

The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)

Report from the Homelessness Action Group for the Welsh Government
March 2020

About the Homelessness Action Group

The Welsh Government set up the Homelessness Action Group (the Action Group) to recommend the steps needed to end homelessness in Wales. The Minister for Housing and Local Government, Julie James AM, asked the Action Group to answer the following questions:

1. What framework of policies, approaches and plans are needed to end homelessness in Wales? (What does ending homelessness actually look like?)
2. What immediate actions can we take to reduce rough sleeping between now and the winter of 2019/20, and to end rough sleeping altogether?
3. How do we put the delivery of rapid and permanent rehousing at the heart of preventing, tackling and ending homelessness?
4. How can we ensure joined-up local partnerships and plans are put in place to prevent, tackle and end homelessness throughout Wales?

The Action Group's first report¹ answered question 2 but with some reference to longer-term solutions to rough sleeping and other forms of homelessness. This report addresses question 1, building on the longer-term solutions in our first report but with reference to the other questions too. We will produce a further report to address the remaining questions.

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¹ Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term* <https://gov.wales/sites/default/files/publications/2019-10/homelessness-action-group-report-october-2019.pdf>

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Chair's foreword

The Welsh Government has set an ambitious goal to end homelessness in Wales, and has clearly described this as a public services issue rather than simply being about housing. The first report of the Homelessness Action Group focused on rough sleeping; both short-term actions to tackle rough sleeping in the winter of 2019/20 and longer-term actions to prevent people from being forced to sleep rough in the first place. A number of these actions were taken by the Welsh Government and local authorities in partnership with other local agencies.

This report of the Homelessness Action Group is the second and addresses the question of what framework of policies and approaches is needed to end homelessness altogether. From the beginning, the Action Group chose to take a prevention approach to this; an approach to ensure that homelessness only happens very rarely, that when it does happen it is brief, and that once it has happened to an individual or family then it is prevented from happening again. As a nation, Wales takes a proactive stance on child rights and the duties we have to future generations. The Action Group is hopeful that a similar proactive and rights-based approach will be taken to homelessness, and if it is then homelessness can and will be ended for good.

Our work on this report has addressed several levels of prevention. Universal prevention recognises that homelessness is not a stand-alone issue. Child poverty and Adverse Childhood Experiences are known to be predictors of homelessness and need to be addressed to lay the foundations for ending homelessness. It is well-known that tackling homelessness is not just a housing issue but it is equally clear that a settled, secure and suitable home is part of the solution every time. The Action Group recommends treating adequate housing as a right; something that every citizen should be able to expect. With such an approach, we would ensure that enough housing is available, that housing is available that everyone can afford, and that where housing is paid for or supported by the state then citizens should not fear being evicted into homelessness. These are radical but practical solutions, and necessary if we are going to seek to end homelessness for good.

We also know that some groups of people, because of the life experiences they have had, are more likely to experience homelessness than others. Our recommendations include targeted prevention, which involves taking specific action to address this. If we know that people are more likely than others to experience homelessness, then we should look to prevent that from happening by not discharging people from public services into homelessness, and by ensuring joined up approaches across public services to implement 'pathways' that support people to avoid homelessness.

There is also a point in time where people or families are at imminent risk of experiencing homelessness. Wales has a proud record of preventing homelessness at this stage, having pioneered homelessness prevention and relief duties. This approach has since been adopted in England, and is currently being developed further in Scotland. In Wales about two-thirds of recorded homelessness is now prevented by the hard work of local authority housing teams and social and private landlords. We need to do better, and the proposals to increase security through a 6-

month notice period are a huge step in the right direction. If we now take that 6-month threshold as the point where we consider the risk of homelessness to be imminent then we will have more time to help people. And, if we extend those prevention duties to all public bodies working in partnership to rapidly rehouse people who are at risk of, or are experiencing homelessness, then the Action Group believes that homelessness really can be only rare, brief and non-repeated.

The recommendations in this report have been produced by the Homelessness Action Group in consultation with people who have experienced homelessness, and people who work in housing or homelessness. We also consulted with people who have lived experience of homelessness on draft recommendations. There was a high degree of support for the draft recommendations but we also adjusted them in light of the feedback we had, which is reported in full in the annexes of this report. We believe it is a practical set of recommendations which if implemented in full and funded properly will enable Wales to go further to ending homelessness. I would like to see an action plan to take this forward, setting out the ambition to end homelessness together with the practical agreements on funding and how changes are paced over time.

There will be two further reports from the Action Group. One will set out how to ensure that rapid rehousing (moving people into settled, secure and suitable homes as quickly as possible as the default solution when homelessness cannot be prevented) is at the heart of the system for tackling homelessness. The other will set out the role of local and regional partnerships working in a joined-up way with the aim of ending homelessness.

I am grateful to the 13 members of the Homelessness Action Group for giving their time, energy and ideas to bring this comprehensive set of recommendations together, and look forward to seeing the Welsh Government taking the recommendations forward with partners in a clear and properly-funded action plan.

1.0 Introduction

1.1 A definition of homelessness

There are currently many families and individuals across Wales who are without a home. This includes very visible homelessness, such as people rough sleeping, but also less visible forms, such as people staying in sheds or outhouses, on the sofas of family or friends, or living in hostels and bed and breakfasts without a plan to move on.

There is lots of evidence that being forced to be homeless causes harm both to individuals and families, and society as a whole. This includes harm to mental health, physical health, relationships and wellbeing, and increased need for public services support.²

Work by Heriot Watt University sets out a definition of ‘core homelessness’ that estimates that on any given night in 2017 around 5,200 households across Wales were homeless.³ This definition includes people who were:⁴

- Rough sleeping.
- Sleeping in tents, cars or on public transport.
- Squatting (unlicensed and/or insecure accommodation.)
- In unsuitable non-residential accommodation, e.g. ‘beds in sheds’.
- Hostel residents.
- Users of night/winter shelters.
- Domestic abuse survivors in a refuge.
- In unsuitable temporary accommodation (which includes bed and breakfast accommodation, hotels etc.)
- ‘Sofa surfing’ – staying with others (not close family), on a short term/insecure basis/wanting to move, or in crowded conditions (note this does not include students).

The numbers of people experiencing core homelessness have increased across each nation of Britain and across Britain as whole since 2011. While increases in rough sleeping have attracted political and media attention, it is only part of the picture. The 2017 figures suggest that for each household rough sleeping in Wales on any given night there were almost 10 sofa surfing.⁵

² See for example Homeless Link, ‘Impact of homelessness’ accessed 20 January 2020 on <https://www.homeless.org.uk/facts/understanding-homelessness/impact-of-homelessness>

³ Crisis blog (2018) ‘What is the scale of homelessness on any given night?’. Accessed 16 January 2020 on <https://www.crisis.org.uk/about-us/the-crisis-blog/what-is-the-scale-of-homelessness-on-any-given-night/>

⁴ Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.

⁵ See Annex 3 for the full Wales and GB tables.

1.2 How everyone can be housed and homelessness ended

This report sets out the overall framework of policies, plans and approaches that will ensure everyone in Wales can be housed and homelessness is rare, brief and non-repeated both across society and for individuals. This means that:

- **Homelessness is rare:** there are more measures to prevent it and we take opportunities to help people at a much earlier stage to ensure they do not lose their home in the first place.
- **Homelessness is brief when it happens:** in some cases homelessness cannot be prevented but it should be a very brief experience, with people rehoused as soon as possible with all the support they need.
- **Homelessness is non-repeated:** as well as being brief, any experience of homelessness should be a one-off and people should not be forced to experience multiple episodes of homelessness in their lives.

The most important driver of homelessness is poverty.⁶ Homelessness across Wales and the rest of the UK is shaped by public policy choices, including housing supply and affordability, welfare spending, and how successful governments are at offering assistance to people who are homeless, at risk of homelessness, or who have experienced trauma.⁷ Whether intentionally or not, decisions in all these policy areas can help or hinder efforts to end homelessness.

Wales is also affected by a mix of devolved policy decisions, set by the Welsh Government and the National Assembly for Wales, and by reserved decisions by the UK Government and UK Parliament that affect all parts of the UK.

Across Wales there has been progress in tackling homelessness and this report seeks to build on that work. The implementation of the Housing (Wales) Act 2014 is one example of where outcomes, funding and systems have shifted to make it rarer for people at risk of homelessness to get to crisis point before getting help.

To take the steps needed to house everyone and end homelessness this report offers a framework for ending homelessness and, against this framework, suggests what is already working, what needs scaling-up or scaling-down, and what Wales needs to start doing. Some changes can happen relatively quickly but others are deeper changes to systems, cultures and behaviours that will take time, investment and leadership.

This report is specific, wherever possible, about the exact steps needed and who is responsible for them but where this is not possible (e.g. due to a shortage of evidence of what works) we acknowledge this and offer the overall ideal solution that might need further development or evidence to finalise into a specific action. While

⁶ Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. Crisis: London

⁷ Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis, p.28

we concentrate primarily on changes the Welsh Government and its partners can make, we also identify the changes that need to happen more broadly in civil society to end homelessness in Wales and also changes that are primarily or entirely the responsibility of the UK Government at the moment.

Ending homelessness will require a long-term, concerted effort by the Welsh Government, local authorities and the wider public service sector, and civil society. It will need a plan that delivers the Welsh Government's stated strategic direction.⁸ This report recommends the Welsh Government, with partners, produce and publish such an action plan in response to this report's recommendations, including how the action plan will be funded. This action plan should be clearly linked to an outcomes framework showing how ending homelessness will be tracked and achieved across public services in Wales, and by working closely with broader civil society.

The recommendations together represent a system-level change from an emphasis on tackling homelessness when it happens, or preventing it when it has become almost inevitable, to an approach based on preventing homelessness before it happens.

The framework for ending homelessness in this report is based on the five types of prevention that we also referred to in our previous report on tackling and ending rough sleeping.⁹ The Action Group's recommended framework also maps against the Welsh Government's public services definition of prevention (which also has five points).¹⁰ All of these are mapped against the definition of ending homelessness by making it rare, brief and non-repeated.

1.3 Making homelessness rare

In the course of the Action Group's work we consulted people who have experienced homelessness. Even though many of the people we spoke to were now housed, only one in 10 people (10%) said they never worried about their housing situation, which suggests the stress of homelessness remains with people even after crisis situations have been resolved.¹¹ Respondents said:

- *"I became homeless suddenly and found the whole thing traumatic and confusing."*
- *"Tackling homelessness should start at a young age and not when you reach the status of homelessness."*
- *"You need to stop putting people in a box and provide support required to the individual as needed."*

⁸ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*. Accessed from <https://gov.wales/sites/default/files/publications/2019-10/homelessness-strategy.pdf>

⁹ Fitzpatrick, S., Mackie, P., and Wood, J. (2019) *Homelessness Prevention in the UK – Policy Briefing*. Accessed from <http://thinkhouse.org.uk/2019/cache0719a.pdf>

¹⁰ Welsh Government (2019) *Budget Improvement Plan*. Accessed 16 January 2020 on <https://gov.wales/sites/default/files/publications/2019-12/budget-improvement-plan.pdf>

¹¹ See Annex 1 for more details of the consultation

The Welsh Government's current homelessness strategy recognises that homelessness is something that society, government, decision-makers and policy-makers can prevent, by tackling the structural causes of homelessness (especially poverty and housing stress) and through earlier action and supporting people when and where they need it.¹² Doing so can reduce the stress and damage to people who might otherwise be homeless.

1.4 Making homelessness brief and non-repeated

While the goal will be for homelessness to be rare, there will still be times when people lose their homes. When this happens, it should only be for a very short period of time, and a one-off, so it doesn't happen again. This report refers to this concept as 'rapid rehousing'. We offer some recommendations in this report on rapid rehousing in the context of the broader framework for ending homelessness but we will produce further work by Spring 2020 on how to make the transition from the current system to a rapid rehousing approach.

1.5 Language in this report

Some of our recommendations refer to the need for reframed communication about poverty and homelessness to help people better understand the problems and solutions needed. This is a work in progress and in this report we use some terms, such as 'vulnerable people' and 'complex needs', because these terms are currently in common use.

1.6 Framework for ending homelessness in Wales

The following table shows our recommendations, placed in a framework to make homelessness rare, brief and non-repeated in Wales. This report refers back to the Welsh Government's existing prevention framework for budgeting, due to the importance of a broader public service response to homelessness.

¹² Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*

Framework for ending homelessness in Wales

Homelessness rare, brief and non-repeated	Public service-wide prevention definition (Welsh Government budget) ¹³	Action Group's recommendations	
Rare (maximum prevention)	<i>“Primary Prevention: Building resilience – creating the conditions in which problems don’t arise in the future. A universal approach.”</i>	Overall solutions (recommendations 1-5 and 19 in this report)	Universal prevention (recommendations 6-12 in this report) to work across the population at large to create the conditions in society where homelessness is rarer
	<i>“Secondary Prevention: Targeting action towards areas where there is a high risk of a problem occurring. A targeted approach, which cements the principles of progressive universalism.”</i>		Targeted prevention (recommendations 13-15 in this report) to help people at an earlier stage if they are at greater risk of losing their home
	<i>“Tertiary Prevention: Intervening once there is a problem, to stop it getting worse and prevent it reoccurring in the future. An intervention approach.”</i>	Ending homelessness outcomes framework	
		Support for workforces; funding and commissioning	Crisis prevention (recommendations 16-17 in this report) to help people around crisis point (officially 56-days) to avoid homelessness

¹³ Welsh Government (2018) *Draft Budget 2019-20 - Outline proposals*. Accessed 20 January 2020 on https://gov.wales/sites/default/files/publications/2018-10/2019-2020-outline-draft-budget-narrative_0.pdf

<p>Brief (a quick response when prevention fails)</p> <p>Non-repeated (sustainable solutions)</p>	<p><i>“Acute Spending: Acts to manage the impact of a strongly negative situation but does little or nothing to prevent problems occurring in the future. A remedial approach.”</i></p>	<p>Support to change cultures to end homelessness</p> <p>Ending migrant homelessness</p>	<p>Currently Emergency Prevention (people at immediate risk, especially people sleeping rough) and Recovery Prevention (prevention of repeat homelessness) but this report recommends scaling-up Rapid Rehousing (recommendation 18 in this report) and reducing the need for Acute Spending</p>
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1.7 Consultations with people to inform this report

Annex 1 sets out the first phase of the Action Group's work to consult people with lived experience of homelessness and to consult people who work to end homelessness, especially in housing and homelessness roles. Annexes 5a and 5b are the Cymorth Cymru reports on the second phase of the consultation, which comprised consultation events with nearly 80 people in north and south Wales who have experienced homelessness and their views on the recommendations in this report.

People who responded to the Action Group's surveys and attended workshops came from a range of backgrounds, sectors and geographic areas but there was broad consensus on the solutions. Action Group members also attended conferences, events and meetings to talk to people face-to-face, present the survey findings, and further develop our understanding of people's views.

The key findings that helped us develop this report include:

From people with lived experience of homelessness

Online survey findings in the first phase included:¹⁴

- Roughly half the respondents had experience of homelessness within the past five years, and many people are now housed, but nine out of 10 people still worry about their housing situation.
- The most highly prioritised solution to homelessness was helping public services to take a kind and compassionate approach when working with people needing support.
- Open comment responses in surveys focused on the need for affordable and secure accommodation.

"Make it easier for us to get a place, even if it is only for one night off the street, then you can find out what situation [we] are in"

"There shouldn't be a time limit [on support] as people's needs are different, some people need longer."

"More compassion, understand the impact on people's mental health! Understand the barriers more. [Taking away] barriers takes a huge stress off a homeless person! Often they are made to feel worthless like they don't matter!"

