The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

General Comments

CIH Cymru welcomes the opportunity to provide a information to support the Equality, Local Government & Community committee as it undertakes its inquiry into rough sleeping in Wales.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a one housing system approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in a sustainable framework;
- improves standards and develops the consumer voice within the private rented sector
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;

promotes consumer rights & tenant involvement;

and supports the continued professional development of housing practitioners.

1. Introduction

1.1 The Housing (Wales) Act 2014 introduced a new approach to addressing and mitigating homelessness in Wales that has been largely seen as a success in comparison to the previous system in operation. This has included:

- A new duty to help anyone threatened with homelessness within the next 56 days.
- A duty to provide help to any homeless person to assist them in securing a home.
- A power rather than a duty to apply the intentionality test.
- New powers for local authorities to discharge their homelessness duties through finding accommodation in the PRS.
- Stronger duties on housing associations to support local authorities in carrying out their homelessness duties.

1.2 The new measures, which have assistance for all at its heart ensure that everyone can gain some form of support. We strongly welcomed the new provisions and are encouraged by the results they are producing.

1.3 Despite this more needs to be done to counter some of the current issues experienced in operating the new approach – theses issues include:

- The recording of “non-cooperation” and how we ensure reasons behind this are well understood and monitored consistently
- Ensuring Local Authorities have enough capacity and resources available to find person-centred solutions – at present a large proportion of resources is spent on financial barriers (i.e deposits) to ensure someone can move if
threatened with homelessness, rather than mediation and sustaining the current tenancy.
- Capacity with Local Authorities to meet the increasing demand for homelessness services

1.4 The following response provides an overview of rough sleeping in Wales and reflects on some of the measures needed to ensure that prevention and mitigation are realised consistently within services delivery as well as national policy.

2. Rough Sleeping in Wales
2.1 Since 2015 Local Authorities having been carrying out an annual count of people sleeping rough in Wales. This has shed greater light on the extent of the problem and the figures demonstrate a significant rise in rough sleeping in Wales since 2015.

2.2 The 2015 data shows that:
- In the two weeks from 2-15 November 2015, 240 persons were sleeping rough across Wales; Local authorities reported a total of 82 individuals observed sleeping rough in Wales between 11pm on Wednesday, 25 November and 3am on Thursday, 26 November 2015; and Local authorities also reported that there were 180 emergency bed spaces across Wales, of which 19 bed spaces (11%) were vacant and available on 25 November.

2.3 The 2016 data shows that:
- In the two weeks from 10-23 October 2016, 313 persons were sleeping rough across Wales; Local authorities reported a total of 141 individuals observed sleeping rough in Wales between 10pm on Thursday, 3 November and 5am on Friday, 4 November 2016; and Local authorities also reported that there were 168 emergency bed spaces in Wales of which 40 (24%) were unoccupied and available on 3 November 2016.

2.4 The latest data from 2017 indicates that:
- Local authorities estimated that 345 persons were sleeping rough across Wales in the 2 weeks between 16th and 29th October 2017. This is an increase of 10 per cent (32 persons) compared with the exercise carried out in October 2016. Local authorities reported 188 individuals observed sleeping rough across Wales between 10pm on the 9th and 5am on 10th November 2017. This was an increase of a third (47 persons) on the previous year. Local authorities reported 233 emergency bed spaces across Wales. Of these, 42 (18 per cent) were unoccupied and available on the night of the snapshot count. In 10 local
authorities reporting rough sleepers on the night of the count there were no unoccupied, available emergency bed spaces.

2.5 The figures should rightly cause concern at the level of increased observed after a 12 month period. The homelessness monitor in Wales produced by crisis highlighted a number of reasons for the increase including:

- Better data and resources to capture data (in 2016 more resources were available to monitor known rough sleeping locations)
- The impact of welfare reform
- The removal of priority need for ex-offenders
- An increase in the amount of rough sleepers moving from rural areas
- Increase in European Economic Area Nationals ineligible for mainstream welfare benefits

3. **Housing First**

3.1 We believe the Welsh Government should explore the options for supporting the provision of Housing First projects across Wales. Lessons should be learnt quickly from areas where these project are already producing positive results.

3.2 Housing First offers permanent accommodation to people in chronic need without requiring them to go through the formal homelessness system of waiting lists, hostels and temporary accommodation. While models in different places may differ slightly, Housing First tends to be directed at people who are sleeping rough or have experienced repeat homelessness and have mental health and addiction problems.

3.3 Under Housing First there is no requirement for the homeless person to be “housing ready” or to have addressed their addiction problems before moving into a permanent home. Health and addiction issues are addressed after housing has been secured, and intensive, open ended support is provided to help the person to maintain their tenancy.

