.

3.4 **Are there any other comments you would like to make?**

Only to reiterate the importance of returning to the Homelessness Strategies Working Group discussions of 2008 in formulating the first Action Plan – for example, areas such as the impact of relationships between LA Homelessness departments and Children’s services on support provided to 16/17-year-olds, community relations, daycentres, outreach services, training and employment, outcomes monitoring, links with the Probation Service and supporting prison leavers, education, and many other areas were discussed in some detail. Much of this should inform the Action Plan.

4 Conclusion

Cymorth welcomes many elements of the draft 10-year Homelessness Plan, though takes the view that to fully deliver on its potential to bring lasting benefits to addressing homelessness in Wales it must present a clear vision for the future, describe key, practical objectives, and detail actions and commitments which will bring these objectives about. We do not feel that the Plan in its current form delivers on these requirements.

Cymorth is committed to supporting the Welsh Assembly Government in the development of its plans and strategies to address homelessness and other areas of social policy, and looks forward to representing to views and experiences of its members as the forthcoming Homelessness Action Plan is developed.

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