In the second phase, Cymorth Cymru's two Experts by Experience engagement events took place in Colwyn Bay and Cardiff. Approximately 80 people with

¹⁴ See Annex 1 for more details

experience of homelessness worked in groups to discuss how different public services could help to prevent and end homelessness.

The topics for discussion included:

- Housing and support
- Welfare
- Health services
- Social services
- Education
- Criminal justice.

The groups were also asked to consider how homelessness could be prevented or alleviated for the groups that the Action Group identified as at particular risk of homelessness in the 'targeted prevention' section of this report. Finally, the groups were asked about how to tackle stigma and change public and professional attitudes towards people experiencing homelessness, as well as to consider whether people had any other comments not otherwise covered.

Annex 5 is the Cymorth Cymru report on the second phase of the Action Group's consultation with people who have lived experience of homelessness. Overall the consultation found there was a high level of support for almost all the Action Group's draft recommendations. The Action Group did, however, make some changes and additions to the draft recommendations in light of the comments by people with lived experience including:

- In targeted prevention: making sure that support to be 'rent ready' was a suggested intervention for young people at risk of homelessness; and adding people experiencing bereavement to the risk group of people experiencing relationship breakdown or difficulties.
- In prevention and rapid rehousing: adding references to better access to mental health support, both to prevent and rapidly respond to homelessness.
- In universal prevention: references to the role of empty properties in increasing the supply of affordable and social housing.
- And making a specific recommendation on involving people with experience of homelessness in the design, delivery and evaluation of services.

From people who work to end homelessness

We asked people working in roles to end homelessness what the most important solutions would be to help them specifically. The two mostly highly prioritised solutions were:

- Quicker referral routes into social services and health services, including mental health and substance use.

- Better supply of accommodation more generally. We asked separately about better supply of affordable, social, and move-on/temporary accommodation and all answers featured highly.

“Access to information/guidance and support at times and venues that are available when people are able to access them. Not during 9 to 5 hours with appointments people cannot keep.”

“All sectors and public bodies taking and sharing responsibility”

“More affordable housing. More affordable housing. More affordable housing.”

Following the survey with people working to end homelessness we attended meetings and events in late 2019 to further consult (a list of these events is in Annex 1). The Action Group presented back survey findings for further discussion.

People frequently referred to difficulties in supporting people in a trauma-informed and compassionate way despite wanting to do so. There were references to how current funding/commissioning arrangements can increase staff turnover (due to shorter-term contract periods), high workloads with low recognition for the pressures and expertise people have, and pressure to deliver against quite short-term targets. There was also fear about a lack of sustainability or resilience in some organisations, with services being reliant on one or two individuals and no contingency planning for sickness or when people leave.

“...the quality of the staff I've seen in the projects isn't the problem: no matter how good you are no one is going to be able to deal with the workload and stress while getting paid just above minimum wage, with basic holiday and no clear emotional and mental support that they can access quickly and confidentially”.

“Public services only lean towards being uncompassionate when the support workers are overworked and stressed...The support workers need support.”

“It seems to be increasingly difficult to recruit and retain support staff as service contracts are cut to the bone and support salaries slashed accordingly - I've seen support worker posts advertised at minimum wage! We need to value support workers, pay well and respect the services they provide.”

There were operational frustrations that led people working to end homelessness to feel pessimistic about the prospects of ending homelessness overall. The main frustration was about the recognition that a multi-agency, earlier response to helping people experience homelessness is needed - but not yet in place.

“More integrated working across sectors tends to bring more successful outcomes. Unfortunately, the ability to do this relies on multi-agency commitment and the resources to make this happen.”

“Engaging [the support of] front line staff in health, social care, mental health, and addictions”

“Closer working between health and housing sector to deliver solutions. Engagement with health can be challenging.”

In response to these views the Action Group decided to include a report section on supporting workforces and the change in culture needed to end homelessness.

2.0 Public services working together to end homelessness

2.1 Outcomes to end homelessness

The Action Group agrees with the Welsh Government's view that "homelessness cannot be prevented through housing alone".¹⁵ While housing services have a critical role, many of the elements of a successful approach will come from other services. The framework for ending homelessness in this report relies on this wider work, both to prevent more cases of homelessness earlier and to rapidly rehouse people if they do lose their home.

At the moment there are numerous policy initiatives, planning processes and strategies that aim to achieve differing outcomes. For example, these include wellbeing assessments and joint planning in the Social Services and Wellbeing Act 2014, the Housing Support Grant, and *A Healthier Wales*, which all co-exist and overlap in prevention and the promotion of wellbeing. There are existing structures such as Regional Partnership Boards (health, social care and housing), Local Mental Health Partnership Boards, and (Substance Misuse) Area Planning Boards. Making sure homelessness is 'everyone's business' came up in the Action Group's consultations, including improved mental health access and substance use support.

The Housing Support Grant guidance to local authorities also identifies specific opportunities for the grant to facilitate joint working to prevent homelessness, including in the policy areas listed above but also through the Children and Communities Grant; services to address violence against women, domestic abuse and sexual violence; probation and youth justice services; and support for marginalised groups. There will also be a single outcomes framework for the Housing Support Grant, and the Children and Communities Grant.¹⁶

To ensure these combined efforts work together to end homelessness we recommend agreeing outcomes for ending homelessness that all public services will aim to deliver, together with the funding, data and monitoring needed and the support for workforces to help create the conditions needed to end homelessness.

Recommendation 1: The Welsh Government should agree an 'ending homelessness outcomes framework' to help co-operation between all Welsh public services, housing providers, and support providers. The framework should aim to increase homelessness prevention and adopt best practice in supporting people experiencing homelessness to access and maintain the right housing for them. The starting assumption should be to use existing strategic planning structures to deliver this at local, regional and national level but a new structure or structures might be needed.

¹⁵ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*

¹⁶ Welsh Government (2020) *Housing Support Grant Guidance – Practice Guidance for Local Authorities*, section 3.4. Accessed 11 February 2020 on <https://gov.wales/sites/default/files/publications/2020-02/housing-support-grant-practice-guidance.pdf>

The Welsh Budget process has already adopted a general definition of prevention and government departments should use this immediately when reporting their planned Budget spending. The general definition is compatible with the framework in this report and helps government departments to meet the Future Generations Act 2015 and Public Service Board requirements. Examples of a sound future generations approach in homelessness prevention would include:

- Addressing severely restricted choice of housing for younger people due to unaffordability in many parts of Wales.
- Tackling childhood poverty and Adverse Childhood Experiences, given the evidenced link to future homelessness.
- Homelessness caused by climate change (e.g. rising sea levels).
- Demographic changes (e.g. helping meet the housing needs of a growing older population).
- Addressing the impact of school exclusions on homelessness in the future.

Recommendation 2: In the course of Budget scrutiny Welsh Government departments should report to the National Assembly for Wales on current and planned spending in their budgets in all five areas of homelessness prevention outlined in the ending homelessness framework (as outlined in this report) and in line with the Welsh Government’s generic prevention framework.¹⁷

2.2 Support for workforces

While this report recommends an outcomes framework for ending homelessness, together with the public service planning structures to deliver this, success will depend on workforces. A major theme in the Action Group’s consultation with people working in roles to end homelessness was a desire to have a workforce that is valued and supported to end homelessness.

Respondents did not believe this is the reality across all parts of Wales. People we spoke to were aware that workforces in other areas, such as social services and health, have a degree of ‘professionalisation’ (i.e. recognised career structures, pay levels, national occupational standards etc.) that the housing and homelessness workforce does not have. There was also a feeling of being poor relations both in employment terms and when joint working with other professions.

If we are to end homelessness in Wales, it is vital that everyone who works in a role helping to end homelessness feels valued and supported to do the best job they can. This means:

- Appropriate pay, recognition of competencies, non-monetary rewards/incentives and good conditions.
- Greater job security and reduced use of fixed-term contracts.

¹⁷ I.e. Universal/primary; targeted/secondary; crisis/tertiary; and acute spending (emergency and recovery prevention but with an increasing emphasis on rapid rehousing as the default approach over acute spending).

- Sufficient time and resource for professional supervision, therapeutic support and reflection, including a programme to address and prevent vicarious trauma (including processes to debrief staff after serious incidents).
- Career progression opportunities, including leadership development and succession planning.
- Accredited training, possibly through the development of national occupational standards (e.g. in Scotland housing support officers attain nationally-recognised vocational qualifications in housing or other relevant disciplines).
- Stronger joint working between local authorities.
- Support for the significant number of people who volunteer with homelessness organisations alongside the paid workforce. There is a need to recognise their role and value, but also ensure what they do can contribute to ending, rather than managing, homelessness.

Recommendation 3: The Welsh Government, local authorities and their service delivery partners should agree a plan to ensure the workforce is effectively supported to implement this framework. This includes:

- **Ensuring a psychologically-informed approach is taken across all public services in Wales.**
- **Further recognition and development of the skills, values and experiences of staff working to end homelessness, including consideration of a more formal approach to work-based learning and development especially in public services.**
- **Regular time for reflection and case supervision for staff who work directly with people affected by homelessness.**
- **Further steps to make roles and terms and conditions of staff as attractive as possible to prospective and current staff.**

2.3 Culture and change management

Wales has recent experience of changing culture as part of the Housing (Wales) Act 2014. Part 2 of the Act required housing options teams in local authorities to move from applying processes to people towards working with people to resolve their housing issues, i.e. a more collaborative, problem-solving approach.

The Welsh Government took a number of steps to support this change, e.g. a co-produced Code of Guidance, joint training, changing data collection systems, and work to better align Supporting People-funded services with homelessness prevention. This was positive, but evaluation of the legislation's implementation suggests further work is needed to re-emphasise this shift in culture and to further support those directly involved in implementing the legislation.¹⁸

In setting out the framework and range of direct, practical recommendations in this report, the Action Group recognises that culture change will be vital to deliver the

¹⁸ Ahmed, A., Wilding, M. A., Gibbons, A. R., Jones, K. E., Rogers, M. M., & Madoc-Jones, I. (2017) *Post-implementation evaluation of the homelessness legislation (part 2 of the Housing Act (Wales) 2014)* interim report.

framework for ending homelessness. This includes a culture of ownership across public services for housing and homelessness; cooperation between services and different professional roles; and a more compassionate culture in broader society for people experiencing homelessness. We have identified a number of key principles of a culture that we consider will help enable an end to homelessness in Wales:

- **Clarity of focus:** developing and agreeing a definition of ending homelessness in all its forms by making it rare, brief and non-repeated with a longer-term focus on this and accountability for delivery against the outcomes framework.
- **‘Nothing about us, without us’:** ensuring people with lived experience of homelessness inform policy and practice; and staff are fully involved.
- **Psychologically/trauma informed environments:** fully implementing the five components of the Psychologically Informed Environments framework described later in this section.
- **Collaborative/no wrong door approach:** organisations working effectively together, taking mutual responsibility and ensuring people facing homelessness or housing problems are helped as early as possible and not ‘passed’ between services.
- **No wrong diagnosis approach:** ensuring the professional competence of workers to deal with symptoms and complexities as people present with them, to manage risk and to manage care while waiting further referral/assessment.
- **Learning/evidence based:** using data and research well and having time to reflect on work and doing what works to end – rather than manage – homelessness.
- **Problem-solving:** recognising that people who work to end homelessness do not always know the ‘right’ answer and need to work with others to identify solutions.
- **A compassionate approach, showing respect and being non-judgemental.**

To end homelessness in Wales, it needs to be ‘everyone’s business’ and the framework for ending homelessness sets out broadly how this should happen. A Welsh Government-led plan to end homelessness can develop these further into practical steps. The following organisations and sectors all have roles to play in ending homelessness in Wales and in ensuring people are appropriately housed:

- Local authority homelessness/housing options services.
- Other local authority services, particularly education and social services.
- Health, mental health, and substance use.
- Police and criminal justice.
- Political leaders – national and local.
- Community leaders.
- Third sector organisations.
- Landlords (both private and social).
- Faith groups (e.g. Housing Justice Cymru) and civic society.
- Funders.

- Business/business groups, such as the Federation of Small Businesses, Chambers of Commerce, Business in the Community, and Business Improvement Districts.
- Media across Wales.
- Academic and educational institutions.
- The public as a whole and segments of the public.

2.4 Enabling delivery of effective and psychologically-informed support services

Both Action Group consultations showed that the solutions people prioritised most highly relate to the fundamental issues of accessing emergency and suitable permanent accommodation; and making sure that support services are available and multi-agency working is happening. There was also a desire to ensure support is more trauma-informed. This included in surveys with people with experience of homelessness, where public services that were “kind, compassionate and treat people with dignity” were the number one policy priority.¹⁹

Our consultation survey and events with people who work in housing, homelessness and associated roles echoed this finding but also found clear willingness to do more and to work differently to end homelessness. However, there was frustration about some of the challenges and barriers that people seeking to end homelessness experience. The creation of the Housing Support Grant is an opportunity to remodel housing support and homelessness prevention funding to mirror the framework this report sets out, with a greater emphasis on addressing the root causes of homelessness and preventing homelessness at an earlier stage. It is also compatible with the Future Generations principles.

Many people experiencing homelessness or the risk of homelessness have experienced trauma – and are at risk of further trauma – so services should be commissioned and delivered using a psychologically informed approach that recognises this and responds appropriately. This approach extends beyond just the direct human interactions between support staff and people experiencing homelessness and into five elements. It is welcome that the Housing Support Grant’s guidance adopts these elements and they should be adopted more widely across public services.²⁰

1. **Psychological framework:** Organisations have a strategic and operational commitment to psychologically informed approaches. Service design, development, and evaluation are informed by an evidence-based, trauma informed model and the organisation’s culture is reflective, compassionate and person centred.

¹⁹ See Annex 1 for more details

²⁰ Welsh Government (2020) *Housing Support Grant Guidance – Practice Guidance for Local Authorities*, para. 2.9.1. Accessed 11 February 2020 on <https://gov.wales/sites/default/files/publications/2020-02/housing-support-grant-practice-guidance.pdf>

2. **Relationships:** High quality relationships are recognised as the principal tool in effective service delivery and staff have the time to develop trusting relationships with people using services. Psychologically informed approaches are used regardless of whether experiences of trauma are known and expectations are communicated in a clear, consistent and respectful way that avoids re-traumatising people.
3. **Physical and social environment:** Assessment and support environments are safe, welcoming and flexible, enabling positive, trauma-informed interaction between staff and people using services. People have choice and control over how they engage with services and the physical environment supports their wellbeing.
4. **Staff training and support:** Staff receive training and support to increase their understanding of trauma and how this can impact on people's engagement and relationship with services. Reflective practice, continuous learning, professional supervision and therapeutic support ensure that staff feel confident to work in a psychologically informed way.
5. **Evidence and learning:** Evidence is gathered to demonstrate the impact of psychologically informed approaches and this is used to support continuous learning and improve the effectiveness of services. Information on the experiences of people who use services is regularly gathered and is used to inform service planning.

It is also important to recognise that people experiencing homelessness often interact with a number of different public services, such as health, social services and the criminal justice system. It is therefore important that the focus on psychologically/trauma-informed approaches is embedded across all of these services.

Recommendation 4a: Welsh public services should provide support to enable all those working to tackle and end homelessness to take a psychologically informed approach in every aspect of their work. This support includes training, funding through commissioning frameworks and processes, and on-going support and development for staff. Funding for people experiencing homelessness should be identified, protected/ring-fenced, and guaranteed in the longer term to enable effective planning, commissioning and continuity of service provision.²¹

Recommendation 4b: Achieve a psychologically informed approach using the five elements (i.e. psychological framework; relationships; physical and social environment; staff training and support; and evidence and learning) on a whole organisation basis by:

²¹ This mirrors the recommendation from our previous report: Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*. "Recommendation 11: Commissioning of outreach services and other services for people who are rough sleeping or at risk of rough sleeping to promote sustained solutions that support people out of rough sleeping and homelessness for good."

