



Ending homelessness: A high level action plan 2021-2026

CIH Cymru consultation response

This is a response to the Welsh Government's consultation which seeks views 'Ending homelessness: A high level action plan 2021-2026'.

Introduction

Addressing homelessness, and its causes, has been a constant feature of the work of the housing profession. This profile of this work has been elevated during the pandemic as the focus intensified on ensuring each and every individual in Wales was able to access somewhere safe to call home – albeit, often on a temporary basis.

Alongside many other organisations across the UK, we have raised concerns around affordability and the potential of a surge in demand for housing advice and support. This affordability crisis is fuelled by the removal of the £20 uplift to Universal Credit, the ending of the furlough scheme and sharp increases to the cost of living.

We support the Welsh Government's clear message in reflecting on progress made during the pandemic to address homelessness in all its forms that there can be no going back to the pre-pandemic reality. We are concerned however, given the challenges around affordability and the resources available to ensure local authorities can adequately respond to demand, that the task ahead is huge.

We strongly welcome that this action plan intends to build and progress the momentum brought about by a combination of stakeholders during the pandemic in addressing homelessness in a holistic way. We particularly welcome the flexibility built into the plan, with the opportunity to amend, change and refine actions on an annual basis.



Q1 The Action Plan is split into four key areas of focus (Partnerships, Rare, Brief and Non-recurring). Do you agree that these are the right areas of focus / themes to focus the plan around?

☒ **Yes**

☐ **No**

☐ **Partly**

Please explain why you consider the areas of focus / themes are right or if you think a different approach is needed?

We have always been supportive of the view that in principle, homelessness should be rare, brief and non-recurring. Alongside partnerships which are so key to taking forward solutions under the rapid rehousing approach, this feels like a sensible way to split for four key areas.

To ensure there's a clear link between these areas of focus on the high-level actions, it would be useful to further refine the table to reflect which actions correspond to which focus – appreciating that some will be cross-cutting in nature.

Q2 Do the actions in the Action Plan reflect the most effective high level steps that will enable the Welsh Government and its partners to end homelessness in Wales?

☐ **Yes**

☐ **No**

☒ **Partly**

How can they be improved?

A rights-based approach to housing

As both an individual organisation and as part of a wider coalition under our 'Back the Bill' banner alongside Shelter Cymru and Tai Pawb, we have been a leading



voice for a rights-based approach to housing in Wales. In practice we believe that a right to adequate housing should be enshrined in Welsh law.

A Bill for the right to adequate housing would create a legislative framework to help address and measure progress against some of these key issues further:

Homelessness: ensuring we build on some of the measures taken during the COVID-19 crisis, including maximising investment in social housing and support

Security of tenure: strengthening the position of Welsh Government in its rights-based approach, better balancing the rights of tenants to live in security with those of private landlords

Accessible housing: ensuring proper consideration of disabled people's rights in a housing context, giving them a voice to have those rights recognised and, if needed, enforced

Black, Asian and minority ethnic people, young people and other minority or disadvantaged groups' access to affordable housing: where local authorities would need to consider the needs of particularly disadvantaged groups in the development of local strategies and the supply of affordable homes

Resource: will push housing up the policy priority list and in turn ensure increased focus of resource and investment, tackling the chronic under-supply of housing as well as support services

Whilst we recognise the government's support in principle for a rights-based approach as we describe it, and understand concerns around having sufficient supply to meet any duties in practice there is a real opportunity to at least include reference to the approach in the plan. The opportunity to do so seems even greater in that the plan allows for actions to be completed over a longer period of time. We would be supportive of any type of reference from the outset – from demonstrating full support for such an approach through to (for example) highlighting that the idea has merit and should be the subject of further exploration and consideration.

Gathering insight from the sector

Although the plan clearly references evidence gathering activity, there is an opportunity to feature insight gathered from professionals. We know that often individuals working to deliver services have a significant understanding of both what works well and what could be improved in practice.



This data could be gathered through ongoing surveying of professionals and that intelligence used to inform how resources are allocated and how the plan is refined over the course of time.

