Preventing rough sleeping in Wales and reducing it in the short-term

Report to Welsh Ministers from the Homelessness Action Group

October 2019

Preventing rough sleeping in Wales and reducing it in the short-term
First report by the Homelessness Action Group for the Welsh Government, October 2019

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?

This report is the first of the Homelessness Action Group and addresses question 2. We have separated our recommendations into very short term actions between now and winter 2019/20; and actions to prevent rough sleeping altogether.

The recommendations focus particularly on areas of devolved responsibility but inevitably there are some recommendations that need action from non-devolved services, such as police, criminal justice or welfare, and the recommendations identify how this could be done.

Group members

- Jon Sparkes (chair) – Chief Executive, Crisis
- Bonnie Navarra – Assistant Police and Crime Commissioner for South Wales, seconded to the Office of the Future Generations Commissioner
- Clare Budden – CEO, Clwyd Alyn Housing Association
- Clarissa Corbisiero – Director of Policy and External Affairs, Community Housing Cymru
- Frances Beecher – Chief Executive, Llamau, and chair of End Youth Homelessness Cymru
- Gaynor Toft, Corporate Manager (Housing), Ceredigion County Council
- Glynne Roberts – Programme Manager, Well North Wales, Betsi Cadwaladr University Health Board
- John Puzey – Chief Executive, Shelter Cymru
- Katie Dalton – Director, Cymorth Cymru
- Lindsay Cordery-Bruce – Chief Executive, The Wallich
- Naomi Alleyne – Director of Social services and Housing, Welsh Local Government Association
- Dr Peter Mackie – Reader, Cardiff University
- Tamsin Stirling – Freelance homelessness and housing expert

Summary of our recommendations
This section provides the topline recommendations that focus on the outcomes needed. Please note that the report provides detail on *how* these outcomes can be delivered and which individuals or organisations should lead in delivering them.

Reducing rough sleeping in the very short term (recommendations 1-4 are primarily for the four 'focus' areas)

Recommendation 1: Ensure there are sufficient well-trained assertive outreach workers deployed, and empower outreach workers to be able to support people to move away from rough sleeping and into good quality and appropriate emergency, temporary or permanent accommodation and housing at the earliest opportunity.

Recommendation 2: Ensure that people sleeping rough can access the support they need by addressing barriers and misunderstandings that currently prevent this happening. This includes immediate voluntary short-term or permanent suspension of some laws or regulations, pending full consideration of the regulatory and legislative position. This also includes ensuring other public services deliver their commitments to support people who are sleeping rough.

Recommendation 3: Ensure that emergency and temporary alternatives to rough sleeping are available with the capacity needed, and the diversity of provision, to maximise impact and dignity.

Recommendation 4: Housing associations, local authorities and Welsh Government should use collective resources to maximise the number of social homes let to homeless households, particularly individuals who would otherwise sleep rough.

Recommendation 5: People and organisations that communicate about homelessness in public should agree a common approach to framing, messages and calls to action about homelessness. This will help members of the public and volunteers have a clearer idea about what they can do in the short term to help people who are rough sleeping or homeless, and in the longer term what they can do to help end homelessness.

Preventing rough sleeping

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

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).

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.

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.

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.

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.

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.

The Action Group's approach

This section describes the Action Group's general approach to its work and how it set about answering the rough sleeping questions the Minister asked.

Group members

The group's chair and the Minister worked together to invite members to join the group. The chair has previous experience of chairing a similar group for the Scottish Government and leads an organisation that works across all three nations of Britain.

The Action Group membership represents a broad range of organisational and professional backgrounds. Each member individually brings a mix of knowledge, expertise from Wales and beyond, strong links with services that work directly with people affected by homelessness, and networks that include people whose input the Action Group needed.

The Action Group's steps to develop the recommendations

1. At the outset the Action Group agreed that a range of evidence would form the basis of all recommendations. We have also grounded our recommendations in the belief that no person in Wales wants to live in a society where a small but growing number of our most vulnerable citizens are stuck on the street sleeping rough. We all would like our society to ensure every person has their basic need for a home and support met. In recent years the rise in people sleeping rough and the damage this causes has become a humanitarian crisis that services and individuals – including the organisations that Action Group members work for – must tackle and end together.

2. The Action Group started by reviewing existing evidence on ending homelessness, including the work of the Scottish group[1]; the review by Mackie et al on what works to end rough sleeping;[2] and Crisis' report on how to end all forms of homelessness across the three nations of Britain.[3]

3. We noted the experiences both in and beyond the Action Group in implementing the Housing (Wales) Act 2014 and the importance of culture change in achieving a steady prevention rate in housing options/solutions services across Wales.[4] A similarly "inclusive and co-productive approach to homelessness policymaking" is needed for the changes this report recommends, building on what worked in implementing the Act but also taking the next step in homelessness prevention, which is to make it a public service issue.[5]

4. The group was particularly keen to hear from people with experience of homelessness. Tamsin Stirling gave her time to the Action Group to review relevant

---

[1] Scottish Government, Homelessness and Rough Sleeping Action Group webpage: https://www.gov.scot/groups/homelessness-and-rough-sleeping-action-group/
[2] Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London
[3] 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.
[4] Stirling, T. (2017) Homelessness: changing the law, changing the culture. Welsh Housing Quarterly blog, 8 August 2017 https://www.whq.org.uk/2017/08/08/homelessness-law-culture/
[5] Connell, A. (2017) *The development and implementation of Part 2 of the Housing (Wales) Act 2014: Lessons for Policy and Practice in Wales.* Public Policy Institute for Wales http://ppiw.org.uk/files/2017/07/PPIW-Homelessness-Policy-Reunion-Report-July-2017-final.pdf

research reports from the past two years to draw out the conclusions, particularly the experiences of people affected directly by homelessness. The group added to these with an ongoing peer research consultation, led by Shelter Cymru and working closely with group members. Initial findings are presented below and feature throughout this report.

5. The group is also carrying out ongoing consultation with people who work in housing and homelessness roles across Wales in a variety of backgrounds, including statutory services, housing, and support. Initial findings are presented below and feature throughout this report.

6. Meeting every three weeks across various locations in Wales, hosted by Action Group members, to reflect on the emerging findings of our work, develop by iteration the recommendations, and refine them.

7. Working in a transparent way, including through the consultations and separate meetings with stakeholders. The chair also posted a blog update, posted on the Crisis website within 24 hours of each meeting. We shared the blogs on social media and Action Group members sent the update to their networks.