3.4 The most basic guiding principle of Housing First is that housing is a human right and that it should be the starting point of supporting a person to recover from other issues such as addiction and poor mental or physical health. The Pathways model sets out five clear principles which should underpin every Housing First project:

- Housing – Immediate access to housing with no readiness conditions.
- Choice – Consumer choice and self determination.
- Support – Individualised and person-driven support is provided.
- Community – Social and community integration.
While the principles have been adapted or built upon for different projects, the common foundations of Housing First are that people have a right to a home, that this right is not subject to conditionality and that people have access to intensive, open-ended, unconditionally-provided support.

3.6 **Case Study – Isle of Anglesey County Council**

The local authority undertook an extensive review of the evidence around Housing First, reflecting on its use in the US and Scotland and concluding that as a model, it had the potential to reach service users who were sleeping rough and had well-entrenched histories of homelessness. A number of benefits were identified to support the provision of a pilot; these included:

- rapid re-housing of street homeless people;
- access to support 24 hours a day, including on call service at night;
- support being person centred; and
- effective alternative to hostel provision.

Further to this, ACBC recognised the challenge posed by the proposed cap on social rents at Local Housing Allowance (LHA) rates and in their proposal highlighted that there would need to be an individualised approach to ensure a sustainable housing solution could be identified for service users (Westminster Government has since announced that cap will no longer be extended to social rents). The local authority also recognised that the PRS would be one of the major sources of sustainable housing solutions. Further to this, it was felt there may be clear advantages of the establishment of lease agreements with private sector landlords.

### 3.9 Cost-benefits analysis

An assessment of the cost savings for Isle of Anglesey County Council indicates that savings can be made by investment in services for homeless people with complex needs. Investment of around £11,843 per unit per year (based on current tariff system 15 for floating support) in non-accommodation based support for 12 people (assumes four have mental ill health, four drug related problems and four alcohol related problems) saves additional expenditure of £247,134 representing a saving of £1.74 for every £1 of Supporting People funding invested.

### 3.10 Outcomes

As the commissioning organisation, IoACC regularly worked with the Wallich to monitor the effectiveness of the service provided. Monitoring of the service covering its impact during a six month period revealed that:

- Support workers largely focussed on working towards a small and well-defined set of person-centred outcomes. In practice, this seemed to work best given the chaotic nature of the experiences of the client group.
- Of the 119 service users supported between April 2012 – August 2017:
  - 78% are still in accommodation;
43% are in the original accommodation where the support was provided; and 6.7% have re-presented as homeless within 56 days of support being taken away.

4. The Supporting People Programme
4.1 The Supporting People Programme plays a pivotal role in supporting those already experiencing homelessness and ensuring vital preventative services are in place to address those at risk of becoming homeless.

4.2 Its role in support the reduction and eradication of rough sleeping is one which cannot be underestimated. The success of Housing First in Finland for example has been driven by the availability and provision of support services which sustain tenancies, address additional needs (such as mental health issues) and increase empowerment and skills development. The effectiveness of housing first projects in Wales will go hand in hand with the future of the Supporting People Programme Grant. (SPPG).

4.3 As one of the Welsh Government’s largest revenue budget’s, it is understandable that the SPPG receives a considerable level of scrutiny around how funding is allocated and spent. Whilst budgetary pressures has meant that the level of funding has reduced overall, in recent years however there has been protection for the budget recognising the vital work provided through services funded by the grant.

4.4 We strongly welcome the Welsh Government’s support for this area and believe a continued focus and protection for this budget is vital if we are to sustain services that reduce homelessness, tackle poverty and increase employment opportunities.

4.5 We are concerned however that whilst protection has brought with it an annual renewal of confidence in the sector, this cycle does not lend itself well to the long-term planning of services. Year on year the housing sector continues to campaign for the protection of the SPPG as the Welsh Government undertakes the drafting and confirmation of its budgetary commitments. Whilst it is clear that the voice of the sector has been well recognised in both this, and previous years, greater certainty is required to ensure the SPPG is able to be as effective as possible in meeting both long and immediate short-term demand.

4.6 The most recent Welsh Government budget has reflected that SPPG is sustained at current levels but in 2019/20 the ring-fence, as it appears, will be removed and the budget combined with a number of other prevention-type budgets. We have real concerns that this move will create greater uncertainty and create similar consequences to developments in England following the removal of the ring-fence from the equivalent budget. In England the ring-fence was removed in 2009 and following a Freedom of Information request by Inside Housing, substantial cuts we’re
highlighted following this with some local authorities cutting the budget line for Supporting People by up to 60%.\(^1\)

4.7 Whilst we understand the Welsh Government’s rationale in seeking sensible approaches to ensuring funding is as effective as possible we urge caution in pursuing these options. Service providers will be understandably anxious considering the situation that developed in England where Supporting People funding has disappeared in the aftermath.

4.8 We strongly urge the Welsh Government to maintain the ring-fence for the SPPG programme and provide certainty for service providers at an early stage as to not impact the delivery and planning of services locally.