Cymorth Cymru consultation response

Welsh Government consultation
Housing Adaptation Service Standards

About Cymorth Cymru:
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. 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.

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Cymorth Cymru welcomes the opportunity to respond to this consultation. We are confident that the proposed service standards are robust.

Cymorth Cymru welcomes the chance to respond to this consultation, and overall we are pleased that this document provides more clarity and certainty for both people who need adaptations, and those who are expected to deliver those adaptations.

Our perspective however, is as an organisation that represents people on the very edges of society, in supported accommodation, or insecure tenancies, or social housing, or who are / have been homeless. As a result, we want to ensure that these service standards are inclusive of a range of specific challenges faced by more specific client groups. The timings and approaches laid out in the document are welcome, and positive, and we would broadly endorse the response from Tai Pawb in their general response to this.

However, there are specific additions or clarifications we would like to include:

- Addition to all standards: Addition of 'vulnerable' as a specific group to ensure maximum inclusion;
- Addition to standard three: Communication
- Addition to Figure 2
- Addition to document as Appendix: *What is a trauma-informed approach and what are psychologically informed environments?*

ADDITION TO ALL STANDARDS: *Addition of 'vulnerable' as a specific group to ensure maximum inclusion*

We would add to the service standards, in all sections, 'vulnerable', so that future applicability of the service standards read:

> *The purpose of a housing adaptation is to help vulnerable / disabled / older people to remain or become more independent in their own home.*

There are similar sentences throughout the service standards, we would advocate that all are changed. By adding vulnerable, this would ensure that service providers are also meeting the needs of following client groups. For ease of reading, we have added potential adaptations beside each client group, to indicate the importance of including them. Please note that the types of adaptations are not exhaustive.

CLIENT GROUP	TYPICAL ADAPTATION EXAMPLES
Domestic abuse survivors	Target hardening measures (alarms, panic rooms, etc)
People experiencing mental health problems	"Psychologically informed environment" could be considered as an adaptation.
People with learning disabilities	This will be largely covered by disability, but particular adaptations would include

	elements of technology to enable independent living (timers, monitoring, etc)
People with autism	Soundproofing, well ventilated, etc.
People with substance misuse problems	Target hardening measures, typical adaptations for people with disabilities if physical injury sustained

As can be seen, adaptations are not just limited to those who are disabled or who are classed as older people, and the service standards need to be cognizant of that.

ADDITION TO STANDARD 3: COMMUNICATION

Under this standard, we would make the specific addition, at the end, to read:

> *"All communication will be expected to be trauma-informed, to avoid the negative consequences of re-traumatisation, and to ensure service adaptation standards are matched to other service provider expectations."*

We would also add:

> *"Specific service user groups may need additional measures to facilitate communication, particularly if experiencing mental health problems or substance misuse problems."*

ADDITION TO FIGURE 2:

In general terms this figure is helpful in understanding the types of adaptations and the extent to which they can be expected by tenants. However, we would urge other examples of adaptations to be included, so that adaptations specific to other groups identified above are included:

We would recommend adding the below specific points:

Category	Nature of Work Required	Example of work	Funding source
Small Adaptations	As written	ADD: • Panic alarm • Specific trauma-informed painting work (specific colours, shapes, etc, can help to address some negative	ADD: • Supporting People • VAWDASV target hardening

		expressions of mental health problems – see trauma-informed section below)	
Medium Adaptations	As written	ADD: • CCTV • Secure entrance / exits	ADD: • Supporting People • VAWDASV target hardening
Large Adaptations	As written	ADD: • Panic room • Soundproofing	ADD: • Supporting People • VAWDASV target hardening

Addition to document as Appendix: *What is a trauma-informed approach and what are psychologically informed environments?*

Trauma-informed approaches draw on the research around adverse childhood experiences, and the recognition that services have to respond differently to individuals who have had experiences of trauma. This has led to changes in the ways services are delivered, in particular, changes to the physical environment to ensure that offices, accommodation, and similar locations, are more welcoming and accessible. In a professional setting, this can mean the removal of screens that create barriers between individuals and "officialdom". In a home setting, this can mean freedom for individuals to paint in different colours, or to adapt the way accommodation can look to ensure a more sustainable, longer-term tenancy and a feeling of safety.

Often the adaptations made as part of a psychologically informed environment are small, but they can make a huge difference. One notable example from a provider of supported accommodation, was the provision of painted symbols on the wall to enable an individual with schizophrenia and disassociative identity disorder to feel safe, and maintain their tenancy. The cost was small, but the adaptation made a massive difference. By including psychologically informed environments in the service standards as something to consider, it may be that specific changes to the physical environment could be requested by a range of tenants to make their tenancy more sustainable and accessible.

Conclusion:

We are confident that the service standards as shared are a good base to build from, and as long as specific amendments are made to provide support for other marginalised or vulnerable group, and as long as trauma-informed approaches are also considered, this will make a real and tangible difference to the lives of vulnerable people.

Thank you for the opportunity to respond.