8. This report focuses on helping people already rough sleeping and then looks at how to prevent rough sleeping. The future work will go further 'upstream' into earlier, preventable stages, where people experiencing risk of homelessness and other forms of unstable or unsafe housing. For all our work we will use the five-category typology of prevention that includes universal (working with the population at large to prevent homelessness); targeted (focusing on groups at risk or at key transition points in their lives), crisis (preventing homelessness around the 56-day risk point, which is the statutory duty for local authorities in Wales), emergency (those at immediate risk especially of rough sleeping) and recovery (prevention of rough sleeping and repeated homelessness).[6]

9. The Action Group strongly advocates monitoring and evaluating all these recommendations against outcomes to inform good practice across Wales.

Evidence from people with experience of homelessness or working in support roles

The group is running parallel consultations with people with lived experience of all forms of homelessness and with people who work in statutory and voluntary settings in housing and homelessness roles.

These consultation processes will continue into the winter 2019/20 along with the Action Group's work, addressing rough sleeping and then homelessness more broadly. We are very grateful to people with experience of homelessness and people working in housing and support roles who responded to the surveys so far.

Our approach to the consultations so far has been:

- To start broadly, using surveys to ask people with experience of homelessness and people who work in housing and homelessness support about their experiences and most favoured solutions to homelessness.
- For each survey we listed the solutions based on evidence of what works and mapped them against the Action Group's four questions and, wherever possible, mirrored the questions in both sets of surveys.

---

[6] Fitzpatrick, S., Mackie, P., and Wood, J. (2019) *Homelessness Prevention in the UK – Policy Briefing*, p.3 http://thinkhouse.org.uk/2019/cache0719a.pdf

- For the consultation with people with lived experience, the fieldwork involved a two surveys on the Survey Monkey platform (in English and in Welsh), launched during the week commencing 16 September 2019. Action Group members and their contacts sent the links to the surveys, and facilitated responses from people with experience of homelessness. A small group of peer researchers organised by Shelter Cymru took the survey to housing options/solutions services across a range of locations in Wales.
- The approach for people who work in housing and homelessness was similar but involved online-only consultation in the first stage. Most Action Group members had colleagues working in client-facing services and some members took a particular lead in making sure their members/colleagues took part, particularly Welsh Local Government Association, Community Housing Cymru, Cymorth and Llamau.

For both consultations, the next steps will be to take the common themes that emerged from the surveys and report back to groups of people either who responded directly or have relevant experience and knowledge. We will discuss the themes in more detail and publish findings in forthcoming Action Group reports but the evidence presented here was gathered between 16 September and 30 September 2019.

Both consultations showed that the solutions people prioritised most highly related 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.

Key themes from people with lived experience:

- We had 149 responses, of whom more than half (54%) have experienced homelessness within the last 5 years. Over 50 per cent of respondents are in 'less stable/secure types of accommodation' (hostel, rehab, temporary accommodation etc) and 45 per cent have their 'own home' (owned, private rented sector, social etc). Only 10 per cent of respondents said they never worry about their housing situation.
- The survey offered a list of policy solutions relating to each of the relevant questions the Action Group is answering. For rough sleeping the first two solutions prioritised were to provide emergency accommodation accessed without barriers (57% of people chose this as their top priority); and changing local connection rules to ensure people can access support wherever they need it. In open comment responses there was consensus that the solutions should be: to increase the amount of affordable, secure housing; to improve emergency accommodation; and to improve the treatment people experience when accessing services.

Key themes from people who work in housing and homelessness:

- Of 177 responses to the survey so far, more than half were from people who work directly with people experiencing homelessness (53%) while others manage a service (33%), and the remaining responses were from people in strategy/planning roles or 'other' roles. There is to date a roughly even split in respondents from statutory services, housing organisations, and third sector services (both commissioned and voluntary).
- Respondents were asked in which parts of Wales they work. 3 per cent of respondents work nationally. The most common local authority areas respondents work in are Swansea, Neath Port Talbot, Cardiff, Carmarthenshire and Merthyr Tydfil.

- We asked respondents to prioritise and comment on 10 policy solutions that could help them specifically in their work to end all forms of homelessness. Access to accommodation was a key theme and three of the top five solutions prioritised related to it.[7] Other solutions in the top five included better referral routes in place with social services and health (including mental health and substance use) and longer funding periods for commissioned services. None of the 10 solutions scored less than 70 per cent priority in total for being 'very important'/'important' although the top five were clearly prioritised more highly.
- Respondents prioritised two solutions to rough sleeping specifically from the list of possible solutions more highly than others. These related to joint working between agencies and timely access to emergency accommodation.[8] Other solutions that were prioritised strongly included more access to persistent outreach services and new approaches to reducing the harm of drugs and alcohol.

---

[7] Question: '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?' with a list of solutions to prioritise on a five-point scale from 'very important' to 'not important'. The three referred to were better supply of affordable housing; better supply of social housing; and access to suitable temporary accommodation.

[8] These solutions were: 'Different services/agencies working better together (e.g. health, care and police) and sharing information to understand what does and doesn't work for individual people' and 'Make sure there is enough emergency accommodation available that can be accessed immediately without barriers'. Around 97 per cent of respondents said these were 'very important'/'important' for each solution.

Reducing rough sleeping in the very short term

These recommendations aim to tackle rough sleeping in the very short term, leading up to the winter of 2019/20, and focus on helping people already at the crisis point of sleeping rough. However, the only sure way to end rough sleeping overall is to prevent homelessness from happening in the first place, so these recommendations need to be considered in the light of the Action Group's wider work in the coming months.

It is no exaggeration to say that Wales faces a rough sleeping emergency, given recorded rough sleeping across Wales increased by 45 per cent between 2015 and 2018.[9] Despite the examples of good practice in ending rough sleeping across Wales, the current approach is clearly not working to relieve the pressures on people sleeping rough and help them away from the street. Last year's evaluation of the Housing Act 2014 found local authorities across Wales generally thought people rough sleeping had benefited least from the changes in the law and the culture change to a more preventative system.[10]

As short-term proposals, these recommendations will not necessarily be a key part of the later work to take a more strategic approach to homelessness. However, where possible we recommend approaches that will form a part of the very short term response to rough sleeping where it occurs in the future. The short-term recommendations are not backed by legislation or regulation due to the short timescales available, but should be backed by agreement on resources and a commitment across national and local government and other agencies to act quickly and voluntarily in response to the emergency.