- **Extending the existing PATH training on psychologically informed environments to all homelessness and related services and to all roles, including those who set and monitor strategy and budgets as well as people who deliver face-to-face services.**
- **Including a psychologically informed approach in the ending homelessness outcomes framework and commissioning.**
- **Making training in trauma-informed approaches standard for all professionals in services who come into contact with people experiencing homelessness or at risk of homelessness.**

2.5 Listening to people with lived experience of homelessness

The Action Group's consultation events and surveys found that people who have experience of homelessness felt listened to and valued because this report reflects their experiences. However, people clearly want their voices to be heard in the future and called for people with lived experience to be part of decision-making and delivery of services to end homelessness.

This can happen in a flexible way, so we have not recommended a specific format. The outcome should be a 'nothing about us without us' approach to people with lived experience of homelessness. Organisations should make sure they follow good practices in including as a critical part of their work the voices of people with lived experience in all aspects of service design, delivery and evaluation:

- Involving people early – and at key moments – to allow people time to genuinely influence the work.
- Ensuring the process is accessible in format, timing, and logistics (e.g. venues/online).
- Following a 'you said, we did' approach to give feedback on what an organisation did to respond to people's views and ensuring people's voices influence every step of decision-making, delivery and evaluation.

Recommendation 5: The Welsh Government, public services, housing providers and support providers should ensure that people with lived experience of homelessness have opportunities to influence decisions and the delivery and evaluation of services to end homelessness.

3.0 Making homelessness rare through Universal Prevention (Primary Prevention)

Evidence on the causes of homelessness has found:

“The most important driver of homelessness in all its forms is poverty... Other drivers include, availability and affordability of accommodation, the extent to which prevention measures are used, and... demographics...”²²

To tackle these drivers, universal prevention must increase in Wales. We must create the conditions in which fewer people and households are made homeless in the first place. We note that the Welsh Government’s homelessness strategy says that homelessness cannot be prevented through housing alone and needs all public services, voluntary sector, and wider civil society to help minimise the risk of homelessness.²³ These recommendations set out the broader interventions across the Welsh population to make homelessness rarer.

3.1 The right to live in security, peace and dignity

Housing is internationally recognised as a human right. Governments in Scotland and Wales have taken steps in recent years to embed aspects of international law on human rights into Welsh law, where devolved powers exist. A report by Dr Simon Hoffman for the Chartered Institute of Housing Cymru, Shelter Cymru and Tai Pawb makes the case for incorporating the UN Right to Adequate Housing into Welsh law, to build it into housing policy and law.²⁴

Depending on the way human rights laws are embedded in national law, this can provide a clear way for policymakers in government, and with judicial oversight of decision-making, to take a human rights perspective. It should also serve to ensure that all public service decision-making supports the aim of meeting the universal basic need for adequate housing. The UN defines the right to adequate housing more widely than “just a roof over someone’s head” but “the right to live somewhere in security, peace and dignity”.²⁵ It also says that the right “must be understood in relation to the inherent dignity of the human person”,²⁶ i.e. that a home is a basic human need that we must work together to meet for every person.

This is very compatible with the vision of the Welsh Government’s homelessness strategy for “A Wales where everyone has a safe home that meets their needs and

²² Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. Crisis: London

²³ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*, p.1

²⁴ Hoffman, S. (2019) *The right to adequate housing in Wales: Feasibility Report*. Tai Pawb, CIH Cymru and Shelter Cymru.

²⁵ Habitat, U. N. (2009). The right to adequate housing. *Fact Sheet No, 21*.

²⁶ UN General Assembly (2019) Guidelines for the Implementation of the Right to Adequate Housing. Accessed on 4 February 2020 on <https://undocs.org/A/HRC/43/43>

supports a healthy, successful and prosperous life.”²⁷ The principle of legislating to make housing a basic right in Wales also commands broad cross-party support. The Welsh Conservatives’ homelessness strategy specifically recommends this²⁸ and Plaid Cymru has committed to a plan to end homelessness that includes everyone being housed.

Recommendation 6: The Welsh Government should work towards incorporating a human right to adequate housing in Welsh law. The aim should be a duty on Ministers and local authorities to have due regard to the right to adequate housing when making decisions, and for the right to be judicially enforceable.

The Action Group notes that the Minister for Housing and Local Government told an Assembly committee the Welsh Government is considering the ‘due regard’ option but has concerns that the current shortage of housing supply will stop local authorities delivering the right.²⁹ The Action Group is clear that a plan to end homelessness should be grounded in a legally enforceable right to adequate housing that can continue beyond the current Welsh Government term. However, it is not totally clear whether Wales has the legislative powers devolved to formally enact this right at the moment. In the meantime, however, the Action Group believes the Welsh Government should consider adequate housing to be a right and deliver the policy requirements needed to realise this right.

A supply of genuinely affordable accommodation with choice across different tenure types is essential to housing people across Wales. The collection and publication of Welsh estimates of housing need is a welcome first step to putting in place plans to meet housing need.³⁰ Work by Heriot Watt University estimates the social housing need for people with experience of homelessness and for people on low-incomes across Wales is 4,000 new houses each year for 15 years (with further estimates for other tenures of housing, including intermediate rent, shared, and private rent).³¹

The Action Group’s consultation with people who have experience of homelessness found that people wanted empty properties to be brought back into use to increase housing supply. The independent review of affordable housing supply made specific

²⁷ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*, p.1

²⁸ Welsh Conservatives (2019) *More than a Refuge: tackling Wales’ homelessness crisis*. Accessed from <https://www.welshconservatives.com/sites/www.welshconservatives.com/files/2019-10/More%20than%20a%20Refuge%20Tackling%20Wales%20Homelessness%20Crisis%20October%202019.pdf>

²⁹ National Assembly for Wales (2019) Equality, Local Government and Communities Committee record, 17 October 2019. Accessed 23 January 2020 on <https://record.assembly.wales/Committee/5744#C234148>

³⁰ Welsh Government (2019) Estimates of housing need in Wales by tenure: 2018-based. Accessed 17 January 2020 from <https://gov.wales/estimates-housing-need-wales-tenure-2018-based>

³¹ Bramley, G. (2018) *Housing supply requirements across Great Britain: for low-income households and homeless people*. London: Crisis and National Housing Federation

recommendations on this issue.³² The National Assembly's Equality, Local Government and Communities Committee made further recommendations on empty properties to which the Welsh Government responded in November 2019.³³

Local authorities must ensure the housing needs of people who are at risk of homelessness or experiencing it are taken into account through Local Housing Market Assessments. A big part of provision will be social housing by local authorities and housing associations but it will also include private rented sector housing, intermediate affordable housing, and shared housing to give choice and flexibility to tenants. Planning guidance and local/regional development plans must ensure they expressly address the housing needs of current and projected homeless households (including, for example, families/individuals and young people specifically). The Affordable Housing Supply Review's recommendations should be delivered.³⁴

The Welsh Government and its partners can take immediate practical steps to deliver a right to adequate housing in advance of legislation. The key feature of these recommendations is that they should be implemented together. Increasing the supply of genuinely affordable accommodation must be accompanied with measures to promote access to and to maintain tenancies in housing across tenures. Along with this, local and regional planning for both housing *and* support needs should happen in tandem.

Wales is not currently building enough homes to meet need and to help end homelessness. Increasing the supply of housing is a critical part of delivering a right to adequate housing. This must be firstly about ensuring that the right homes are built in the right places and secondly about making sure that people currently experiencing homelessness or at risk of it are supported to access housing that is affordable and suitable for their needs. The focus on affordability within the social housing rent settlement is welcome, as is the statement alongside this of shared ambition between Welsh Government and social housing landlords to end evictions into homelessness from social housing.

Recommendation 7a: Increase the supply of social housing (delivering 4,000 new houses per year over 15 years) by increasing the capital funding available for building social homes and ensure that supply of all types of housing (social, affordable, private and owner occupier etc.) is sustained at the right level based on regular projections for homelessness and housing need. These should be set out in local housing market assessments and local development

³² Independent Panel on Affordable Housing Supply (2019) *Independent Review of Affordable Housing Supply*. Available from: https://gov.wales/sites/default/files/publications/2019-04/independent-review-of-affordable-housing-supply-report_0.pdf

³³ National Assembly for Wales (2019) *Equality, Local Government and Communities Committee report – Empty Properties*. Accessed 4 March 2020 on <http://senedd.assembly.wales/mglssueHistoryHome.aspx?lId=25057>

³⁴ Independent Panel on Affordable Housing Supply (2019) *Independent Review of Affordable Housing Supply*. Available from: https://gov.wales/sites/default/files/publications/2019-04/independent-review-of-affordable-housing-supply-report_0.pdf

frameworks should be based on this up to date assessment of need, supported by better evidence at a national level via a CORE-style data resource (i.e. continuous recording of data for social housing).

Recommendation 7b: The grant framework for allocating funding to build social housing should be informed by an understanding of housing need, which includes homelessness via local housing market assessments. The grant rate allocated should reflect the additional costs of building certain types of housing, including housing for young people and people who need single occupancy properties. The grant framework should support collaboration between housing associations and local authorities at grant allocation stage by requiring early conversations about the management of homes to support people currently experiencing homelessness, or at risk of it, to access and maintain tenancies.

Ensuring supply of housing is a critical part of delivering a right to adequate housing, including measures to promote access to and maintain tenancies in housing across tenures. This means using the Housing Support Grant, and other support grants and core funding, to deliver support to help people into tenancies and to help sustain them. There should be a pact agreed to cease all evictions from social housing into homelessness and to ensure that allocations policies help promote access to social housing for people with experience of homelessness or people at risk.

Recommendation 7c: As well as increasing supply of social housing to the level set out in Recommendation 7a, ensure supply of all types of tenure (i.e. social rent, private rented sector, shared, and intermediate rent) is sustained at the right level, based on regular projections for homelessness and housing need for people at risk of homelessness and/or on low incomes.

We agree with a National Assembly for Wales committee's recommendation to increase the Housing Support Grant and homelessness prevention budgets to meet the goal of ending homelessness.³⁵

Recommendation 7d: Increase the Housing Support Grant and homelessness prevention budget to help deliver support to people in all tenures and adequately fund the grant to deliver ending homelessness outcomes for people in all tenures of housing, as recommended by the Assembly's Equality, Local Government and Communities Committee.³⁶

Recommendation 7e: Local authorities must ensure provision of tenancy sustainment support for people in all tenures who may be at risk of

³⁵ National Assembly for Wales (2020) Equality, Local Government and Communities Committee - Welsh Government draft budget 2020-21, p.15. Accessed on <https://www.assembly.wales/laid%20documents/cr-ld12990/cr-ld12990%20-e.pdf>

³⁶ National Assembly for Wales (2020) Equality, Local Government and Communities Committee - Welsh Government draft budget 2020-21. Accessed on 3 February 2020 on <https://www.assembly.wales/laid%20documents/cr-ld12990/cr-ld12990%20-e.pdf>

homelessness, and tenancy readiness services for landlords and tenants. As part of this, work to develop a ‘first alert for rent’ process to help landlords and tenants to access earlier support in the event of any rent payment problems.

Wales should aim to achieve no evictions into homelessness from social housing, temporary accommodation, and the private rented sector, and increased access to social housing for people who are at risk of experiencing homelessness, who are currently experiencing it, or who have previous experience of it. This approach would include: a partnership/case conference approach to maintaining a tenancy or finding alternatives, not using ‘non-engagement’ as a reason for someone becoming homeless, use of social housing where an alternative home is necessary, a personalised and psychologically-informed approach to finding the best solution, a formalised approach, and recognition of this approach in commissioning of support services. Delivering this approach involves, for example, further work between local authorities and local health boards to deliver mental health support for people to help maintain tenancies in appropriate accommodation.³⁷

Recommendation 7f: Welsh Government, housing associations and stock-holding local authorities should agree and monitor delivery to cease all evictions into homelessness from social housing, and ensure that allocations policies do not exclude people experiencing homelessness or at risk of homelessness by ensuring ‘reasonable preference’ for people in this situation. Partners who deliver support services should be part of the pact between partners to end social housing evictions into homelessness that we recommended in our previous report.³⁸

Between 2007 and 2017 the private rented sector in Wales doubled in size.³⁹ While new and increased social housing provision is a major part of the solution, private rented sector accommodation of good quality should be part of the housing choice for tenants. The Renting Homes Act 2016 and the proposed amendments to it are welcome but there are some unresolved issues the Action Group recommends addressing.

Recommendation 7g: Enact the Renting Homes Act 2016 (and proposed amendments to the Act) to extend private rented sector contract notice periods but also commit to replacing the grounds for ‘no-fault eviction’ with new grounds that improve security for tenants and strike a better balance of rights and responsibilities with tenants and landlords.

³⁷ Welsh Government (2019) *Together for Mental Health, Delivery Plan: 2019-22* from <https://gov.wales/sites/default/files/publications/2020-01/together-for-mental-health-delivery-plan-2019-to-2022.pdf>

³⁸ This mirrors the recommendation from our previous report: Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*. “Recommendation 9: A pact should be agreed to ensure no evictions from social housing (or housing supported by the public purse) into homelessness, and increased allocations to homeless households.”

³⁹ Wilcox, S., Perry, J., Stephens, M & Williams, P. (2017) *UK Housing Review 2017*. Coventry: CIH.

Recommendation 7h: Ensure there are local private rented sector access and tenancy sustainment schemes to support landlords and tenants, and support the use of the private rented sector to provide housing for people at risk of homelessness, including a national bond scheme, the Welsh private rented sector leasing scheme, and an offer of mental health awareness training for private landlords via Rent Smart Wales.

3.2 Social security as homelessness prevention and tackling poverty

Too many people in Wales are under constant pressure and forced into impossible decisions about how to pay for their housing, basic needs, and bills. When this pressure becomes too high, people can be pushed into housing stress and poverty that can lead to homelessness. Most elements of welfare policy are set by the UK Government and the provision of timely and adequate benefit, such as housing benefit, is a crucial tool to relieve the pressure households experience.

We agree with the chair of the National Assembly for Wales' Equality, Local Government and Communities Committee, who said:

*"The current system is currently not working for far too many people. We repeatedly hear that benefits are not enough to cover basic and essential household costs, and the system does not treat people with dignity, fairness or compassion. The human cost of these failures is unacceptable, in one of the world's largest national economies."*⁴⁰

Recommendation 8a: The Welsh Government must make the case to the UK Government for:

- **Local Housing Allowance rates at the 30th percentile of local markets, to make sure that payments cover the cost of private renting**
- **Removal of the benefit cap and the 'bedroom tax'**
- **Removal of the restricted rate for under-35s in the private rented sector**
- **Measures to ensure Universal Credit is fully accessible and provides support for people when they need it, including an end to the five-week waiting period from application point to receiving Universal Credit.**
- **Specialist homelessness support provision in all Job Centres Plus.**

3.3 Welfare benefits currently devolved to Wales

We note that the Assembly committee report on benefits in Wales puts forward a number of options for further devolution and reforms to the administration of benefits

⁴⁰ Welsh Assembly (2019) Quote from committee chair John Griffiths AM, accessed 20 January 2020 on <http://senedd.assembly.wales/mglIssueHistoryHome.aspx?lId=23649>

in Wales.⁴¹ The Homelessness Action Group did not wish to take a view on political questions about how to deliver against these issues, and which governments should be responsible, but instead draws attention to the potential of the welfare system as a universal homelessness prevention tool. Whichever Government is making decisions must provide people at risk of homelessness – or people already experiencing it – in Wales the financial, practical, health and wellbeing support they need.

