

## **Consultation Response from Scrutiny Programme Committee**

### **Draft Homelessness Strategy & Action Plan 2018-2022**

The Committee appreciates the opportunity to discuss the draft Homelessness Strategy and Action Plan 2018-2022 on 1 October 2018 with the Cabinet Member for Homes & Energy and key officers involved in developing this work, Steve Porter and Rosie Jackson. We credit those involved in the production of the Strategy and extensive Action Plan.

With the benefit of this discussion this document contains the views of the Committee on the draft Strategy and Action Plan to feed into the consultation process which we hope will help inform the preparation of the cabinet report and final Strategy in November.

We will be arranging a pre-decision scrutiny meeting to look at the cabinet report and to hear how the views of the Committee that follow have been considered, and response to issues raised.

We noted that although there is legislative requirement for Strategy is to be implemented by the end of 2018, any agreed Strategy will be open to amendment at any time i.e. flexibility is a given and over time the Strategy and actions may need to be modified, adapting to changing circumstances / environment, to ensure it remains fit for purpose.

#### **Specific Comments:**

##### **Objective 1: Ensuring service users are at the centre of service delivery**

**Key Priorities Section 11.6 (Service User Involvement)** - We welcome that there will be a focus on ensuring that the principles of co-production are incorporated into the design and delivery of services, and that the development of a Homelessness Charter and Service Standards will be co-produced. This should enable people with experience of homelessness to be meaningfully involved in planning services. Better service user involvement and equalities monitoring is necessary, to ensure services are accessible to all. There is a need to ensure however that there are robust methods in place for doing this so we ensure it is not just a tick-box exercise.

##### **Objective 2: Prioritising early intervention and prevention of homelessness**

We welcome the plan to develop an education programme to increase knowledge of housing and homelessness issues in partnership with young people to improve homelessness prevention services for young people. It is not clear however how this will be developed – it could be good opportunity for co-production with our schools and colleges and other organisations, who we would expect to want to be part of this, as well as of course service users.

We welcome the development of pre- eviction protocols with all housing providers and work to understand reasons for abandoned tenancies.

Noted:

- Whilst every effort would be made to avoid evictions, including supporting tenants with rent arrears from the Prevention Fund, the safety of staff, people and communities will be paramount.

It is noted that in **Objective 2.1** of the Action Plan it is the intention to monitor evictions accurately across all forms of housing and to have this in place by March 2020. We would ask what resource is envisaged as being needed to deliver this action. Also, whether regular statistics be published by the council and where will they be available.

**Section 9.3: Profile of Homelessness / Objective 2.6 (Monitor reasons for loss of rented accommodation in order to better understand the drivers behind this cause of homelessness)** - The loss of rented accommodation remains the biggest single cause of homelessness (18%) both in Swansea and across Wales. It is not clear how activities to improve understanding of impact of welfare reform on tenancy sustainability, and monitoring to fully understand and evaluate other reasons for loss of accommodation, are going to reduce evictions from private rented accommodation when landlords cannot be compelled to provide accommodation.

There is some concern about a lack of one-bedroom properties across Swansea available for rent that would help increase supply of suitable accommodation.

Noted:

- The Housing (Wales) Act 2014 presents a fundamental challenge as it expects a greater use of private rented sector to discharge statutory homelessness duties.
- Many private rented sector properties are being used, and we want to get more landlords on board, for example through increased advice and support, to facilitate greater access to the sector to alleviate homelessness. There is much that can be done to reduce evictions.
- The Housing into Homes Loan Scheme (for empty properties) is helping to increase the supply of private rented accommodation, where landlords can access loans to bring properties up to standard with agreement to then let to a Council tenant for 48 months
- The Council will be looking at all Council land – East or West – for future house building projects. The increasing demand for 1 or 2 bedroom properties is acknowledged.
- The Council does talk to other house builders, including RSLs about the need for more smaller properties, and talks to neighbouring Councils about what they could do to help each other and support efforts to tackle homelessness across the region e.g. Neath Port Talbot Council has recently increased its supply of temporary accommodation flats which may have a positive effect on rough sleeping in Swansea.

In **Objective 2.11** it is envisaged that the council carry out a mapping exercise on existing mediation provision by October 2019, including how they are accessed, availability funding arrangements and good practise here and elsewhere. We would ask what mediation is currently available in Swansea, and whether the council envisages having to set up a stand-alone service to meet the demand for this service.

### **Objective 3: Ensuring suitable accommodation is available for people who are or may become homeless**

**Key Priority Section 11.4 (Access to Permanent Accommodation) / Objective 3.1** - This identifies a need to increase access to the private rented sector and work closely with Registered Social Landlords (RSLs) to set out and agree expectations to identify how the social housing sector will work together to alleviate homelessness. However, in the action plan the timescale for written agreement with RSLs seems too long (April 2021), given that we have already been working closely with housing associations for some time – why such a long run-in time to deliver on this aspiration? Also, is it now time to develop a common waiting list with RSLs that will incorporate the allocation of housing by need across the sector?

Universal Credit has made access to housing for people more difficult. It is not clear how the Council will work around this issue.

Noted:

- It may take time to get this work embedded and requires 3 RSL partners to be signed up to this.
- Action plan timescales are affected by other priorities e.g. developing Housing First approach.
- A common waiting list has been discussed previously and is problematic and too simple an answer to a complicated issue, but better relationship with RSLs and working together will help deliver improvement.

**Objective 3.4 (Reduce the use and length of time spent in temporary accommodation for homeless households with complex needs [i.e. Mental Health issues & Learning Disabilities, substance misuse] spend in temporary accommodation)** - It is not clear what specialist supported accommodation is envisaged, and whether Social Housing Grant has been earmarked for such developments.