'Focus areas' during the winter

For these very short term recommendations, the Action Group discussed whether the Welsh Government and partners should focus on areas with the greatest prevalence of rough sleeping only (e.g. Cardiff, Swansea, Wrexham and Newport) or apply recommendations across all area of Wales. The Action Group agreed the principle of 'proportionate universalism' should apply, and the recommendations should be applied across the country. However, any additional resources must be focused initially on areas where there is greatest need, where the resources can achieve greatest impact, and where there is commitment to reform current approaches.

In many cases, this report looks at known and proven approaches and the recommendation focuses on how to implement them in full. For example, ensuring outreach meets the 'assertive outreach' definition from the evidence; that multi-agency work happens in real-time, supported by case conferences and by-name lists of people supported; and agreed pathways are delivered. These recommendations are also an opportunity to try new ways of working, ideally across partnerships of statutory and non-statutory organisations, devolved

---

[9] 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.
[10] A. Ahmed, M. Wilding, A. Gibbons, K. Jones, M. Rogers, I. Madoc-Jones (2018) *Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014*: Final Report. Cardiff: Welsh Government, GSR report number 46/2018, para. 8.54

and non-devolved services, bringing together expertise to make a real difference in a particular area.

These short-term actions must be evaluated for evidence and learning about what works in the longer term. This is a real opportunity to show what works, and for Wales to make a rapid difference to the lives of people forced to sleep rough right now.

In each of the four focus areas the approach should be:

1. Achieving agreement on a voluntary basis to bring about these recommendations and co-producing the approach between Welsh Government, local authorities and their partners. This should be backed by additional resources from the Welsh Government in the first instance but there could be potential for other services or organisations to contribute.
2. Urgent focus with a lead project manager in each area in place by mid-October 2019, preferably an existing member of staff seconded into this role or a fixed-term appointment for six months. The focus of this role will be to coordinate the daily case conferences, manage personal budgets, and evaluate the outcomes at the conclusion of the work.
3. Measures to ensure assertive outreach and a multi-agency approach. The following recommendations detail how this can be done but each area needs to have assertive outreach services that can be mobile and also based in existing multi-agency settings where these exist. It must be available in real-time, including overnight and at weekends, with daily case conferences.
4. Agreeing outcomes at the outset of the work is critical and needs to measure the number of people successfully housed in safe, secure and dignified accommodation for the winter. The focus at this stage is harm reduction and establishing relationships to help end people's homelessness in the near future. In Spring 2020 the project manager should ensure the implementation is evaluated and published, including any lessons learned and reports on return-on-investment.

While we recommend focusing on the areas where recorded rough sleeping is the highest, all other local authorities should use these recommendations to self-assess their own provision for this winter; co-operate if necessary with neighbouring local authorities that have high rates of rough sleeping; and look to learn from the evaluation of the measures taken this winter on the basis that successfully evaluated measures will need to be translated to all areas in due course.

Outreach with people sleeping rough

Analysis of each annual national rough sleeper count to date has found the vast majority of people across Wales who were recorded sleeping rough would like help (86% of respondents in the 2018 count). Yet, the most recent analysis by the Welsh Local Government Association still recommends that more needs to be done to put in place services that respond to support people where and when they are needed.[11] Our consultation with people working in homelessness and housing roles showed 91 per cent of respondents thought this was an important (or very important) part of the solution.[12]

The Action Group firmly recommends an 'assertive outreach' approach, which is a form of street-based outreach, where services are delivered on the street to people rough sleeping. According to evidence, and experience of Action Group members, it works when:[13]

- The primary aim is ending homelessness and therefore real and dignified accommodation options are available to people who would otherwise sleep rough;
- There is multi-disciplinary support available from a range of services;
- The outreach approach is persistent, purposeful and assertive.

Establishing a new assertive outreach team need not take a long time, provided there is willingness on all sides to work in partnership. Under the Scottish Government's Winter Initiative 2017/18, for example, Aberdeen Cyrenians, Aberdeen City Council and partners (such as police, street pastors and A&E) setup the city's first assertive outreach team during a fortnight and with £80,000 additional funding.[14]

Outreach workers need to be able to help people on the street swiftly. By accessing a small budget for individuals, outreach workers can use their full professional discretion for the purposes of building trust with people who are rough sleeping and for helping them to access safe and appropriate emergency accommodation. This must be on a 'do no harm' basis and appropriate to the individual, e.g. outreach workers should make a decision about whether short term bed and breakfast provision would be appropriate for an individual.

Parts of Wales previously piloted this approach (known as 'personal budgets') during 2011-2013 and it was fully evaluated by the University of Salford. The evaluation found many successes in housing and wider outcomes. Average expenditure per recipient across pilot

---

[11] Rowlands, B. and Williams, J. (2019), *Analysis of 2 week National Rough Sleeper Count Questionnaires November 2018*. WLGA, Local Authorities Housing Networks. February 2019. https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=2182

[12] Respondents were asked to rank the relative importance of policy solutions in response to 'Thinking about your work, how important do you think the following solutions are to helping people who are already rough sleeping?' The proposed solution was 'More access to persistent outreach services to build trust and relationships with the goal of helping people into suitable housing'

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

[14] Simon Community, Aberdeen Cyrenians and Streetwork (2018), *Views from the frontline – the 2017/18 winter initiative*, pp.20-1

areas was just under £435.[15] It was also successfully introduced as part of the Scottish Government's Winter Initiative in 2017-18, for which it was allocated up to £50,000.[16]

To ensure a multi-disciplinary approach, services in each place should hold daily 'case conferences' to consider by-name lists of those people rough sleeping in that city or local authority area currently, and agree on a multi-agency basis the actions to address the needs of each person rough sleeping that day. The project manager role will need to be available to convene and co-ordinate this activity and there is potential for short and longer term co-location of teams to support this way of working.

Outreach also needs to use Cymorth's work in progress with the Welsh Government to define 'assertive outreach' in the Welsh context, which is based on the evidence of what works and on bringing a psychologically-informed approach to actively help people away from the street as soon as possible.

Recommendation 1
Ensure there are sufficient well-trained assertive outreach workers deployed, and empower outreach workers to be able to support people to move away from rough sleeping and into good quality and appropriate emergency, temporary or permanent accommodation and housing at the earliest opportunity.