The majority of the welfare system is non-devolved but a range of welfare benefits and support are devolved and managed by the Welsh Government or local authorities. For some of these, budget setting, rules and administrative arrangements are all determined by the Welsh Government. For others, overall rules and budgets are set by UK Government departments but administration arrangements are decided within Wales.

The Bevan Foundation and Joseph Rowntree Foundation are currently undertaking a project looking at support schemes for low income families in Wales (the 'Welsh benefits system'), scoping and analysing what is available in a number of areas, including housing and will make recommendations for how these schemes might be better deployed.⁴² All of these measures could strengthen welfare policy in Wales and mitigate the pressures households experience that can lead to homelessness.

The most significant support schemes related to ending homelessness are Discretionary Housing Payments (DHPs) and the Discretionary Assistance Fund. Other schemes, particularly the Council Tax Reduction Scheme (CTRS), are vital in helping people pay bills. When people move onto or apply for Universal Credit, they have to make a separate application for the CTRS. There is evidence that instead of receiving support people are ending up with council tax debt.

There is significant variation in the administration of Discretionary Housing Payments (DHPs) between local authorities, including the extent to which they are used for homelessness prevention. They are essentially a 'top up' or crisis fund that cannot deal with root causes of homelessness but can relieve some of the pressures that people experience. Given it is a crisis fund it should be able to be accessed quickly and easily but there is evidence that this is not always the case. There is also an issue with the use of the DHP budget (around £9m), where a significant number of people are receiving DHPs because they are subject to the 'bedroom tax', leaving less for crisis prevention and making it difficult for the private rented sector to be a more affordable option.⁴³

⁴¹ Welsh Assembly (2019) Equality, Local Government and Communities Committee report - *Benefits in Wales: options for better delivery*. October 2019

⁴² Bevan Foundation (2020) *The case for a Welsh Benefits System*. Available on <https://41ydv1cuyvlonsm03mpf21pub-wpengine.netdna-ssl.com/wp-content/uploads/2020/02/Case-for-Welsh-Bens-Report-2.pdf>

⁴³ UK Government (2019) Use of Discretionary Housing Payments: financial year 2018 to 2019 (last updated 14 August 2019). Accessed 4 February 2020 on <https://www.gov.uk/government/statistics/use-of-discretionary-housing-payments-financial-year-2018-to-2019>

In total, local authorities are allowed to spend 2.5 times on DHPs what they receive from the UK Department for Work and Pensions.⁴⁴ While most Welsh local authorities spend their DHP budget, a small number have allocated much more than their allocation, with 135 per cent being the highest in 2018-19.⁴⁵ The Welsh Government could take similar action to the Scottish Government by topping up the DHP budget to the maximum permitted and consider pushing for full devolution of the DHP budget, as recommended by the recent National Assembly for Wales committee inquiry into benefits.⁴⁶

Recommendation 8b: Pending any change in housing and welfare policy by the UK Government, the Welsh Government must use its existing powers to come up with a strategic approach to the ‘Welsh benefits system’, making best use of the range of funds available to advance the Welsh Government’s policy objectives and relieve pressures on households and individuals, including:

- **Topping-up the Discretionary Housing Payment (DHP) budget and link an increased budget to homelessness prevention work, including no evictions into homelessness.**
- **Working with local authorities to simplify and speed up the application process for DHPs, achieve more consistent administration, and examine how DHPs are used to support targeted, crisis and recovery prevention, and how an application for DHPs can trigger forms of support from other public services. As part of this consider pushing for full devolution of DHPs to Wales.**
- **Considering the role of the Discretionary Assistance Fund in the prevention of homelessness, in particular supporting people to set up a home and establish sustainable tenancies.**
- **Finding ways to increase take up of the Council Tax Reduction Scheme (CTRS).**

3.4 Early life experiences and trauma (children and young adults)

Child poverty and adverse childhood experiences (ACEs) are extremely strong indicators of future homelessness. Public Health Wales research said: “ACEs are stressful experiences occurring during childhood that directly harm a child (e.g. sexual or physical abuse) or affect the environment in which they live (e.g. growing

⁴⁴ National Assembly for Wales (2019) Equality, Local Government and Communities Committee – Benefits in Wales: options for better delivery. Accessed 3 February 2020 on <https://www.assembly.wales/laid%20documents/cr-ld12832/cr-ld12832%20-e.pdf>

⁴⁵ UK Government (2019) Use of Discretionary Housing Payments: financial year 2018 to 2019 (last updated 14 August 2019). Accessed 4 February 2020 on <https://www.gov.uk/government/statistics/use-of-discretionary-housing-payments-financial-year-2018-to-2019>

⁴⁶ Welsh Assembly (2019) - Equality, Local Government and Communities Committee report. *Benefits in Wales: options for better delivery*. October 2019

up in a house with domestic violence).⁴⁷ Further research found almost one in every 14 (7%) of the Welsh adult population has reported experience of homelessness. People who reported having four or more adverse childhood experiences were 16 times more likely to report experience of homelessness. One respondent in the report said:⁴⁸

“Everyone has got so many different complex needs. I was very dismissive of, when I was growing up, you’d see someone rough sleeping, and you’d walk by and you’d think well, it’s their fault. And having gone through it, and seeing what’s gone on in the past with my life, it’s not, you know.”

The research also found that belonging to a community, having a trusted relationship with a ‘stable adult’, and supportive teachers helped them to cope. Barriers to support included “not being listened to, fear of the consequences, lack of trust, [other people] not seeing the person behind the presenting behaviour, and the child not recognising their experiences as adversity”.⁴⁹

While these issues are linked to homelessness and vulnerability they need a much more universal, general approach in Welsh services. Current Welsh policy on adverse childhood experiences and commitments to end youth homelessness are a helpful starting point but for homelessness prevention they need to be scaled-up. The importance of the following recommendations in this section cannot be overstated in helping to bring about a long-term, sustained approach to ending homelessness. There are good precedents in early support for children, including an emphasis on promoting wellbeing in schools in the forthcoming national curriculum in Wales⁵⁰ and mandatory access to schools-based counselling services and school nurses.

Broader interventions to prevent and address adverse childhood experiences are not yet in place in public services across Wales but they must be informed by evidence of what works, translated into practical work to put support in place both to prevent adverse childhood experiences in the first place and support children and young people and adults who have experienced them.

Homelessness services and other public services should not simply ‘count ACEs’, which risks further stigma for people who already face prejudice and are marginalised by society. The Children’s Commissioner for Wales has also emphasised the need to avoid labelling or establishing thresholds for support that

⁴⁷ Bellis, M. A., Ashton, K., Hughes, K., Ford, K., Bishop, J., & Paranjothy, S. (2015) *Welsh Adverse Childhood Experiences (ACE) Study: Adverse childhood experiences and their impact on health-harming behaviours in the Welsh adult population*. Cardiff: Public Health Wales, p.4

⁴⁸ Grey, C.N.B. and Woodfine, L. (2019) *Voices of those with lived experiences of homelessness and adversity in Wales: informing prevention and response*. Cardiff: Public Health Wales NHS Trust, p.4

⁴⁹ Grey and Woodfine, p.5

⁵⁰ Welsh Government and Education Wales (2019) *Draft Curriculum for Wales 2022 (April 2019): Health and Well-being*.

exclude people from support.⁵¹ Instead, organisations should bring about a trauma-informed approach throughout all of their services (as recommended previously in this report), which ensures that people who have experienced trauma receive the best possible support, regardless of whether this trauma is known from the outset.

Recommendation 9: The Welsh Government should revisit and revise child poverty targets and examine the impact of the socio-economic duty on child poverty, to ensure Wales takes all the necessary steps needed to reduce and eradicate child poverty. This should also include a review of existing spending and partnership approaches, particularly greater involvement in identifying and addressing housing issues through workforces in early years, Families First, teams around the family, and Flying Start.

Recommendation 10: We recommend that there is strategic alignment between the Ending Homelessness Framework and the Delivery Plan for the Adverse Childhood Experience Support Hub 2020-2021, to identify and maximise any opportunities to prevent homelessness.

Recommendation 11: The Welsh Government and relevant public services should institute a child's right to be noticed and have adverse experiences identified and appropriately responded to, building on the Rights of Children and Young Persons (Wales) Measure 2011, bids for child-friendly cities, and the focus on supporting the first 1,000 days of a child's life.

3.5 Communication about homelessness and poverty to support change

Our previous report considered polling evidence from winter 2018 that suggested a majority of adults across Wales (59%) and Britain as a whole did not know what to do when they see someone who is homeless.⁵² This lack of clarity comes from mixed messages about homelessness from media, governments, charities, businesses and wider society.⁵³ Research finds the current discussions do not help end homelessness and need to change to include:⁵⁴

- A wider range of stories about experiences of homelessness, covering the full range of 'core homelessness' forms and not only more visible forms, such as rough sleeping.

⁵¹ Children's Commissioner for Wales (2018) Policy position paper on ACEs. Accessed 27 January 2020 on <https://www.childcomwales.org.uk/wp-content/uploads/2018/10/ACEs-Position-Paper-CCFW-Sally-Holland.pdf>

⁵² YouGov Plc (2018) Total sample size was 2,031 adults. Fieldwork was undertaken between 14th - 15th November 2018. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+). Question: To what extent do you agree or disagree with each of the following statements? Statement: "I don't usually know what I should do to help when I see someone who is homeless"

⁵³ O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. FrameWorks Institute.

⁵⁴ Nichols, J., Volmert, A., Busso, D., Gerstein Pineau, M., O'Neil, M. and Kendall-Taylor, N. (2018) *Reframing Homelessness in the United Kingdom: A FrameWorks MessageMemo*. FrameWorks Institute.

- More inclusive language to encourage a compassionate and evidence-based response to homelessness. The current use of language creates distance and ‘othering’ of people experiencing homelessness (e.g. ‘the homeless’), linked to narrow responses out of pity or hostility to individuals that adds to the stigma, isolation and shame that people experience.
- More discussion on the systemic changes needed to end homelessness and a move away from the overly strong focus on individuals’ experiences. This can lead to solutions focused on individual behaviour rather than addressing the drivers of homelessness.
- More stories on what worked to end homelessness, showing that homelessness can be ended and encouraging a solutions-focused debate on homelessness.

There are examples of good practice, however. The recent ‘hidden homelessness’ campaign from the Welsh Government and Shelter Cymru is a good example of a wider story on homelessness that uses the ‘core homelessness’ definition with a call to action for people to ask for help. The Homeless World Cup 2019 in Cardiff put forward a range of options for specific audiences on how they can help end homelessness, informed by the research on communication, and this approach should be continued as a legacy project from the event.

Another example, from a different policy area, is the Time to Change Wales campaign, which aims to reduce the stigma and discrimination experienced by people with mental health problems.⁵⁵ Initially funded by the Welsh Government, Big Lottery and Comic Relief, it used a number of approaches to change attitudes, including social marketing campaigns that reached large numbers of people, support for businesses to tackle stigma in their organisations and local communities, and training for people with lived experience to become champions and deliver anti-stigma talks across Wales.

Recommendation 12a: Public services should take a lead in reframing communication on homelessness, drawing from evidence on framing homelessness, framing poverty⁵⁶ and learning from the Homeless World Cup 2019.

Recommendation 12b: The Welsh Government should fund and actively support an ongoing public awareness campaign about homelessness to increase understanding and reduce stigma about homelessness in Wales, learning from the Time to Change Wales campaign and the Homeless World Cup. These approaches should be quickly reviewed and insights from them adopted for wider and ongoing public perceptions communication, and tailored with calls to action for specific audiences (such as the public, businesses, charities, public services, political leaders and government).

⁵⁵ For more information: <https://www.timetochangewales.org.uk/en/about/>

⁵⁶ Joseph Rowntree Foundation (2019) Framing toolkit: Talking about poverty. Accessed 20 January 2020 on <https://www.jrf.org.uk/report/framing-toolkit-talking-about-poverty>

4.0 Making homelessness rare through Targeted Prevention (Secondary Prevention)

Targeted homelessness prevention means preventing homelessness at an earlier stage than the statutory point of risk (i.e. at 56-days before someone might lose their home) and with a particular focus on helping people proven to be at greater risk. The work to establish the statutory duties in the Housing Act 2014 on local authorities has been a success. However, the numbers of households threatened with homelessness in the first place is increasing and therefore Wales must step up efforts to make homelessness rarer before people even get to the point of needing statutory help from their local authority.⁵⁷

4.1 Public services organisation and arrangements for preventing homelessness

A key feature of more 'upstream' homelessness prevention is that wider public services beyond housing often come into contact with people at risk *before* services in housing and homelessness.⁵⁸ This offers the chance to prevent homelessness at a much earlier stage, before people experience significant harm or crisis. The cost of addressing crises can be significant. One estimate found, for example, that the cost of a person rough sleeping for 12 months was more than £20,000 but the cost of a successful intervention was around £1,400.⁵⁹

To bring about the approach needed to do this, Wales needs to establish:

- A cultural and practical change towards a stronger sense of ownership across public services for rehousing people and homelessness, making the idea of 'homelessness as a public services issue and not just a housing issue' a reality.⁶⁰
- Use of evidence to target prevention at a much earlier stage for people most at risk of homelessness, with leadership, outcome setting, and useful data the starting point; followed by evidence-based action across services to prevent and rapidly respond to homelessness; and regional and local partnerships to deliver this.
- Agreed outcomes to end homelessness (e.g. prevention at earlier stages; and rapid rehousing).

⁵⁷ Welsh Government (2019) *Homelessness in Wales, 2018-19*. Accessed 15 January 2020 from <https://gov.wales/sites/default/files/statistics-and-research/2019-07/homelessness-april-2018-march-2019-993.pdf>

⁵⁸ Fitzpatrick, S., Bramley, G. & Johnsen, S. (2013) 'Pathways into multiple exclusion homelessness in seven UK cities', *Urban Studies*, 50(1): 148-168

⁵⁹ Pleace, N. (2015) *At what cost? An estimation of the financial cost of single homelessness in the UK*. London: Crisis

⁶⁰ The next phase of the Action Group after this report will be to answer the remaining two questions, which are very relevant to this issue: How do we put the delivery of rapid and permanent rehousing at the heart of preventing, tackling and ending homelessness? And how can we ensure joined-up local partnerships and plans are put in place to prevent, tackle and end homelessness throughout Wales?

A key part of delivering this approach is making sure the ending homelessness outcomes can be delivered in specific geographic areas, supported by planning, commissioning and budgeting across health, housing (including supply of social housing), social care, education and youth services, homelessness services, and employment/employability.

While the Action Group makes an overall recommendation in this report, we will provide more detail as part of our work on scaling-up rapid rehousing and making sure local/regional partnerships can work to end homelessness. The Housing Support Grant guidance to local authorities on preventing homelessness provides a strong starting point for planning and strategy, and for regional working.⁶¹

Recommendation 13: Welsh Government and its partners should lead a change in public services to ensure homelessness is prevented before crisis stage (i.e. before the current statutory definition of 56 days). This approach should include:

- **The ending homelessness outcomes framework with the data needed to monitor and evaluate progress, with accountability and potential regulation.**
- **Strategic support for the workforce to deliver against the outcomes framework in a trauma-informed way.**
- **Making sure that local, regional and national strategy-making, planning and commissioning/budgeting processes can deliver against the outcomes framework to make homelessness rare, brief and non-repeated and to ensure the housing supply and support needed to achieve this.**
- **Welsh Government leadership, including relevant Cabinet members and leads from local authorities, health boards and other public services.**
- **A focus on evidence.**
- **Regional and local partnerships.**

4.2 Identify early and target homelessness prevention

Moving homelessness prevention ‘upstream’ must cover groups of people proven to be at higher risk, such as vulnerable young people and people approaching transitions, such as leaving local authority care, prison or mental health in-patient treatment.⁶²

In the Action Group’s last report on ending rough sleeping, we recommended a ‘no wrong door’ approach for people at risk of homelessness, meaning that people

⁶¹ Welsh Government (2020) *Housing Support Grant Guidance – Practice Guidance for Local Authorities*. Accessed 11 February 2020 on <https://gov.wales/sites/default/files/publications/2020-02/housing-support-grant-practice-guidance.pdf>

⁶² Fitzpatrick, S., Mackie, P., and Wood, J. (2019) *Homelessness Prevention in the UK – Policy Briefing*, p.3

should be helped to avoid or resolve homelessness regardless of where they first presented as in need of support. This is an important principle for helping at-risk groups of people, so that public services can respond as soon as they identify risk.