Noted:

- More supported housing is not necessarily the answer here
- The Housing First approach, with wrap around support, may be more successful in getting people out of temporary accommodation more quickly
- Stopping evictions is perhaps more important than developing more supported housing projects

In **Objective 3.7** the plan is to reduce barriers for accessing temporary accommodation and supported temporary accommodation, such as pets, storage of belongings and work / finance. In the case of pets this should be straightforward, so would question why it is envisaged to take 18 months to put measures in place to achieve this.

**Objective 3.12 (Consider feasibility of establishing social lettings agency for private sector properties)** – the Strategy would benefit from some more detail about what this means in practice.

#### **Objective 4: Ensuring appropriate support is available for people who are or may become homeless**

**Key Priorities Section: 11.3 (Support)** - There is concern that the Action Plan seems to be vague about specific proposals and timescales to meet the increased need for support for people with mental health / complex needs, and provide a more flexible and responsive support service to ensure that people receive the right support at the right time.

Noted that:

- Some actions can only be delivered with the help of our partners such as the local health board.
- Some actions are aspirational, some cautious, and in some cases actual delivery may exceed plan and timescales.
- The development of a Housing First approach will involve us procuring mental health expertise to improve upon current position, and will focus on accommodation of people with complex needs, to reduce levels of rough sleeping.

**Objective 4.9** – We welcome recognition of the need to map the provision in place to assist and advise individuals who are ineligible for homelessness and housing assistance due to immigration status. We fear an increase in the numbers of rough sleepers because of such ineligibility.

Noted:

- The Council is not legally able to provide assistance however there are third sector organisations (e.g. Crisis and Welsh Refugee Council) that could help, and we can work with them to ensure those in this situation can be directed to resources available to help them.

We would ask whether there ought to be action to improve support for basic tenancy management such as managing finances, shopping and maintaining a property.

#### **Objective 5: Providing robust responses to support rough sleepers and eliminating the need for individuals to sleep rough**

**Objective 5.1** – We welcome the plan to carry out a feasibility study to look at developing a holistic “solutions centre” for services for rough sleepers, to improve facilities for those who are vulnerably housed and sleeping rough. We would suggest this would benefit from being co-produced. Our Scrutiny Working Group on Homelessness also found the need for such a centre, with overwhelming support across the third sector following the closure of the Cyrenian’s project at St. Matthews. Although we recognise this would be an ambitious project is it not more pressing than the 2 ½ years identified to carry out feasibility study alone. We feel that in the interim there could be actions (small steps) that could help to build up to such an outcome – rather than the apparent all or nothing approach. The objective should be carefully worded so as not to be misleading about what we are trying to achieve.

Noted:

- The Strategy will represent a starting point, and is ambitious in many respects through a desire to achieve excellence, but can be modified if it is felt that this project is no longer the best option, and resources committed to other solutions that best fit the objectives. The Strategy highlights the need and gaps – how we address these is still up for discussion.

In **Objective 5.2** you outline the council's intention to develop a Housing First approach, which was also supported by the Homelessness Scrutiny Working Group and is very welcome. However, we would want to see specific performance measures that will be put in place to monitor the success of this project.

In **Objective 5.6** you say that the council will be developing an information leaflet for the general public and local authority councillors on support available to assist rough sleepers. It would be beneficial for this to be supplemented by on-line information, and if possible by developing or utilising existing apps for this purpose.

In **Objective 5.9** you say that a review with social services and ABMU on the need for rough sleepers and vulnerable households to have better access to health, including mental health services will take two years to be completed. Given the identified need and the urgency in resolving this matter, it is not clear why this will take so long.

### **Rights of the Child / Dependent Children**

Whilst there are references to children in the Strategy there is little about dealing with and supporting children affected by homelessness by virtue of dependency on parent(s). We would like to see inclusion of clear statements about how their voice will be heard, or advocacy services that will be available, partnership working with education e.g. to ensure that education is maintained, and how the Strategy generally supports the UNCRC.

Noted:

- There has been consultation with young people through relevant organisations
- Efforts are made to ensure least disruption for children – e.g. unnecessary school moves
- Safeguarding is an underlying principle running through the Strategy

### **Section 6.3: Links to local strategies**

It is important that all strategies are compatible with the Homelessness Strategy.

### **Section 9.2: Housing Market in Swansea**

Section 9.2 of the strategy refers to the Local Housing Market Assessment, which was updated in 2015 and which has identified a requirement between 2010 and 2025 for an additional 17,100 new dwellings in Swansea, of which 7,400 need to be a mix of affordable rent or sale. The Committee would question how many of these

have been delivered in the last eight years, and what the current position is in relation to meeting this target.

### **Section 10: Future Levels of Homelessness**

**Welfare Reform** - We would ask what additional measures are being put in place to meet a growing demand for advice and support as welfare reform continues to be rolled out.

**Housing Costs for Supported Accommodation** - The intention of the UK Government to change the way it funds housing costs such as rent and eligible service charges for short term accommodation by devolving this to the Welsh Government from April 2020 is noted. We would ask what discussions have taken place with the Welsh Government as to the likely model it will adopt to distribute this funding to supported accommodation schemes, and whether the amount passed to the Welsh Government will be frozen at current levels leading any growth in demand to be funded from existing Welsh budgets.

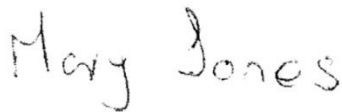
### **Section 13: Monitoring, Evaluation & Review**

It is helpful to know where the monitoring, evaluation and review will be reported. Whether it will be reported to Council annually etc.

Noted:

- In addition to regular internal monitoring (quarterly) there will be an annual Cabinet progress report, which will be visible to all councillors and the public.

Yours sincerely,



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