As part of this Welsh Government should:
- Ensure the Minister meets political leaders and relevant chief officers of each local authority where rough sleeping rates are highest to agree a different approach this winter. The meeting should agree expectations and negotiate the approach (including any extra resources) for the coming winter based on these recommendations. There should be a plan to work in these focus areas to address any variation in practice and capacity, and to scale-up good practice across all focus areas.
- Provide to all local authorities and their partners the definitions of outreach that is 'assertive', 'well-trained' and 'sufficient' based on the work led by Cymorth and address any national training and development needed to adopt this recommendation. This is similar to the National Assembly's committee recommendation last year on assertive outreach.[17]
- Ensure all local authorities undertake an urgent mapping exercise to self-assess access to outreach that meets the above definitions; and to assess and address the numbers of outreach workers deployed compared to numbers of people sleeping rough in each area, with some consideration given to the impact of rural/urban environments and levels of complexity and need of people rough sleeping in different places.

Local authorities in the focus areas should:
- Work with the Welsh Government to ensure the four elements mentioned earlier in this report are in place: voluntary local agreement with partners; a project manager; a multi-agency assertive outreach response to link people to safe, dignified and secure accommodation; and monitoring/evaluation of outcomes).
- Use the definitions and mapping exercise to identify quickly whether there are gaps in provision and to ensure these are addressed urgently. This should build on

---

[15] Brown, P. (2013) *Right time, right place? An evaluation of the Individual Budget approach to tackling rough sleeping in Wales*. University of Salford.
[16] Scottish Government (2018), *HARSAG Winter Initiative – Executive Summary*, para. 18
[17] National Assembly for Wales (2018) Equality, Local Government and Communities Committee report - *Life on the streets: preventing and tackling rough sleeping in Wales,* p.65

- the recent mapping done by The Wallich as part of the Street Homeless Information Network development.
- Empower outreach workers with personalised budgets, noting the learning from the evaluation of the Welsh pilots and the Scottish winter initiative 2017/18.
- Put in place daily multi-agency case conferences throughout the winter, including the by-name discussion about people each service is working to support, discussion of accommodation vacancies, and people who are able to move on from emergency provision.
- As part of this, outreach services should visit faith-based night shelters to arrange support, plan for the post-winter period, and help people move to more permanent accommodation if possible. This is in line with the cross-party recommendation in the 2018 National Assembly committee report on rough sleeping.[18]
- Based on funding and accommodation stock made available, start to develop 'whatever it takes' pathways to help people away from the streets, making use of assertive outreach, personal budgets etc. While the support will be specific to each person there are broad common circumstances that services can use to guide these pathways, e.g. for people who have been rough sleeping for an extended period of time; for people leaving institutions such as prisons and hospitals; and for people who are under imminent threat of rough sleeping or have only recently slept rough. These can form the basis of future multi-agency work.

Removing barriers to support

Existing laws, regulations and protocols such as local connection, intentionality and priority need can be a barrier to effective support, even if this was not intended. This can happen both in the ways that policies and laws were written but also how well they are implemented.

In our survey with people who have experience of homelessness, reforming local connection rules so that people can access support where they need it was the second most highly prioritised solution to rough sleeping.[19] Our survey with people working in homelessness and housing found that people in these roles did not prioritise this change as highly as other solutions (although almost 65% of respondents still said it would be 'very important'/'important' to make this change). However, open comment responses by people working in these roles suggested they did agree that the application of local connection was an issue. One comment said: "Local connection is not a factor to receive help under the Act, the issue is local connection being a condition of locally commissioned services."

The evaluation of the Housing (Wales) Act 2014 found different local authorities applied rules, such as 'local connection', in different ways and that there was a need for a more flexible approach to providing support that took into account the complex needs that people rough sleeping often had.[20] In a study of areas with higher rates of rough sleeping, Shelter

[18] National Assembly for Wales (2018) Equality, Local Government and Communities Committee report - *Life on the streets: preventing and tackling rough sleeping in Wales,* p.49

[19] The solution was 'Only people who have a connection with the area that they are presenting to can get certain help. We could change these rules so people can access support where they need it rather than their 'home' local authority.' The first placed solution related to better access to emergency accommodation.

[20] A. Ahmed, M. Wilding, A. Gibbons, K. Jones, M. Rogers, I. Madoc-Jones (2018) *Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014*: Final Report. Cardiff: Welsh Government, GSR report number 46/2018, para. 8.54

Cymru found decisions on priority need, local connection and intentionality were "frequently cited" as barriers to ending homelessness. However, the study also found that understanding of the legal concepts could be "incomplete" both among people rough sleeping and support workers.[21]

International evidence also suggests that locally funded service models, such as those in Wales, are "likely to lead to restrictions being placed on those without a local connection" and a report by Cardiff University recommended alternative approaches.[22] There was broad support across parties in the 2018 National Assembly committee report on rough sleeping for measures to address legal barriers, strengthen guidance, and phase out the priority need test.[23]

More widely, there is potential to deal with wider laws and attitudes that prevent a cross-public service approach to preventing homelessness and rough sleeping. The Vagrancy Act 1824, and anti-social behaviour measures like Public Space Protection Orders (PSPOs), are still used across England and Wales to 'move people on', away from sources of support and sometimes into more dangerous or criminal activities to survive. While use of the Vagrancy Act varies across England and Wales, South Wales police area was in the top five areas for convictions under the Vagrancy Act in 2018.[24]

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.[25] In our consultation with people working in housing and homelessness roles, 86 per cent of respondents said it was 'very important' or 'important' to have "A new approach to drug and alcohol consumption to reduce harm (e.g. increasing use of safe rooms to use drugs/needle exchanges, wet houses that allow alcohol consumption etc.)." Respondents also commented on the importance of this provision being linked to support services and that it should only be used where it is appropriate for the individual (i.e. not housing people in this provision if they did not want to be there). The Advisory Council for the Misuse of Drugs also recently recommended new approaches for multi-agency services based on evidence, including peer mentoring and outreach, opiate substitution treatments, and tailoring of services specifically targeted to help people with experience of homelessness.[26]

Recommendation 2
Ensuring that people sleeping rough can access the support they need by addressing barriers and misunderstandings that currently prevent this happening. This includes immediate voluntary short-term or permanent suspension of some

---

[21] Shelter Cymru (2018), *Trapped on the Streets*, p.12

[22] Mackie, P. and Thomas, I. (2016) *Transitory single homelessness in Wales*, p. 7

[23] National Assembly for Wales (2018) Equality, Local Government and Communities Committee report - *Life on the streets: preventing and tackling rough sleeping in Wales,* p.25-6

[24] Morris, N. (2019), *Scrap the Act: the case for repealing the Vagrancy Act (1824).* Crisis: London.