As well as generic approaches to this, there will need to be very specific adjustments to the approach for groups of people and for individuals to meet their needs. This would include flexibility within the agreed pathways for support. We have put forward a grid in Annex 4 to map groups of people at risk, different types of interventions, and specific examples of interventions for groups of people at risk.

Recommendation 14a: Welsh Government, delivery partners and public services should agree and implement clear prevention and rapid rehousing pathways of tailored support for people in the following risk groups:

- **People leaving prison/the secure estate or in contact with a youth offending team**, particularly around the point of release/discharge.⁶³
- **Young people experiencing homelessness.** Youth homelessness is distinct and requires distinct solutions, given young people undergo a key series of transitions into adult services that can be points of high risk of disengagement and homelessness. There are opportunities to work at an earlier stage to prevent homelessness, including enabling people to remain in their family home with family mediation support when it is safe and appropriate for the young person.⁶⁴ The Action Group consultation with people who have lived experience of homelessness found that young people and care experienced young people wanted to see more support to help people become 'rent ready', e.g. learning how to budget and manage finances, independent living skills (such as washing and cooking), and how to deal with housing costs and availability. This support could take the form of life-skills teaching in schools and colleges.
- **Care experienced young people** who are extremely vulnerable to the risk of homelessness. There is an estimate that one-third of young people leaving care became homeless within two years; and one in four people who are single and homeless have been in care at some point in their lives.⁶⁵
- **People with physical or mental health problems or learning disabilities.**⁶⁶

⁶³ Ministry of Justice (2010) *Compendium of reoffending statistics and analysis*. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/199224/compendium-of-reoffendingstatistics-and-analysis.pdf

⁶⁴ Quilgars, D., Fitzpatrick, S., & Pleace, N. (2011) *Ending youth homelessness: Possibilities, challenges and practical solutions*. York, UK: Centre for Housing Policy, University of York & School of the Built Environment, Heriot-Watt University. Accessed on 12 February 2020 on <https://pdfs.semanticscholar.org/c251/5a5d8ac2f57f32d7666c65e4d5b45d9191c7.pdf>

⁶⁵ All-Party Parliamentary Group for Ending Homelessness (2017) *Homelessness prevention for care leavers, prison leavers and survivors of domestic violence*. Accessed from: https://www.crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf

⁶⁶ Cymorth Cymru (2017) *Health Matters*. Accessed 15 January 2020 from https://www.cymorthcymru.org.uk/files/1515/0108/8821/Cymorth_Cymru_Health_Matters_report.pdf

- **Children and young people in schools and education settings.** There is evidence children and young people can be assessed for vulnerability and offered support.⁶⁷
- **People with drug and/or alcohol problems,** both as an immediate cause of losing a home and in the many cases where these problems arise when someone tries to cope with the trauma of becoming homeless.⁶⁸
- **People experiencing violence (against women and other people), domestic abuse, and sexual violence – and survivors of these experiences.**⁶⁹ This also includes helping people who are vulnerable to exploitation, e.g. people vulnerable to ‘sex for rent/house repairs’ offences committed against them. There is a need to make sure people in this situation are supported, including with housing/rehousing and emergency accommodation to enable people to leave violent or abusive relationships. This includes an effective response to the Wales Audit Office’s recommendations about the Violence Against Women, Domestic Abuse, and Sexual Violence Act.⁷⁰
- **LGBTQ+ people,** who are overrepresented in the wider population of people who are homeless. Due to the realities of being LGBTQ+ in society people can be at greater risk of abuse and can experience family breakdown.⁷¹
- **Refugees, asylum seekers and people with no recourse to public funds,** for whom extra pressures and rules make it harder or impossible to access support for housing, job opportunities, and benefits support.⁷²
- **People presenting to a Jobcentre Plus for advice and support.**⁷³
- **People experiencing rent/tenancy difficulties,** which were leading causes of people being threatened with homelessness according to Welsh Government figures. In 2018-19, 32 per cent of people were threatened with homelessness due to loss of rented accommodation; and 15 per cent due to rent arrears in social or private rented accommodation.⁷⁴

⁶⁷ Mackenzie, D., & Thielking, M. (2013) *The Geelong Project: A community of schools and youth services model for early intervention*. Melbourne: Swinburne Institute for Social Research, Swinburne University.

⁶⁸ Cymorth Cymru (2017) *Health Matters*

⁶⁹ Mackie, P. and Thomas, I. (2014) *Nations Apart? Experiences of single homeless people across Great Britain*, London: Crisis. https://www.crisis.org.uk/media/20608/crisis_nations_apart_2014.pdf

⁷⁰ Wales Audit Office (2019) Progress in implementing the Violence Against Women, Domestic Abuse and Sexual Violence Act. Accessed 13 February 2020 on https://www.audit.wales/system/files/publications/VAWDASV_eng.pdf

⁷¹ End Youth Homelessness Cymru (2019) *Out on the Streets - LGBTQ+ Youth Homelessness in Wales: Full Report*. August 2019.

⁷² Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home for All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

⁷³ Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis, p.267

⁷⁴ StatsWales (2019) Households found to be threatened with homelessness during the year. Main reason for being threatened with homelessness by type of household (Section 66). 2018-19 figures, updated on 25 July 2019 and accessed on 20 January 2020.

- **People experiencing relationship breakdown or difficulties, or bereavement.** For people threatened with or experiencing homelessness in Wales in recent years, a lack of willingness of a friend/relative/parent to accommodate and relationship breakdown accounted for one in three people seeking help at crisis point from the local authority.⁷⁵
- **People leaving the armed forces,** although in recent years there has been considerable success in supporting more people to be housed.⁷⁶

Some of the interventions needed already exist nationally and some partially exist, either in specific areas of Wales or for some at-risk groups. While the mix and scale of interventions will need to reflect local and regional need public services should consider what interventions are in place for each of the groups listed above and whether gaps in interventions for specific groups need to be filled.

While not exhaustive, nor a 'tick box' list, here are examples of typical interventions that might be needed for each group of people at risk:

- **Accessible information and advice:** This might include ensuring that information is available in a more accessible format or in specific locations, such as in prisons, mental health wards, youth centres or through phone lines like Live Fear Free or CALL (the Community Advice and Listening Line). Provision should be made with reference to the work of the National Advice Network in Wales and the existing information and advice action plan.⁷⁷
- **Advocacy and peer support:** Some of the groups at particular risk of homelessness are also the most marginalised and are likely to benefit from advocacy or peer support services to help get the support they need.
- **Appropriate housing solutions:** This might be the provision of different or innovative housing solutions to meet the universal need for stable and safe housing but for particular groups, such as young people, or models such as Housing First for people with co-occurring mental health and substance use issues.
- **Rapid and timely access to mental health support.** Both people working in housing and homelessness and people with lived experience mentioned this as a priority for improvement. This could include timely access to mental health support for young people at risk of homelessness, dedicated mental health support within supported accommodation settings, a strategic commitment to facilitating immediate access to mental health services for people with co-occurring issues in Housing First schemes, incorporating mental health specialists within assertive outreach teams, providing trauma informed mental health support for people

⁷⁵ Welsh Government (2019) *Homelessness in Wales, 2018-19*. Accessed 15 January 2020 from <https://gov.wales/sites/default/files/statistics-and-research/2019-07/homelessness-april-2018-march-2019-993.pdf>

⁷⁶ Mackie, P. K., & Thomas, I. (2014). *Nations apart? Experiences of single homelessness across Great Britain*. Crisis.

⁷⁷ Welsh Government (2016) *Information and Advice Action Plan*. Accessed 11 February 2020 in <https://gov.wales/sites/default/files/publications/2018-11/information-and-advice-action-plan.pdf>

fleeing violence and abuse, or providing specific mental health support to people leaving care, prison or the armed forces.

- **Co-location:** This could be housing staff on mental health wards or in prisons, or mental health professionals within housing departments, ensuring people receive holistic advice and support that prevents homelessness.
- **Critical Time Interventions:** A time-limited case management model for groups identified as being at particular risk of homelessness, such as people transitioning out of public institutions, e.g. prison or hospital.⁷⁸
- **Information and data sharing:** Many of the groups at particular risk of homelessness are in contact with public services outside housing, and would benefit from effective information sharing between agencies, which could provide a more joined up, holistic approach and prevent homelessness.
- **Policy and legal frameworks:** Ensuring clarity on how public bodies interpret and use policy and legal frameworks for groups particularly at risk of homelessness, such as Section 60 of the Housing (Wales) Act 2014 (duty to provide information, advice and assistance in accessing help). The Welsh Government is currently revising the homelessness code of guidance, which is an opportunity to ensure national clarity for localities and regions, and it should consider further changes to policy and legal frameworks in response to this report.
- **Pathways and protocols:** A number of pathways already exist, such as the pathway for prison leavers and the pathway for young people. However, they must be implemented at scale across Wales and there might need to be additional pathways or protocols (or revisions to existing ones) to ensure they deliver maximum prevention and rapid rehousing for people.
- **Staff training and skills:** This could include specialist homelessness training for staff working in hospitals, prisons or other services where people are at a higher risk of homelessness. Conversely, it could include specialist training for housing and homelessness staff in areas such as recognising violence against women, domestic abuse and sexual violence and responding to it; mental health; learning disabilities etc. It could also include increasing awareness and understanding of the characteristics and experiences of groups of people to reduce discrimination against them.
- **Systems for early identification:** Systems in place to identify people at risk of homelessness much earlier on, which results in referrals leading to support that prevents homelessness, such as school screening systems, custody screening, health settings, job centres, or protocols for private landlords to flag people at risk.
- **Technology and predictive analytics:** Consideration of how technology and data can be used more effectively to model the relative risk of homelessness, understand what works at a general level, and also potentially to help flag individuals at risk and ensure they are offered advice and support to help prevent homelessness. Welsh Government and its partners can work with Public Health Wales, academic institutions, and the UK Office for National Statistics to take this work forward.

⁷⁸ For more information see: <https://www.criticaltime.org/wp-content/uploads/2009/04/cti-handout4.pdf>
Critical time interventions will be covered in more detail in the Action Group's future work on rapid rehousing.

Annex 4 shows the at-risk groups and potential interventions in a grid form, so that public services can assess which interventions exist for which groups in their local authority area of region – and identify the gaps that need filling to ensure that all groups at particular risk of homelessness do not see this become a reality.

Recommendation 14b: Public services should demonstrate that they are providing the appropriate mix of interventions to ensure maximum prevention and rapid rehousing for all the target groups at particular risk of homelessness.

4.3 Housing people after discharge

In the Action Group's last report on preventing rough sleeping we recognised the higher prevalence of homelessness among people who have been discharged from a public service or institution; and also the number of people who were evicted into homelessness.⁷⁹

There are specific changes Wales should make to ensure no discharge from any public service into homelessness, with duties of referral and co-operation to reduce the risk of homelessness after discharge from the service and support provided to maintain housing stability.

The overall solution is properly resourced, effectively implemented and regularly reviewed preventative pathways for all in the care or supervision of the state (e.g. armed forces, prison, health, mental health, care system, asylum system etc). All existing pathways should be reviewed and any learning drawn from pathways elsewhere. Critical Time Interventions should be a key element of commissioning and funding public services to ensure risk of homelessness is reduced pre- and post-discharge.

Recommendation 15a: Ensure everyone discharged from a public institution has a suitable sustainable housing solution in place, and implement prevention and rapid rehousing pathways (refining existing pathways if necessary) agreed to support people's housing needs before, during and after they leave the NHS, the care system, or the secure estate. This should be one of the outcomes in the ending homelessness outcomes framework.

Recommendation 15b: The Welsh Government should consider further legal duties for prevention, referral and/or co-operation on public bodies if needed to achieve the goal of zero discharge into homelessness.

⁷⁹ Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*.

5.0 Making homelessness rare through Crisis Prevention (Tertiary Prevention and Acute Spending)

Wales has taken “significant strides forward” in homelessness crisis prevention through the Housing (Wales) Act 2014.⁸⁰ The Act’s duties on local councils to prevent, relieve and (for some people) directly secure accommodation have helped almost 24,000 households avoid becoming homeless since 2015. Success rates have reached a steady level of more than 66 per cent of households seeing homelessness prevented and 40 per cent of households seeing homelessness relieved after experiencing it.⁸¹

Our last report focused on rough sleeping, which is a particular point at which crisis prevention and acute spending on services happens.⁸² The Action Group agrees with the Welsh Government that this part of the system should be the “last line of defence”⁸³ but the framework this report sets out requires more prevention at universal and targeted levels, and a shift towards rapid rehousing for those already experiencing homelessness. Earlier prevention will reduce the need for crisis prevention and reduce the impact of homelessness on individuals and society.

Despite the success in prevention and relief, the number of households threatened with homelessness within 56 days (i.e. needing homelessness crisis prevention help) rose by 18 per cent in 2018-19 compared with the previous year.⁸⁴ Reforms proposed to renting legislation also mean that the standard length of a private rented sector tenancy will increase to six months with a six month notice period, meaning the concept of a 56 day crisis prevention window may no longer be appropriate.⁸⁵

The main principles of the approach we outlined on ending rough sleeping and other forms of homelessness are:

- **A no wrong door, whatever it takes approach:** Public services and partners working together quickly and across service boundaries and professions to help someone away from homelessness as quickly as possible. To do this we need to empower staff, people and services; and remove any barriers that exist.
- And to **promote the culture of cooperation** needed to deliver this approach, through clear outcome setting, funding, training and resources given to

⁸⁰ Fitzpatrick, S., Mackie, P., and Wood, J. (2019) *Homelessness Prevention in the UK – Policy Briefing*, p.4

⁸¹ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*

⁸² Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*

⁸³ Welsh Government (2019) *Strategy for Preventing and Ending Homelessness*

⁸⁴ Welsh Government (2019) Homelessness in Wales, 2018-19. Accessed 16 January 2020 from <https://gov.wales/sites/default/files/statistics-and-research/2019-07/homelessness-april-2018-march-2019-993.pdf>

⁸⁵ Welsh Government (2019) Increasing the minimum notice period for a ‘no fault eviction’. Accessed on 16 January 2020 from https://gov.wales/sites/default/files/consultations/2019-08/consultation-increasing-the-minimum-notice-period-for-a-no-fault-eviction_2.pdf

services to meet these outcomes, and ongoing support for the wider workforce. We welcome plans to remove barriers to joint work between housing/homeless services and mental health and substance use services, as set out in Welsh Government delivery plans on mental health and on substance misuse.⁸⁶

5.1 No wrong door, whatever it takes approach

One of the goals of the framework for ending homelessness is that people are helped away from homelessness and into settled housing as early as possible. This will require a new set of interventions to complement existing crisis prevention.

The aim should be to ensure all relevant public bodies (and associated bodies, such as housing associations, primary healthcare, secondary healthcare, social services and charities commissioned to deliver public contracts) take all reasonable steps to prevent homelessness and to cooperate with local housing authorities in relieving homelessness.⁸⁷

We heard at our consultation events about health action plans for homeless people and vulnerable groups (also known by the acronym HAVGHAPs) but concerns that the action plans should be rejuvenated. Many of the key areas of the plans are relevant to this ending homelessness framework, including leadership, joint working, and access to healthcare.⁸⁸

The Action Group encourages the Welsh Government to extend prevention and relief duties onto wider public bodies. As well as this the Welsh Government should consider placing a 'duty to prevent' on wider public bodies, where someone is at clear risk of homelessness, to help create a multi-agency response. In safeguarding the concept of an after-event 'serious case review' is well established and this process could draw learning from it and adapt a process that can happen in advance of someone becoming homeless.

In our report on preventing and ending rough sleeping we noted the need to address the barriers and misunderstandings that stop people at risk of homelessness or who are rough sleeping from accessing adequate housing and support. These include priority need, intentionality tests, local connection, and police use of the Vagrancy Act.⁸⁹ We also made recommendations in the last report, adopted in this report, to

⁸⁶ Welsh Government (2019) Together for Mental Health, Delivery Plan: 2019-22 from <https://gov.wales/sites/default/files/publications/2020-01/together-for-mental-health-delivery-plan-2019-to-2022.pdf> and Substance misuse delivery plan: 2019 to 2022 <https://gov.wales/substance-misuse-delivery-plan-2019-2022-0>

⁸⁷ This approach is currently being developed by an expert panel for the Scottish Government, following a similar recommendation from the Homelessness and Rough Sleeping Action Group (HARSAG)

⁸⁸ Cymorth (2017) Health Matters – the health needs of homeless people in Wales, Cardiff: Cymorth. Available on https://www.cymorthcymru.org.uk/files/1515/0108/8821/Cymorth_Cymru_Health_Matters_report.pdf

⁸⁹ Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*. "Recommendation 10: Remove the barriers and address misunderstandings that stop

make rapid rehousing the default approach for people who are at imminent risk of homelessness.⁹⁰ In the meantime, before priority need is removed, there is a need to ensure more groups are in priority need, e.g. extending priority need to all forms of violence against women, domestic abuse, and sexual violence; and ensuring local authorities can take an inclusive approach to support all people until priority need is removed.

Recommendation 16: Where people are identified as being at risk of homelessness, and ultimately rough sleeping, there needs to be a ‘no wrong door’ approach to action and referral to housing support as a minimum. The Welsh Government should:

- **Extend the definition of ‘at risk’ from 56 days to six months for all public services.⁹¹**
- **Extend the duties to prevent and relieve to wider public bodies beyond housing.**
- **Implement the recommendation from our rough sleeping report to remove barriers and address misunderstandings that currently stop people accessing housing and support, including priority need, intentionality and local connection tests, and the Vagrancy Act. Replace these with actions to end homelessness as recommended in the Action Group’s framework for ending homelessness (i.e. a right to adequate housing, maximum prevention, and rapid rehousing for those experiencing homelessness).⁹²**

5.2 Helping people who use substances

The existing approach to people who use substances needs to change because there is growing evidence from across Europe that shows there are other ways to address the societal harms of problematic substance use in communities. Different approaches include de-criminalisation.⁹³ Section 8 of the Misuse of Drugs Act (1974) places undue strain on landlords to ensure that their premises are not used

people at risk of homelessness or who are rough sleeping from accessing the basic human need for adequate housing and support.”

⁹⁰ Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*: “Recommendation 8: Tenancy sustainment and rapid rehousing (including Housing First where appropriate) should be the default approach to support people who are at risk of homelessness or rough sleeping and brought about through a rapid rehousing transition process.”

⁹¹ Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*: “Recommendation 7: Where people are identified as being at risk of homelessness, and ultimately rough sleeping, there needs to be a ‘no wrong door’ approach to action (and referral to housing support as a minimum).”

⁹² Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*: “Recommendation 8: Tenancy sustainment and rapid rehousing (including Housing First where appropriate) should be the default approach to support people who are at risk of homelessness or rough sleeping and brought about through a rapid rehousing transition process.”

⁹³ Hughes, C., Stevens, A., Hulme, S., & Cassidy, R. Models for the decriminalisation, depenalisation and diversion of illicit drug possession: An international realist review (2019) *International Journal of Drug Policy*. <http://harmreductioneurasia.org/wp-content/uploads/2019/07/Hughes-et-al-ISSDP-2019-Models-for-the-decriminalisation-depenalisation-and-diversion-of-illicit-drug-possession-FINAL.pdf>

for the purposes of illicit drug use. This directly undermines the recommendations in the Housing First guidance and increases risk of homelessness instead of promoting harm reduction and long-term recovery. We note the Welsh Government and Housing First partners, including police forces and Police and Crime Commissioners, are working to provide reassurance to landlords.⁹⁴

The ‘no wrong door, whatever it takes’ approach also needs to include measures to support adults experiencing mental and physical health problems, addictions, and acute trauma and to promote a harm reduction approach for people who use substances. As our last report noted:

“There is an urgent need to stop deaths among people who are homeless. The latest Office for National Statistics data found deaths had increased substantially in Wales (and England) and that a “key driver” for this was drug-related deaths.”⁹⁵

While the Welsh Government says it treats addiction as a “health and care issue as opposed to one that is solely related to criminal justice”, there is a need to bring this approach into practice.⁹⁶ The Action Group notes the evidence on the effectiveness of enhanced harm reduction centres (also known as ‘supervised drug consumption rooms’ or ‘medically supervised injection facilities’) to provide hygienic spaces, sterile equipment, emergency care, and referral to drug treatment, counselling and health and social care services. The Welsh Government’s Advisory Panel on Substance Misuse says that all reviews show evidence for their effectiveness, especially in reducing drug-related harm.⁹⁷ The UK Government’s Advisory Council on the Misuse of Drugs said these facilities have been estimated to save more money than they cost, due to reductions in deaths and HIV infections and have not been found to increase injecting, drug use or local crime rates.⁹⁸ The health and social services partnership in Glasgow commissioned a business case for an enhanced harm reduction approach, which showed it would improve health outcomes and contribute to financial savings.⁹⁹

⁹⁴ National Assembly for Wales (2020) Written response by the Welsh Government to the report of the Equality, Local Government and Communities Committee entitled Rough sleeping follow up: Mental health and substance misuse. Accessed 7 February 2020 on <https://www.cynulliad.cymru/laid%20documents/gen-ld12307/gen-ld12307%20-e.pdf>

⁹⁵ Office for National Statistics (2019) Deaths of homeless people in England and Wales: 2018. Published 1 October 2019.

⁹⁶ National Assembly for Wales (2020) Written response by the Welsh Government to the report of the Equality, Local Government and Communities Committee entitled Rough sleeping follow up: Mental health and substance misuse.

⁹⁷ Enhanced Harm Reduction Group (2018) Commission on Justice in Wales Call for Evidence 2018 Submission <https://gov.wales/sites/default/files/publications/2018-08/Submission-enhanced-harm-reduction-group-for-wales.pdf>

⁹⁸ ACMD (2016) Reducing Opioid-Related Deaths in the UK. Accessed 16 January 2020 from https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/576560/ACMD-Drug-Related-Deaths-Report-161212.pdf

⁹⁹ NHS Greater Glasgow and Clyde (2017) ‘Safer consumption facility could provide substantial financial gain for services’. Accessed 16 January 2020 from <https://www.nhsggc.org.uk/about-us/media-centre/news/2017/02/safer-consumption-facility-could-provide-substantial-financial-gain/>

ONS data show that Swansea and Neath Port Talbot had the second and third highest rates of drug use deaths in the UK between 2016 and 2018. South Wales Chief Constable, Matt Jukes, believes Wales is an ideal location for piloting this approach, and the North Wales Police and Crime Commissioner, Arfon Jones also supports the harm reduction approach.¹⁰⁰

Recommendation 17a: The Welsh Government should advance the application of an evidence-based harm reduction approach to the management and policing of substance use, including finding a solution to enable the implementation of Enhanced Harm Reduction Facilities. This will require working with the UK Government to make the case for allowing these approaches in the England and Wales legal jurisdiction.

It is currently not illegal to prescribe medical-grade heroin in the UK and the use of Heroin Assisted Treatment (HAT) has received positive results in Randomised Controlled Trials.¹⁰¹ In most cases where this approach is effective, all former attempts at treatment have been unsuccessful, including the prescribing of opiate substitutes such as methadone. HAT is deemed suitable for the most entrenched users of heroin and provides respite from withdrawal symptoms (and subsequent offending behaviour to fund the fulfilment of cravings) so that people can address other needs, such as housing. The cohort recommended to receive this intervention is relatively small (2-5% of current users) but the benefits to the community are considerable compared to the costs.¹⁰² Although this most entrenched group is small in number the intensity of resources involved in managing the implications of prolonged chaotic drug use is high.

Recommendation 17b: Welsh Government, Substance Misuse Area Planning Boards, health boards, and local authorities should ensure that Heroin Assisted Treatment is available across Wales.

¹⁰⁰ BBC News website (2020) Anti-drug work 'not making difference needed' in Wales. Accessed 16 January 2020 from <https://www.bbc.co.uk/news/uk-wales-50987013>

¹⁰¹ Demaret, I., Quertemont, E., Litran, G., Magoga, C., Deblire, C., Dubois, N., & Ansseau, M. (2015) Efficacy of heroin-assisted treatment in Belgium: a randomised controlled trial. *European addiction research*, 21(4), 179-187. Doi: 10.1159/000369337

¹⁰² Farrell, M., & Hall, W. (2015) Heroin-assisted treatment: Has a controversial treatment come of age? *British Journal of Psychiatry*, 207(1), 3-4. doi:10.1192/bjp.bp.114.160986

6.0 Making homelessness brief and non-repeated through rapid rehousing

This report has so far considered the measures needed to maximise prevention at every level (universal, targeted and crisis) to make homelessness rarer across Wales. However, we cannot prevent all cases of homelessness, so we need to have a response in place to help people who are already experiencing homelessness. Guidance in Scotland on rapid rehousing said:

“Rapid rehousing is about taking a housing led approach for rehousing people that have experienced homelessness, making sure they reach a settled housing option as quickly as possible rather than staying in temporary accommodation for too long.”¹⁰³

There is a lot of recognition among people with experience of homelessness that a rapid response can help. For example, a person in south Wales said:

“There is a lack of support, which means you can easily become stuck in a system that doesn’t move you forward. However, the rest of society doesn’t realise this. Instead they blame the person rather than the system.”¹⁰⁴

6.1 Current responses for people already experiencing homelessness

Rough sleeping increased by 45 per cent between 2015 and 2018¹⁰⁵ and the latest official homelessness figures for Wales show the numbers of households both in temporary accommodation and specifically in bed and breakfasts is at its highest level since 2015.¹⁰⁶ At the moment, the bulk of investment in Wales for people already experiencing homelessness can be categorised as emergency and recovery prevention: a response to very immediate risk to stop things getting worse. The evidence shows that this approach does little or nothing to prevent problems occurring in the future.¹⁰⁷ ‘Emergency’ and ‘recovery’ prevention includes the provision of emergency and temporary accommodation. These services will be needed in the future, but there should be increasing use of rapid rehousing as the default approach over acute spending.

There has been progress in Wales in recent years in delivering against duties to relieve homelessness or secure accommodation for people experiencing it. There have also been efforts to establish the Housing First approach in some areas. While

¹⁰³ Social Bite (2018) Rapid Rehousing Transition Plans: Guidance for Local Authorities and Partners. Accessed 21 January 2020 on https://social-bite.co.uk/wp-content/uploads/2018/07/Rapid_Rehousing_Guidance1.1.pdf

¹⁰⁴ Uscreates (2018) *The lived experience of homelessness*. London: Crisis and Groundswell.

¹⁰⁵ Welsh Government (2019) National rough sleeping count (two-week estimate), published 21 March 2016 and 5 February 2019. See full releases for more detail due to methodology changes that came into force in 2015

¹⁰⁶ Welsh Government (2019) Homelessness: July to September 2019. Accessed 21 January 2020 on <https://gov.wales/homelessness-july-september-2019>

¹⁰⁷ Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London

the evidence for Housing First is “exceptionally strong” for a housing-related support intervention for rough sleepers it is not a panacea.¹⁰⁸ It is suitable for people with more complex support needs and must be delivered with full fidelity to the model, as the Welsh Government’s guidance sets out.¹⁰⁹ The involvement of other services in delivering support is crucial, and we note the Welsh Government’s Together for Mental Health delivery plan (2019-22) that includes support for people in Housing First tenancies.¹¹⁰

For a broader group of people experiencing homelessness or the threat of it, however, the principle of rapid access to support and (re)housing can happen in different ways. The main features of rapid rehousing approaches are:¹¹¹

- They are a ‘housing-led’ approach that focuses on helping people into permanent accommodation before addressing any other issues they may need support with.
- They have a goal to shorten as much as possible the amount of time a person is homeless.
- They help people who are homeless and have lower or no support needs, and can prevent complex needs or chronic issues from getting worse.
- They are multi-agency with a range of help tailored to people’s needs.
- There are no assessments of ‘housing readiness’ to access accommodation.

The overall solution to this situation is to bring about a rapid rehousing approach, scaling-up investment in this approach as the default option, with emergency and recovery support becoming a smaller feature of the system. The multi-agency nature of support is critical to the success of rapid rehousing. The Action Group’s consultations with people who have experience of homelessness and people who work in housing and homelessness roles found that people wanted improved access to mental health services for people experiencing homelessness.

Recommendation 18: Welsh Government and local authorities should lead a transition in the support system over time to prioritise sustaining tenancies and rapid rehousing (including Housing First where appropriate) as the default approach for people who are at immediate risk of homelessness or are already experiencing it. By the end of a transition period of up to five years, rapid rehousing approaches should be scaled-up and acute spending scaled down but still needed for short-term support and accommodation for a smaller number of people.¹¹²

¹⁰⁸ Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London, p. xi

¹⁰⁹ Welsh Government (2018) *Housing First (HF) – National Principles and Guidance for Wales*

¹¹⁰ Welsh Government (2019) *Together for Mental Health, Delivery Plan: 2019-22*. Available on <https://gov.wales/sites/default/files/publications/2020-01/together-for-mental-health-delivery-plan-2019-to-2022.pdf>

¹¹¹ Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis, p.111

¹¹² Adapted from a recommendation in our previous report. See Annex 2 for more details.

The Welsh Government will need to provide transition support to local authorities for effective transition plans; and continue to provide national leadership on scaling up Housing First in line with the Welsh principles agreed.¹¹³

Local authorities, regional and local planning boards, and support services should each agree a rapid rehousing transition plan (RRTP) to ensure that rapid rehousing and Housing First become default and fundamental parts of the local and regional plan for housing and homelessness. Such an approach is in train in Scotland and Wales can draw learning from progress and guidance there.¹¹⁴ RRTPs are required to ensure an orderly commissioning and decommissioning of services towards a rapid rehousing system. They ensure the process is transparent and strategic.

7.0 Non-UK nationals

Research into homelessness among non-UK nationals highlights that homelessness among people with migrant status has increased across Britain. It also finds that restrictions to benefits support, access to housing, and barriers to employment put people at greater risk of exploitation and make it harder to prevent and end homelessness.¹¹⁵

The Welsh Government has already indicated a policy intention to ensure “fair treatment of every person, especially those who are most marginalised by social systems that prevent people from meeting their basic needs” in its plan to help people who are refugees and asylum seekers.¹¹⁶ Every principle and recommendation in this report should apply to all people who are homeless or at risk of homelessness in Wales, regardless of migration status, as far as this is possible in current UK law. However, these further recommendations are specifically to help people with migrant status and, in some cases, implementation in Wales would require a different approach from the UK Government.