[25] Office for National Statistics (2019), *Deaths of homeless people in England and Wales: 2018.* Published 1 October 2019.

[26] Letter from the ACMD to the UK Home Secretary, Re: ACMD Report - Drug-related harms in homeless populations and how they can be reduced. Dated 19 June 2019; https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810284/Drug-related_harms_in_homeless_populations.pdf

laws or regulations, pending full consideration of the regulatory and legislative position. This also includes ensuring other public services deliver their commitments to support people who are sleeping rough.

As part of this Welsh Government should:
- Write to relevant local authority leaders and chief officers in focus areas to clarify the current legal position and policy direction; and meet leaders and senior officers in each focus local authority to agree the approach for this winter. This should include an offer of extra funding for local authorities that are willing to trial the suspension of intentionality and local connection provisions for people sleeping rough.
- Work with police forces and other partners in the Policy Liaison Unit to secure full involvement in the multi-agency case conference approach in Recommendation 1 and the rationale for taking part. In each area, local agencies should work together to support people rather than 'moving people on' without any support. This includes agreement to voluntarily suspend use of the Vagrancy Act this winter and review any current or planned Public Space Protection Orders that will affect people sleeping rough.
- Work with Substance Misuse Area Planning Boards and a police force area and its Police & Crime Commissioner to trial an enhanced harm reduction approach to supporting people sleeping rough who also use drugs.
- Ensure the Minister and the Health and Social Services Minister agree with Local Health Board leads that health staff will be involved in multi-agency working this winter and the health and wellbeing rationale for taking part. Use this early work as a base to re-promote the future delivery of hospital discharge protocols.[27]
- Independently evaluate the impact of these recommendations, when delivered, to inform more permanent policy decisions at local authority or national level in Wales.

Local authorities in focus areas should:
- Agree to suspend approaches such as 'intentionality' and 'local connection' for people sleeping rough.
- Treat people rough sleeping, or at immediate risk of rough sleeping, as automatically in Priority Need.
- Seek agreement from police services that where people are sleeping rough, the response will be to work with local agencies to obtain the support needed, rather than moving people on. This will include taking part in multi-agency case conferences and, if they encounter someone rough sleeping, immediately contact the local outreach team and wait with the person who is rough sleeping to ensure they are safe until the outreach team arrives.

Police forces should:
- Voluntary suspend use of the Vagrancy Act and use of enforcement powers without any form of support and instead take part in multi-agency arrangements with local authorities and other partners to support people away from rough sleeping.

Emergency accommodation during the winter

---

[27] Bradley, J and Hobbs, R (2014) *Hospital Discharge Protocol for Homeless People in Wales*. Health of Homeless People Advisory Group
http://www.publichealthnetwork.cymru/files/5214/4613/4011/Hospital_Discharge_Protocol_for_Homeless_People_in_Wales_John_Bradley__Rhiannon_Hobbs_2014.pdf

There are many examples of people being forced to choose to sleep rough because emergency provision is understandably considered dangerous or below standards of human dignity. We heard strongly in our consultations with people who have lived experience of homelessness and from professionals that access to suitable emergency accommodation (and housing) should be a top priority.

In winter 2017-18 a shortage of emergency accommodation and safe accommodation were "key drivers" for people sleeping rough. People working in homelessness also recommended that existing accommodation needs to be more strategically managed rather than only used on a 'first come, first served' basis.[28] Prison leaver respondents in an evaluation study made a link between reoffending and their accommodation status, particularly how "poor quality options" increased their risk.[29]

The provision of emergency accommodation during the winter should be a very short term recommendation. However, 'emergency' must not be a byword for poor quality, unsuitable, unsafe or undignified accommodation. It should not include tents, pods or temporary structures, floor space or 'sitting up' facilities. It is also not a substitute for safe and stable housing with support.

The End Rough Sleeping Cymru network is developing emergency accommodation standards that should be the national benchmark for what short term suitable, safe and dignified accommodation should be. In the interim, before the standards are published, providers should assess provision using the principles of good emergency accommodation that the network co-produced with people who have experience of homelessness.

Recommendation 3

Ensure that emergency and temporary alternatives to rough sleeping are available with the capacity needed, and the diversity of provision, to maximise impact and dignity.

Welsh Government should:
- Adopt the standards for emergency accommodation, when they are published, as a national benchmark.
- Contact universities and education institutions in the target local authority areas to seek empty student accommodation as emergency accommodation for people who would otherwise sleep rough and, if necessary, arrange for a contractor to prepare the accommodation to return to its existing use after the winter.
- Work with Registered Social Landlords to access housing on an emergency basis (see Recommendation 4).

Local authorities should:
- Using the emergency accommodation standards as a starting point, ask Heads of Housing Options/Solutions teams to lead in assessing the likely supply and demand for emergency accommodation this winter, and ensure that where necessary capacity is increased or adjusted in the short term. This should also cover diversity (i.e. ensuring provision for male/female, single/couple, dry/wet) and dignity, which will maximise the opportunity for people rough sleeping to move off

---

[28] Shelter Cymru (2018), *Trapped on the Streets*, p.9 https://sheltercymru.org.uk/wp-content/uploads/2018/09/Trapped-on-the-Streets-Full-Report.pdf
[29] A. Ahmed, M. Wilding, A. Gibbons, K. Jones, M. Rogers, I. Madoc-Jones (2018) *Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014*: Final Report. Cardiff: Welsh Government, GSR report number 46/2018, para. 6.1.4

the street quickly. It will include requirements, such as secure storage for people staying in the accommodation.

- Consider the balance of statutory provision and the wider supply of faith-based, community and charity provision, closely liaising with partners such as Housing Justice Cymru. This work should ensure these groups are aware of and involved in setting the overall strategic direction to reduce rough sleeping and deliver housing-led solutions.
- Consider any adjustments to existing emergency accommodation 'stock' that would help the stock meet emergency accommodation standards, e.g. adding extra privacy measures or secure storage.
- Secure voluntary accommodation in the short-term, if needed, from universities and colleges, hotels and holiday accommodation, or other businesses, provided it meets the End Rough Sleeping Cymru standards and is suitable emergency accommodation for the individuals concerned.

Social housing contribution to reducing rough sleeping in the short term

Housing associations and stock-owning local authorities provide the majority of supported housing in Wales, including hostel and Housing First units.[30] A number of new Housing First projects are under development by housing associations, and further allocation of stock is being considered.[31] At this stage in the year, there is potential for the sector to contribute in the short term, not as a systemic intervention but to help tackle the rough sleeping emergency.