Recommendation 19: Welsh Government should help prevent and end homelessness specifically for people who have migrated to Wales from outside the UK by:

- **Making nationals from the European Economic Area (EEA) with a right to reside eligible for statutory homelessness assistance.**

¹¹³ Social Bite (2018) *Rapid Rehousing Transition Plans: Guidance for Local Authorities and Partners*. Accessed 21 January 2020 on https://social-bite.co.uk/wp-content/uploads/2018/07/Rapid_Rehousing_Guidance1.1.pdf

¹¹⁴ Dunn, L. (2020) *Rapid rehousing transition plans: a Scottish overview*. Crisis. Accessed 17 February 2020 on https://www.crisis.org.uk/media/241640/crisis_rapid-rehousing-report_web_spreads_v2.pdf

¹¹⁵ Boobis, S., Jacob, R., and Sanders, B. (2019) *A Home for All: Understanding Migrant Homelessness in Great Britain*. London: Crisis

¹¹⁶ Welsh Government (2019) *Nation of Sanctuary – Refugee and Asylum Seeker Plan*. Accessed 15 January 2020 from https://gov.wales/sites/default/files/publications/2019-03/nation-of-sanctuary-refugee-and-asylum-seeker-plan_0.pdf

- **Providing guidance to local authorities, clearly setting out the duties owed to migrant households with no recourse to public funds.**
- **Considering how best to grant access to the statutory homelessness system for people with migrant status, in consultation with the UK Government, and alongside access to any other services needed to help end someone's homelessness (e.g. health services, employment support, access to benefits, and drug and alcohol support).**
- **Making available a properly supported and voluntary (in word and spirit) end-to-end reconnection service to enable people to relocate to their country of origin rather than become homeless in Wales, only if this is in their best interests and is their preferred option.**
- **Ensuring availability of short-term, suitable emergency accommodation and independent immigration advice for migrants who are homeless, or at imminent risk of becoming homeless to prevent and end homelessness, drawing from the review, commissioned by the Welsh Government, of accommodation options.**
- **Lobbying the UK Government to make changes to UK law and policy to facilitate better housing-related support for people with migrant status, including extending the move-on period for newly recognised refugees from 28 days to 56 days.**
- **Lobbying the UK Government to allow survivors of VAWDASV (violence against women, domestic abuse and sexual violence) who have no recourse to public funds to access housing and support services.**

Annex 1 – Consultation activity to inform this report

The Action Group ran parallel consultations with people with lived experience of all forms of homelessness, and with people who work in roles to end homelessness, particularly from housing and homelessness backgrounds. We are very grateful to both groups of people for their useful and honest reflections in the surveys and events.

In both consultations, we started broadly with surveys to ask people about their most favoured solutions to homelessness from a longer list of potential solutions. The list was based on evidence of what works and was also mapped against the Action Group's four questions. Wherever possible we mirrored the questions in both sets of surveys to help with any comparisons.

Consultation with people who have experience of homelessness

For the first phase of consultation with people with lived experience, the fieldwork involved surveys on the Survey Monkey platform (in English and in Welsh), launched during the week commencing 16 September 2019 and concluding in the week commencing 7 October 2019. We also facilitated responses in housing options services across Wales and Action Group members and their contacts sent the links to the surveys, and support workers facilitated responses from people with experience of homelessness.

People who took part

- 152 responses from people with lived experience of homelessness, of whom 53 per cent experienced it within the last five years.
- Over 50 per cent of respondents were in 'less stable/secure types of accommodation' (hostel, rehab, temporary accommodation).
- 46 per cent have their 'own home' (owned, private rented or social housing tenancy).

Key findings

- Only 10 per cent of all respondents never worry about their housing situation.
- The first choice solution prioritised was: "We could improve public services so that they are kind, compassionate and treat people with dignity." Second choice solution: "We could change the welfare system so that people can afford to pay their housing and living costs."
- Open question responses focused on increasing affordable and secure housing.

"Make it easier for us to get a place even if it is only for one night off the street, then you can find out what situation [we] are in"

"More compassion, understand the impact on people's mental health! Understand the barriers more. Less barriers takes a huge stress off a homeless person! Often they are made to feel worthless like they don't matter!"

"Accommodation with a homely feel"

The second phase of the consultation is outlined in Annexes 5a and 5b.

Consultation with people who work to end homelessness

The approach for people who work in housing and homelessness involved online surveys, followed by face to face events/meetings that are included in the list below.

People who took part

- Survey Monkey online surveys in English and Welsh languages with two survey windows (17 September 2019 to 18 October 2019; and 5 December 2019 to 6 January 2020).
- 590 completed or substantially completed online survey in both languages combined, of whom around 27 per cent work directly in statutory services, around 31 per cent work for housing providers, and around 42 per cent work for charity support providers (both commissioned by public services and voluntary).
- About 64 per cent of respondents directly work with people affected by homelessness, 26 per cent manage a service, and nine per cent in strategy/planning/corporate roles.
- Face to face events included sessions on public health (Cardiff) and mental health (Wrexham), which included a broader group of people who have an interest in housing but come from a health background.

Survey findings

Of the range of solutions offered to help people do their jobs ending homelessness all solutions received a high degree of support and priority. However, almost everyone who responded said “Quicker referral routes into social services and health services, including mental health and substance use” and “Better supply of social housing” were very important/important. Better supply of accommodation generally (affordable, social and move-on/temporary accommodation) featured strongly as very important/important.

Key quotes on solutions included:

“Access to information/guidance and support at times and venues that are available when people are able to access them, not during nine to five hours with appointments people cannot keep.”

“More autonomy for support staff to make decisions”

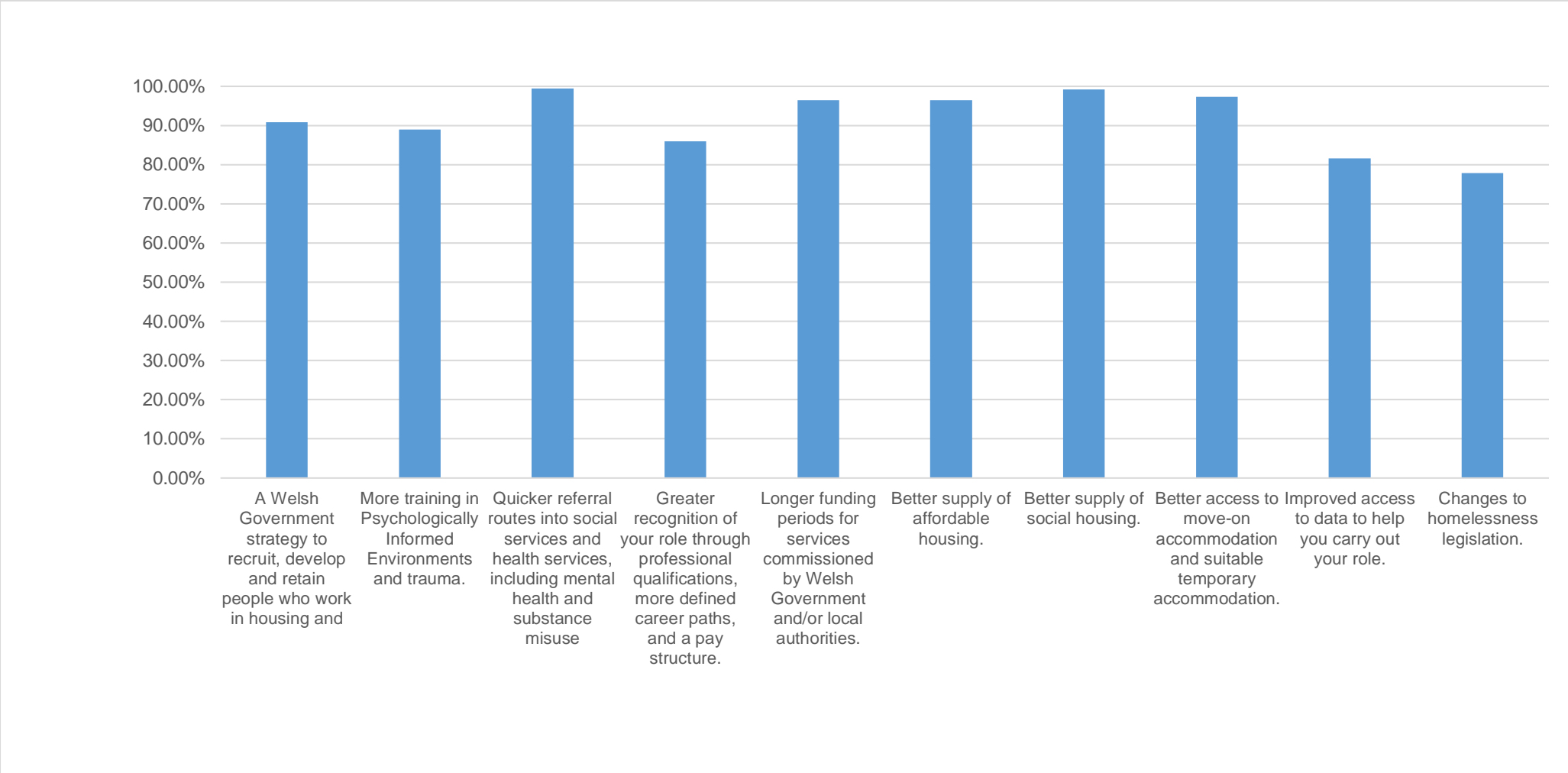
“A much more positive approach to people and their issues in the media”

“All sectors and public bodies taking and sharing responsibility”

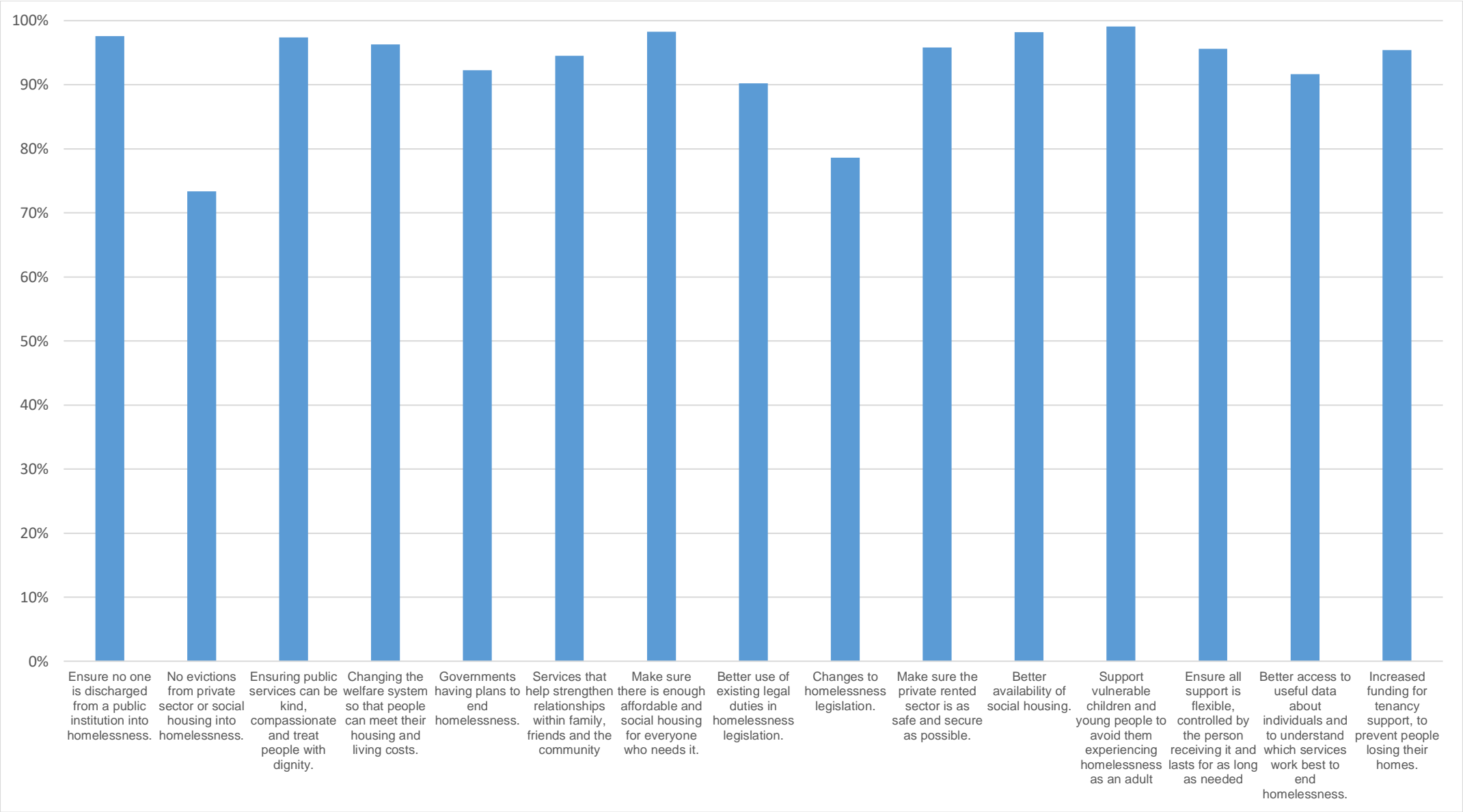
“More affordable housing. More affordable housing. More affordable housing.”

The following graphs also show the proportions of people who rated solutions as ‘very important’ and ‘important’, firstly to help people directly with their work ending homelessness; and then on ending homelessness overall.

Graph: Thinking about your work, how important do you think the following solutions are to helping you to end homelessness more effectively for the people you work with?



Graph: Thinking about your work, how important do you think the following solutions are to help end homelessness in Wales



Key themes from face-to-face meetings/events with people who work in housing/homelessness roles

1. The wider, multi-agency effort needed to end homelessness and not rely on a crisis response.
2. Ensuring a compassionate approach and removing barriers to support so that support is not a matter of 'trying to fit people into a box'.
3. Ending homelessness needs to involve better support for people's mental health with a more flexible approach to meet people's needs.¹¹⁷
4. Short-term funding and/or underfunding are a big challenge that adds to the stress of supporting people experiencing trauma, makes staff retention more difficult, and leads to inconsistency in the support given to people and loss of skills/experience.
5. Need to find ways to better support the workforce and recognise skills/experience.

Events and meetings

November 2019

- WLGA cabinet members for housing meeting (Cardiff, 6th) – presentation and Q&A
- Crisis South Wales members (clients) conference (Swansea, 6th) – presentation and Q&A
- Cymorth homelessness symposium (Cardiff, 12th) – presentation to plenary session and two workshops
- Action Group meeting (Wrexham, 14th)
- Public Health Network Cymru seminar (Cardiff, 20th) – two workshops
- Community Housing Cymru annual conference (Cardiff, 21st) – presentation and Q&A
- 2025 Movement mental health and housing conference (Wrexham, 29th)

December 2019

- Meeting with Future Generations Commissioner (5th)

January 2020

- Action Group meeting (Bangor, 8th)
- WLGA homelessness and housing support network (Llandrindod Wells, 14th) – presentation and Q&A
- Action Group meeting (Newtown, 30th)

¹¹⁷ For more detail on the 2025 Movement conference see the post-conference report: <https://2025movement.files.wordpress.com/2020/01/2025-conference-report-final-1.pdf>

Annex 2 – Full versions of the Action Group’s report 1 recommendations referenced in this report

Recommendation 6: All public bodies must ensure that everybody discharged from a public institution has a sustainable housing solution.

As part of this the Welsh Government should:

- Evaluate and implement any learning from the very short term recommendations in this report.
- Consider publishing periodic data on discharge into homelessness.
- Work with partners to map where expert housing and homelessness resource is in place and working for each pathway. This would be a housing and support expert, located in other services, who takes responsibility and is accountable for ensuring housing needs are assessed and suitable housing is secured through housing partners. Address gaps in expert resource, aim to re-promote the pathways, and report on outcomes.
- Include provision for Critical Time Interventions for people leaving state institutions.¹¹⁸
- Monitor the effect of these measures and consider a duty on wider public bodies to prevent discharge into homelessness, drawing on evaluation of the ‘duty to refer’ for housing support on public bodies in England. Any change in the law in Wales would need to be accompanied with effective resourcing and changes to practice.

All public institutions that have agreed pathways should: cooperate with local authorities to resolve the rough sleeping emergency and, in the longer term, to deliver the pathways.

Local authorities and their partners should:

- Ensure there is a dedicated resource across the pathway in non-housing settings, including staff who have access to housing solutions services that hold the responsibility for preventing/relieving homelessness.
- Place designated homelessness and housing expertise in secure estate and prison settings to work with services to ensure everyone is discharged into safe and stable housing. This includes network coordinator roles that aim to improve relationships between probation and resettlement teams and local authority housing options/solutions.
- Implement the hospital discharge pathway and consider designated homelessness and housing expertise in health settings, drawing from practice such as the Pathway teams¹¹⁹ operating in larger hospitals; and housing advisers in other health settings, such as housing officers in Bodelwyddan

¹¹⁸ Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) *Everybody In: How to end homelessness in Great Britain*. London: Crisis, p.111

¹¹⁹ For more information see <https://www.pathway.org.uk>

Hospital in St Asaph, Caerphilly, St Cadoc's Hospital in Newport, Royal Glamorgan in Rhondda Cynon Taf, and Llandough Hospital in the Vale of Glamorgan.

- Revisit and re-promote the housing pathway for care leavers.¹²⁰

Recommendation 7: Where people are identified as being at risk of homelessness, and ultimately rough sleeping, there needs to be a 'no wrong door' approach to action (and referral to housing support as a minimum).

As part of this Welsh Government should:

- Ensure an 'ask and act' approach for public services in response to homelessness risk but also consider regulation or legislation on public bodies in the longer term. Work with partners on an awareness and action programme tailored to particular professional groups (e.g. GPs, staff in A&E and teaching staff) to help them understand the risks and have clear actions they can take in their role/setting to respond.
- Establish a comprehensive training and wellbeing programme for all professionals who are likely to identify people at risk of homelessness and rough sleeping.
- Use existing structures to involve a wider group of services, such as Public Service Boards, Community Safety Partnerships and Regional Partnership Boards.

Local authorities should:

- Promote a single point of contact in each area for statutory service partners with a referral process that gives local authorities enough information to respond.
- Facilitate an immediate multi-agency conference if someone is at immediate risk of rough sleeping, including local authority housing teams, local homelessness agencies, and all other relevant parties, ensuring that rough sleeping does not happen.

Recommendation 8: Tenancy sustainment and rapid rehousing (including Housing First where appropriate) should be the default approach to support people who are at risk of homelessness or rough sleeping and brought about through a rapid rehousing transition process.

As part of this Welsh Government should:

- Provide transition support to local authorities for effective transition plans. Financial support will be needed to help each local authority area to move from the existing system to a new system and culture that complements

¹²⁰ The care leavers pathway:

<https://www.barnardos.org.uk/sites/default/files/uploads/Care%20leavers%20accommodation%20and%20support%20framework%20for%20Wales%20October%202016%20%28PDF%29.pdf>

existing prevention work. This cost will need to be modelled as part of the process of developing Rapid Rehousing Transition Plans (RRTPs).

- Provide national leadership on the scaling up of Housing First, including ensuring adherence to the well-evidenced fidelity model and that it is available to every individual who needs this particular solution.

Local authorities should:

- Define what an RRTP should include to ensure that rapid rehousing and Housing First do not become optional ‘add-ons’ but are fundamental components of a local housing and homelessness plan, where planning and supply of housing is fully informed by the projected level of need for people at risk of homelessness.
- Use the learning from the development of RRTPs in Scotland, e.g. the Glasgow Homeless Network has written guidance on how to develop a transition plan.¹²¹ RRTPs will necessarily include both commissioning and decommissioning of services from those that maintain people in homelessness to those that move people rapidly into mainstream housing solutions. This should be transparent and strategic, set out in the RRTP and should not include service cuts ahead or instead of new provision. The end result will be a reduction in overall use and lengths of stay in temporary accommodation.

Recommendation 9

A pact should be agreed to ensure no evictions from social housing (or housing supported by the public purse) into homelessness, and increased allocations to homeless households.

As part of this pact:

- Welsh Government should collect and publish data on allocations and evictions, including people at risk of homelessness. This could be based on the CORE dataset in England.¹²²
- As part of the response to the affordable housing supply review, the Welsh Government should take a new approach to allocating the social housing grant, which requires a commitment from social landlords to contribute to ending homelessness. This could include measures to increase allocations to people with experience of homelessness and reduce and end evictions into homelessness; and to provide appropriate training and support to staff to

¹²¹ Glasgow Homeless Network’s guidance and templates for Rapid Rehousing Transition Plans: <https://www.ghn.org.uk/rapid-rehousing-transition-plan/>

¹²² CORE data: <https://core.communities.gov.uk/>

realise this, e.g. to identify people at risk of domestic abuse and link them with appropriate services.¹²³

- Social landlords should ensure a person-centred approach to allocating housing and remove any barriers to homeless households accessing social housing. This aim has cross-party support in the 2018 National Assembly committee report on rough sleeping.¹²⁴ All areas should also look to have a common allocation policy alongside the development of good practice in allocations.
- Social landlords should take a psychologically-informed approach to housing management functions and have access to specialist support from other providers.
- All parties should agree measures for managed move-on (a case conference approach with local authorities) where it is in a person's best interests to move on from housing they were previously allocated, ensuring they are not at risk of homelessness.
- All parties should agree use of Housing Support Grant funds to deliver specific support needs and governments should consider duties or hypothecation of funds to ensure this happens. The Welsh Government should increase the Housing Support Grant budget to ensure that more housing related support services are available to reduce evictions from social housing. This should include the provision of intensive support to people who would otherwise be at most risk of eviction.
- If Registered Social Landlords' measures to strengthen partnerships to reduce and end evictions into homelessness do not deliver a reduction then they should accept a duty to prevent homelessness.

Recommendation 10: Remove the barriers and address misunderstandings that stop people at risk of homelessness or who are rough sleeping from accessing the basic human need for adequate housing and support.

As part of this the Welsh Government should:

- Rapidly review with focus local authorities the learning from any short-term relaxation in regulations and laws referred to in Recommendation 2.
- Abolish the concepts and practice of 'intentionally homeless' and 'no local connection' to ensure prevention or relief of rough sleeping is the foremost consideration. Establish the 'self-presenter principle', where local authorities fund homeless citizens in other local authority areas if they present there, firstly within Wales and then afterwards with the rest of the UK.¹²⁵ There was

¹²³ See example of CIH pledge

<http://www.cih.org/resources/PDF/1Makeastand%20pledge%20FINAL.pdf>

¹²⁴ National Assembly for Wales (2018) Equality, Local Government and Communities Committee report - *Life on the streets: preventing and tackling rough sleeping in Wales*, p.40

¹²⁵ Mackie, P. and Thomas, I. (2016) *Transitory single homelessness in Wales*

cross-party support for this when recommended by a National Assembly committee.¹²⁶

- Abolish the concept and practice of priority need, using the options set out by the forthcoming priority need review. Welsh Government and its partners should phase out priority need progressively and hand-in-hand with both ensuring rapid rehousing becomes the default approach and meeting the need for extra social housing supply. While priority need is being phased out, in the short-term people who are rough sleeping or at risk of rough sleeping should automatically be considered as priority need as well as people leaving prison. This is a change that the cross-party National Assembly committee inquiry into rough sleeping largely supported.¹²⁷
- Work with Substance Misuse Boards, health services and local authorities to explore Heroin Assisted Treatment and further provision of Enhanced Harm Reduction Facilities (also known as ‘supervised drug consumption rooms’).¹²⁸
- Consider the progress against Recommendation 7 (on ‘no wrong door’ to accessing support) and the case for a duty to refer/cooperate on wider public bodies to prevent homelessness and cooperate with prevention/relief work.
- Work with partners to ensure the supply and allocation of suitable and good quality housing to meet needs, including housing provided under the pact referred to in Recommendation 9.

Local authorities should:

- Ensure a ‘No First Night Out’ approach working with all public bodies to ensure no-one at risk of rough sleeping actually sleeps out. Once the risk is identified then the multi-agency response must be to stop rough sleeping happen by providing an adequate alternative and the support to then address housing and other needs.

Recommendation 11: Commissioning of outreach services and other services for people who are rough sleeping or at risk of rough sleeping to promote sustained solutions that support people out of rough sleeping and homelessness for good.

As part of this Welsh Government should:

- Set out an expectation that all public services will become psychologically informed environments and find ways to encourage this through commissioning in social care, mental health and Adverse Childhood

¹²⁶ National Assembly for Wales (2018) Equality, Local Government and Communities Committee report - *Life on the streets: preventing and tackling rough sleeping in Wales*, p.27

¹²⁷ National Assembly for Wales (2018) Equality, Local Government and Communities Committee report - *Life on the streets: preventing and tackling rough sleeping in Wales*, p.27

¹²⁸ See the evidence from the Enhanced Harm Reduction Group for Wales (2018) <https://gov.wales/sites/default/files/publications/2018-08/Submission-enhanced-harm-reduction-group-for-wales.pdf>

Experiences. This should be part of the work of regional and public service boards.

- Consider setting indicative 3- or 5-year budgets for the Housing Support Grant to enable local authorities and their partners to plan strategically to reduce and end rough sleeping in line with these recommendations.

Local authorities should:

- Work with existing multi-agency models (such as the Multi-Agency Safeguarding Hubs) to link with other services.
- As part of the Housing Support Grant arrangements consider a commissioners' network for peer support and advice and the sharing of good practice.
- Phase out time limits on services for people who are rough sleeping or at risk of it. More generally ensure that their commissioning processes and practices allow organisations the resources and flexibility to deliver psychologically informed services, including the time to build trusting relationships with people experiencing homelessness and the funds to invest in support for staff delivering services.

Recommendation 12: National and local metrics and data collection need to be put in place to support the ambition to reduce rough sleeping to zero and to prevent homelessness in the short, medium and long term.

This should support needs for real-time measurement of the number of people sleeping rough, by equipping outreach teams and others with the means to effectively record instances of rough sleeping and case-management details. The recent work on the Street Homeless Information Network across Wales could form the basis for this. Progress so far needs to be evaluated.

As well as implementing SHIN with partners, Welsh Government should also look at the feasibility of individual data collection and linking it with SHIN data to provide information on how people experience different forms of homelessness and to improve prevention work.

Annex 3 – Core homelessness

These tables show the most up to date ‘core homelessness’ data for Britain and Wales. They should be read alongside the research, which defines ‘core homelessness’ and the methodology for the numbers (i.e. they show households that are homeless at any one point in time in the year).¹²⁹

Core homelessness across Great Britain on any given night (households), 2012 to 2017

<i>Core homelessness - GB (totalled)</i>	<i>2012</i>	<i>2013</i>	<i>2014</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>	<i>% change: 2012 to 2017</i>	<i>% change: 2016 to 2017</i>
Rough Sleepers	6,200	7,250	7,250	9,150	10,250	12,300	98%	20%
Car, tent, public transport	5,900	6,900	6,950	8,850	9,950	11,950	103%	20%
Squat, non-res building	11,350	12,200	12,150	13,150	13,150	14,150	25%	8%
In Hostels, refuges, night/winter shelters	47,100	44,900	44,300	42,150	41,150	40,150	-15%	-2%
Unsuitable temp accom	10,700	13,350	15,350	17,500	19,500	20,850	95%	7%
Sofa-Surfers	70,450	70,300	72,800	70,350	71,350	71,400	1%	0%

¹²⁹ Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis.

Total Stock (snapshot)	151,600	153,850	158,700	161,150	167,350	170,800	13%	2%
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Core homelessness across Wales on any given night (households), 2012 to 2017

<i>Core homelessness - Wales (rounded)</i>	<i>2012</i>	<i>2013</i>	<i>2014</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>	<i>% change: 2012 to 2017</i>	<i>% change: 2016 to 2017</i>
Rough Sleepers	200	250	250	300	300	350	75%	17%
Car, tent, public transport	200	200	250	250	300	300	50%	0%
Squat, non-res building	300	250	250	250	250	250	-17%	0%
In Hostels etc.	850	850	850	850	850	850	0%	0%
Unsuitable temp accomm	400	250	300	250	200	200	-50%	0%
Sofa-Surfers	4,200	3,800	3,750	3,200	3,250	3,250	-23%	0%
Total Stock (snapshot)	6,100	5,600	5,600	5,100	5,150	5,200	-15%	1%

Annex 4a – Blank template for at-risk groups and targeted interventions

	Accessible info & advice	Advocacy & peer support	Appropriate housing solutions	Rapid access to mental health support	Co- location	Critical Time Interventions	Info & data sharing	Policy & legal frameworks	Pathways & protocols	Staff training & skills	Systems for early ID	Technology & predictive analytics
People leaving prison, the secure estate, or in contact with a youth offending team												
Young people experiencing homelessness												
Care experienced young people												
People with physical or mental health problems or learning disabilities												
Children and young people in schools and education settings												
People with drug and/or alcohol problems												
People experiencing violence (against												

women and other people), domestic abuse, and sexual violence and survivors												
LGBTQ+ people												
Refugees, asylum seekers and people with no recourse to public funds												
People presenting to a Jobcentre Plus for advice and support												
People experiencing rent/tenancy difficulties												
People experiencing relationship breakdown or difficulties, or bereavement												
People leaving armed forces												

Annex 4b: Examples of targeted support

The following examples illustrate how the types of interventions listed in Annex 4a could be implemented locally, regionally or nationally for groups at particular risk of homelessness.

Co-location – People with mental health problems

Housing professionals based on mental health wards across Wales are able to identify housing issues on admission and either retain a patient's home or arrange new accommodation for them before discharge. Mental health professionals in housing options departments increase housing professionals' understanding of mental health, inform judgements on priority need and advise people on how to access mental health support.

Systems for early identification – Children and young people in schools and education settings

The Geelong Project is an early intervention program in Australia, which works to identify individuals at risk of homelessness and provide a range of early intervention services to prevent young people becoming homeless. A component of this project is a survey which screens for young people at risk of homelessness, and enables support to be offered much earlier in order to prevent this from happening.

Accessible information and advice – People experiencing VAWDASV

Situated in the city centre, Swansea Domestic Abuse One Stop Shop hosts a number of organisations and services which provide information, advice and support to people who have experienced violence against women, domestic abuse and sexual violence. This drop-in service provides information, advice and support for housing, sexual health, mental health, drug and alcohol issues.

Pathways and protocols – People leaving prison / the secure estate

Local authorities in North Wales have created dedicated homelessness caseworkers for prisoners to support the effective delivery of the pathway for prison leavers. They work in partnership with prison and probation staff to engage with prisoners before release, use their knowledge of local services to plan accommodation and provide a tailored wrap-around service. They provide a single point of contact and ensure all partners are aware of the shared pathway, processes and timescales, ensuring critical information and documents are received in a timely manner and housing needs are addressed at the earliest opportunity.

Appropriate housing solutions – LGBTQ+ young people

In Denbighshire a supported accommodation project has been established for young people who identify as LGBTQ+. Led by a third sector organisation, this project provides specialist housing related support within a therapeutic environment, working alongside other agencies supporting the young person, including Youth Services, a local LGBT+ group, CAMHS and a psychotherapist.

Staff training and skills – People with drug and/or alcohol problems

Cardiff and Vale Area Planning Board provided training on trauma and psychologically informed environments to health, housing and criminal justice staff working in statutory and third sector services within the region. This aimed to help them to provide trauma informed support to people with substance use and housing issues.

Annex 5: Experts by Experience: how we can end homelessness in Wales – a consultation report

Attached to this report