This will need to be supported in a more rounded way, not just providing housing but the support to access and sustain someone's accommodation in a community location that is helpful for their move out of homelessness. In the longer term this relates to the size and allocation of the social housing grant and delivery of housing support.

There is potential on an emergency basis to support stock-owning local authorities and housing associations in agreeing a sustainable basis for letting an increased number of properties to homeless households who would otherwise fall within the exclusion policy of their local common housing register. However, allocations processes into social housing should also be reviewed across Wales as part of longer term alleviation and prevention of rough sleeping, as we recommend later in this report.

Recommendation 4

Housing associations, local authorities and Welsh Government should use

---

[30] Ipsos MORI, Imogen Blood & Associates and Housing & Support Partnership (2016), Supported accommodation review
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/572454/rr927-supported-accommodation-review.pdf
[31] See presentation slides references to the Housing First Network's Housing Management Sub-Group:
https://www.cymorthcymru.org.uk/files/1815/6329/4549/The_Role_of_Social_Landlords_Harry_McKeown_Pobl__Julian_Price_United_Welsh_-_Housing_First_Wales_conference_Cymorth_Cymru.pdf

collective resources to maximise the number of social homes let to homeless households, particularly individuals who would otherwise sleep rough.

Welsh Government should:
- Facilitate a discussion with Community Housing Cymru, WLGA, Registered Social Landlords and stock-holding local authorities, to identify target areas and facilitate discussions between housing associations and local authorities to identify additional and targeted support and housing to support emergency need.
- Contact relevant people in the Department of Work and Pensions (and Job Centres Plus) to agree fast-track homelessness prevention/relief measures so that housing benefit can continue if people move to short term housing provision. The Department of Work and Pensions is already undertaking work in England under its 'duty to refer' in the Homelessness Reduction Act 2018 and this could be extended on a voluntary basis to Job Centres Plus in Wales.
- Promote use of Discretionary Housing Payments and the Discretionary Assistance Fund to support this recommendation.

Community Housing Cymru and WLGA should:
- Lead work with housing associations and local authorities to support them to respond quickly to the emergency need for people who are rough sleeping or at immediate risk.

Local authorities and housing and support delivery partners:
- As part of duties set out in the Housing (Wales) Act 2014, local authorities should inform Registered Social Landlords in their areas about the nature of need and level of housing stock required.
- Agree on a case-by-case basis and linked to multi-agency case conferences when rehousing individuals in these properties is the best option.
- Ensure relevant local stakeholders and public understand why particularly vulnerable people are rehoused before other people because of the risks of not taking this action.
- Contribute to the partnership, particularly in the planning and provision of support for the person to access and sustain a tenancy.
- Support people to make applications for discretionary funds to help with rehousing.

Public awareness and action

Polling evidence from winter 2018 for Crisis 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.[32] Only a minority of adults in Wales in recent, separate polling recalled hearing about long-solutions to rough sleeping (18%), despite a much larger proportion of adults saying they had heard about rising levels of homelessness and rough sleeping (67%).[33]

---

[32] 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"

[33] nfpSynergy (2019), *Celtic Charity Awareness Monitor*, June 2019, by nfpSynergy for Crisis. Base: 1,000 adults 16+, Wales

This echoes the findings of research by the FrameWorks Institute into media and public understanding of the causes and solutions to homelessness, which also found public thinking was based on misunderstandings of the causes and solutions to homelessness. These misunderstandings are reinforced by the communication and discussion about homelessness in the public sphere.[34] Based on data from experimental surveys, the FrameWorks Institute recommends changes to current communication to help the public better understand the problems and solutions to homelessness.[35]

This recommendation will help harness the goodwill and efforts of people and organisations who want to help people who are rough sleeping. While it would start as a short-term recommendation it should be continued into the longer-term, particularly to help members of the public contribute to strategic action that will ultimately end homelessness.

Based on the fact that many of these very short-term recommendations will be delivered on a 'voluntary' basis by services there is a need to involve all government departments, public services, local authorities, housing providers, and community and faith groups as participants in this campaign, both to take the actions set out in this report and to encourage the public to be aware and take helpful action.

Recommendation 5

People and organisations that communicate about homelessness in public should agree a common approach to framing, messages and calls to action about homelessness. This will help members of the public and volunteers have a clearer idea about what they can do in the short term to help people who are rough sleeping or homeless, and in the longer term what they can do to help end homelessness.

As part of this partners should:
- Deliver a public awareness campaign, building on the recent 'Play Your Part' campaign led by Cymorth, recent campaigns led by the Welsh Government, and the Housing First Network's communication group. It should draw on the insight and evidence on framing homelessness and on public understanding of homelessness in Wales.
- Set objectives for the campaign to bring about changes in public attitudes and public behaviour towards people experiencing homelessness and to help the public take action to end homelessness. People should feel informed and prompted about the short and longer term actions they can take. At key points in the campaign partners should monitor and evaluate against these objectives.
- Promote human interaction, kindness and compassion between people who are experiencing homelessness and members of the public, businesses and other people
- Encourage faith-based and community-led approaches that will help support people out of homelessness in the shorter and longer term.

---

[34] 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.

[35] 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.

Preventing rough sleeping

These recommendations should be read with the previous recommendations for reducing rough sleeping in the short term leading up to the winter of 2019-20. Many of those very short term recommendations should continue as the means for supporting people who are already rough sleeping at any given time.

These recommendations on preventing rough sleeping beyond the very short term should also be read along with the forthcoming recommendations from the Action Group on homelessness prevention. The forthcoming recommendations will go 'upstream' from the crisis point of rough sleeping and across the five categories of prevention this report mentioned earlier. These recommendations also build on the existing local homelessness strategies and work to prevent homelessness under the Housing Act 2014.

Ultimately, we can only end rough sleeping by ensuring all forms of homelessness are rare (prevented as much as possible), brief (responded to quickly) and non-recurrent (ended sustainably so it is only ever a one-off experience for people).

Working across public services

People continue to become homeless and are forced to sleep rough following time in state institutions, such as prisons, the armed forces, and the NHS and social care systems. In many cases, people have been discharged directly into avoidable homelessness, which can be very harmful to the person and incurs extra costs to public services (according to one estimate, if 30 people have to sleep rough for 12 months this costs an extra £600,000 per year, rising to £1.2 million if this continues for two years).[36]

There are pathways agreed between public services for people leaving institutions, such as prison, the care system, and health settings to be discharged into housing. However, they are not working, as people are clearly still being discharged from public organisations into homelessness and rough sleeping. Data from the most recent rough sleeping count questionnaires across Wales found:[37]

- A "large number" of people sleeping rough had recently been in custody, most within three years and 49 per cent within 12 months.
- A "large proportion" of people had been in care before and a "significant number" had been in both care and custody.
- 37 per cent of people had been discharged from hospital with no fixed address, many of whom had gone back to sleeping rough.

Specific evaluations have recommended that the pathways for adults in the secure estate[38] and for health settings[39] still need to be implemented effectively. The Action Group agrees

---

[36] Pleace, N. (2015) *At what cost? An estimation of the financial cost of single homelessness in the UK.* London: Crisis
[37] Rowlands, B. and Williams, J. (2019), *Analysis of 2-week National Rough Sleeper Count Questionnaires November 2018.* WLGA, Local Authorities Housing Networks. February 2019. https://www.wlga.wales/SharedFiles/Download.aspx?pageid=62&mid=665&fileid=2182
[38] Madoc-Jones,I., Hughes,C., Dubberley, S., Gorden.C., Washington, Dyer,K., Wilson,F., Ahmed, A., Lockwood,K., Wilding, M. (2018) *Evaluation of homelessness services to adults in the secure estate: Main findings report*, para. 8.2

that Welsh Government, local authorities and their partners should ensure that pathways are effective in stopping people being discharged into homelessness from any public institution. This may include local partnerships for the prevention of discharge from public institutions into homelessness and, if necessary, changes to regulation or primary law.

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.[40]
- 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 teams[41] operating in larger hospitals; and housing advisers in other health settings, such as housing officers in Bodelwyddan Hospital in St Asaph, Caerphilly, St Cadoc's Hospital in Newport, Royal Glamorgan in Rhondda Cynon

---

[39] A. Ahmed, M. Wilding, A. Gibbons, K. Jones, M. Rogers, I. Madoc-Jones (2018) *Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014*: Final Report. Cardiff: Welsh Government, GSR report number 46/2018, para. 12.34

[40] 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

[41] For more information see https://www.pathway.org.uk

> Taf, and Llandough Hospital in the Vale of Glamorgan.
> - Revisit and re-promote the housing pathway for care leavers.[42]

There are many signs that a person may be at risk of homelessness and rough sleeping. Public services need to be aware of these signs and to be able to act on them and they can include:

- People staying on the sofas of friends, family or others.
- Households in social or private rent arrears.
- People with increased presentations to health services.
- Individuals experiencing or at risk of domestic abuse.
- Children arriving at school in distress or hunger.
- Children and young people experiencing multiple Adverse Childhood Experiences and/or in touch with youth services.
- People who have 'no recourse to public funds' as a result of their citizenship status.

People who could identify risk include the police, landlords, youth services, health professionals, teachers and other school staff. They need to be aware of the measures they can take to help prevent or rapidly respond to risk of homelessness.

Many of the necessary actions for the wider group of professionals are set out in the homelessness prevention duty for local authorities in the Housing (Wales) Act 2014, and all of the actions are possible already. However, there is a case to consider whether all public bodies and bodies receiving significant public funding should be duty-bound to help prevent homelessness and to co-operate in preventing and relieving homelessness and rough sleeping. This approach builds on Recommendation 2 and the idea of ensuring public bodies to 'whatever it takes' to prevent and resolve rough sleeping quickly.

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.

---

[42] 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

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 the rough sleeping does not happen.

Making homelessness brief and non-recurring

In many cases, the best option for a person (and, if relevant, their family) is to stay in the home they are already in and not to be homeless in the first place, and not be at risk of rough sleeping. However, there are cases where this is not possible or desirable (e.g. if someone's personal safety is at risk or they are in a harmful relationship), but the situation should be addressed at the earliest opportunity.

When someone is actually likely to lose their home, most people need quick access to a mainstream and permanent home with some level of support. This should be the default assumption. The prevention of homelessness (including through tenancy sustainment) and relief are consistent with the work local authorities already do to prevent homelessness under their duty in the Housing (Wales) Act 2014.

If someone has support needs, especially if there are particularly complex needs (e.g. if there is a significant mental health issue and dependency), then Housing First is proven to be the right option. This assumes that any Housing First support is fully tried and tested and shows fidelity to the well-evidenced approach. In a small proportion of cases, primarily for reasons of safety of the individual or others, or through choice (for example, for a young person), then more specialist care and housing may be needed temporarily or permanently.

While the evidence for Housing First is "exceptionally strong" for a housing-related support intervention for rough sleepers it is not a panacea.[43] It is suitable for people with more complex support needs and must be delivered with the full fidelity to the model. 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, such as Critical Time Interventions.[44]

The Homelessness Action Group will make full recommendations on this approach when it answers its Question 3, on how to establish a rapid rehousing approach across Wales. However, for this report it is important to show what role rapid rehousing can have in ending rough sleeping specifically.

Recommendation 8

---

[43] Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London, p. xi
[44] 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

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 the complement existing prevention work. This cost will need to be modelled as part of the process of developing Rapid Rehousing Transition Plans.
- Provide national leadership on the scaling up of Housing First, including ensuring adherence to the well-evidenced fidelity model and use fo every individual who needs this particular solution.

Local authorities should:
- Define a Rapid Rehousing Transition Plan (RRTP) 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 develop of RRTPs in Scotland, e.g. the Glasgow Homeless Network has written guidance on how to develop a transition plan.[45] Rapid rehousing transition plans 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.

No evictions from social housing into homelessness

Recent research commissioned by the Welsh Government about social housing evictions in Wales shows that practice is extremely variable, ranging from 0.0 to 9.9 evictions per 1,000 units.[46] Community Housing Cymru has expressed support for an approach of no evictions into homelessness but has said the provision of housing-related support services will need to be increased in order to help housing associations achieve this, alongside better developed partnership working between housing associations, local authorities and support organisations.

The Welsh Government should therefore increase funding for the Housing Support Grant to enable local authorities to commission more housing-related support services that will help people to maintain social tenancies. Training in psychologically-informed environments should also be made further available to social landlords, particularly in relation to their housing management functions to help them create the conditions and develop the practices needed to reduce evictions.

---

[45] Glasgow Homeless Network's guidance and templates for Rapid Rehousing Transition Plans: https://www.ghn.org.uk/rapid-rehousing-transition-plan/
[46] Opinion Research Services (2019) *Understanding Social Housing Evictions in Wales*; https://gov.wales/sites/default/files/statistics-and-research/2019-07/understanding-social-housing-evictions-in-wales.pdf

For social housing in particular there must be a new settlement. The Action Group noted the wider debate about regulation in this area, e.g. housing association regulations and/or a regulator with powers to address homelessness. However, the Action Group also noted the importance of making sure each element of the system is working to achieve the desired outcome of no evictions and the importance of making systemic changes to ensure:

- A supply of housing stock that is affordable to people at risk of homelessness and in communities that help people build their lives.
- Allocations processes that ensure people at risk of homelessness can access the affordable housing stock.
- Access to support to sustain tenancies and prevent homelessness.

These changes can be linked with the response to the affordable housing supply review. While the Action Group did not rule out the fact that regulation might be needed in the longer-term, this report recommends a 'pact' between Welsh Government, local authorities and social housing providers to progress a 'no evictions into homelessness' policy in the shorter 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.

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.[47]
- 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.
- 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.[48] 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

---

[47] CORE data: https://core.communities.gov.uk/
[48] 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

> 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 RSLs should accept a duty to prevent homelessness.

A right to adequate housing

A right to adequate housing should be the principle underpinning support for people at risk of homelessness. This should be reflected in law and its guidance but also needs accompanying in practice, for example by building enough social housing to meet the needs of people at risk of homelessness or on low incomes. One study of social housing need in Wales estimates that 4,000 additional new social homes are needed every year for 15 years to address backlog and provide for need.[49]

As well as truly affordable housing there is a need for support services to extend and protect the right to adequate housing. Recommendation 2 noted current barriers to supporting people who take drugs, partly due to the law. Policing of drug legislation disproportionately affects people who sleep rough and have other vulnerabilities.[50] Data also suggest that 1 in 10 people who inject drugs are admitted to hospital each year across the UK as a result of harm from the unsafe conditions on the street. This can have a "substantial impact" and there is a risk of death or life-changing injury or amputation due to infections.[51]

There are policy interventions proven to work for people with these support needs and to deliver the basic human need for housing and support. The evidence says Housing First has been "proven to be highly effective" to support people with co-occuring substance use and/or mental health problems.[52] While there has been a visible increase in the number of people who might need this support, estimates suggest the overall number is relatively small (around 600 people who would benefit from Housing First support across Wales).[53]

> **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

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

[50] 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

[51] Public Health England (2018), Health Protection Scotland, Public Health Wales and the Public Health Agency (Northern Ireland) Shooting Up: Infections among people who inject drugs, 2017 – November 2018 update https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756502/Shooting_up_2018.pdf

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

[53] Blood, I., Goldup, M., Peter, L. and Dulson, S. (2018) Implementing Housing First across England, Scotland and Wales. Imogen Blood & Associates. London: Crisis and Homeless Link, p.21

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.[54] There was cross-party support for this when recommended by a National Assembly committee.[55]
- 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.[56]
- Work with Substance Misuse Area Planning 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').[57]
- 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.

Commissioning of services for people rough sleeping or at risk

We heard from the consultation with people working in housing and homelessness roles that longer-term funding is one of the clear priorities along with increasing accommodation supply and better referral routes with non-housing services.[58]

Commissioning, and therefore funding, needs to be on a sustained and long-term strategic basis (e.g. to bring about a 'no first night out' and rapid rehousing approaches) rather than promoting short-term bidding and short-term outcomes. Welsh Government can provide a

---

[54] Mackie, P. and Thomas, I. (2016) *Transitory single homelessness in Wales*
[55] 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
[56] 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
[57] 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
[58] The fourth highest priority was 'Longer funding periods for services commissioned by Welsh Government and/or local authorities' with 80 per cent of respondents saying this is 'very important' and 18 per cent saying it is 'important'.

strong lead in bringing this about by using longer-term commissioning guided by a strategy to end homelessness to help partners plan and deliver against this and to recruit and retain high quality staff.

Commissioned organisations need to be supported to provide psychologically-informed and sustainable support including assertive and empowered outreach, a diverse set of appropriate emergency accommodation settings, and a context of the default of homelessness services to be rapidly rehousing people in permanent, mainstream housing and accommodation with the right level of support if required.

The commissioning process needs to promote multi-agency and joined-up working with housing and homelessness solutions working effectively alongside health, justice, mental health, domestic abuse, and drug and alcohol services. Further work is needed to establish exactly what steps are needed to do this but it is likely to involve place-based strategic plans for ending homelessness as a mechanism for achieving joint budgets enabling joint commissioning. The Homelessness Action Group will be looking at this question in more detail in a later report.

Commissioning organisations should be held accountable for the right long-term outcomes, integrated with other measures to address poverty, inequality and destitution. This should operate under the principles of the Future Generations Act. For homelessness and rough sleeping specifically, outcomes should include a sustained reduction in rough sleeping to zero, and reductions in other forms of homelessness, such as 'sofa surfing' and stays in hostels.

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 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.

Data on rough sleeping

There are two broad types of data on rough sleeping – and wider forms of homelessness – that are particularly valuable. For governments, commissioners and policymakers there is a need for aggregated data on what works, e.g. which interventions are particularly effective, to better understand the problems and solutions in homelessness, and for tracking national, regional and local progress towards policy goals. For individual services and workers there is also a need for more immediate case data, so that when they encounter a person sleeping rough they can access reliable and useful data about the person and their history.

Welsh data does not currently fulfil either of these needs. The national rough sleeping count is only a point-in-time snapshot of overall trends and likely undercounts the actual prevalence of rough sleeping, which the Welsh Government acknowledges.[59] Local authority data on homelessness only gives part of the picture, given it provides information only on households accessing the support system at specific points in time. There is work under way to improve this, including the exploration of individual-level data and the rollout of the Street Homeless Information Network (SHIN).

SHIN represents an opportunity to go further than existing provision elsewhere (such as the CHAIN system in London), for example to link people who are rough sleeping with statutory data so that support providers know if a person has previously been in touch with a local authority and include wider sources of information, not just data from commissioned services. A recent options appraisal by the Centre for Homelessness Impact for the Scottish Government is a useful reference for this recommendation.[60]

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.

---

[59] Welsh Government (2019), *National Rough Sleeper Count, November 2018*. Published 5 February 2019, SFR 8/2019.
[60] Russell, D. and Thomas, I. (2019) *Better Data, Better Results - an options appraisal for a national data and monitoring system for street homelessness in Scotland*. Scottish Government and Centre for Homelessness Impact.

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.