For example, [our own work in surveying local government housing professionals](#) found that managing the impact of the COVID-19 pandemic has placed considerable pressure on staff working in housing and homelessness services. Our research found:

- 49% of respondents were driven by their desire to help people – with working as part of a team also underpinning their desire to work within local government housing
- Almost a third (30%) felt that effort to house people experiencing homelessness to provide protection and limit the spread of COVID-19 was one of the key positive actions to come about as a result of the pandemic
- Staff felt that the move to remote working had improved the use of time and team efficiency, but that careful balancing to ensure staff do not feel isolated is needed
- A combined lack of housing stock, staff capacity and the need to manage the impact of COVID-19 on top of already busy day jobs combined represent the most significant pressures facing local government housing staff
- More affordable housing and more staff were highlighted as solutions to those pressures in addition to an easing of the pressure from the Welsh Government in terms of deadlines to put forward projects and apply for funding,
- Over 80% of respondents felt that if housing targets are to be met, land supply/availability and resources will be required to support their achievement
- In considering the strength of partnerships between the housing department and health and social care services, 86% of respondents had either some or no confidence in these arrangements



Increasing housing supply, housing choice and improving access

We strongly support Welsh Government target of delivering 20,000 low carbon social homes over the coming years. The plan is at present, quite simplistic in how it considers the action around delivery of the target. Whilst we recognise it would not be appropriate for a high-level plan of this kind to go into detail about the nature of the challenges in this area, there should be scope to relay some of the existing challenge linked specifically to this aim. This could include:

- Including an action around land costs – recognising that although building as close as possible, or within existing town and cities should be a desirable starting point, the cost of doing so, particularly for providers of social and affordable housing is often prohibitive.
- The type of homes we build should be given parity with the importance of reaching the numerical target. In a survey of over 300 tenants in North Wales, our work focussing on rightsizing (detailed further below) found that flats, particularly first floor flats, were particularly undesirable. But flats often play an important part in ensuring developments reach viability, creating a clear tension between what can be delivered in practice, and what may seem like an attractive housing prospect.
- How the Welsh Government's scrutiny of new developments, and its interpretation of value for money could include consideration around how a scheme will seek to meet urgent unmet housing needs.

Having enough homes is one part (albeit a very important part) of the puzzle, using valuable resource of our existing homes more effectively also needs careful consideration. Our [Time to refocus?](#) report focussing on social housing allocation systems found that:

- The variety of ways through which a person can seek to access social housing in different parts of Wales can cause confusion
- Some of the systems can place people with an unrealistic expectation of being allocated social housing
- There is a need to demonstrate the direct connection between Social Housing Grant and homes built to meet the needs of people in acute housing need

[Our work in North Wales](#) focussing on how housing providers can better help people who may be in homes that are too large or too small to meet the needs of



their household echoed some of these challenges finding that:

- True housing need is often hidden by people not joining waiting lists due to the realities of waiting times of some properties that may be more desirable due to location, size (often larger family homes) or type (predominantly bungalows). When this demand does not present itself on housing need registers local authorities do not have the data needed to take a full view of the type of homes/developments required in different areas
- Whilst there is not a strong push towards building single persons accommodation, this can play an important role in increasing housing mobility. There is a further need to link government-grant to activity that not only delivers more homes but contributes to increasing housing mobility amongst local populations.

Q3 Does the Action Plan align with other relevant areas of policy and practice?

☐ **Yes**

☐ **No**

☒ **Partly**

Please explain why it aligns well or outline how it could be made better?

It is encouraging to see that the plan has clear links, and places responsibility in other sectors whose activity and work remains vital to delivering a holistic approach to addressing and ending homelessness.

Health and social care feature a number of times, which whilst being a focus we strongly welcome, there is a risk that existing gaps between these services may not be identified by the action plan itself.

Our research focussing on [the role of housing advice during hospital discharge](#) shed a further light on this area, highlighting opportunities to improve practice:



- Staff do not tend to follow a clear protocol on hospital discharge, often relying on local conventions
- The lack of temporary accommodation because of the COVID-19 pandemic is creating increased challenges in discharging people at risk of homelessness or those whose home may be unsuitable following their hospital stay
- Staff in specialist roles who before the pandemic worked in a hospital setting now rely on non-specialist staff to communicate their advice and guidance
- The presence of a housing expert in a hospital setting can improve timely advice for professionals and patients
- Patients who are not formally admitted to hospital do not get information that could keep them well at home
- Delays to adaptations, the need for ongoing care, and complications whilst in hospital all cause delays to a patient being discharged
- Approaches that involve a wide range of professionals in discharge planning increase the likelihood that patient needs are considered holistically - although sometimes the involvement of key professionals, like housing staff, can come too late
- The use of multiple IT systems can make it harder to share up to date information that is accessible to all staff

Q4 We have developed a number of key actions and milestones. Do you feel these are the right ones?

☐ **Yes**

☐ **No**

☒ **Partly**

Please provide additional comments

The milestones listed seem sensible - although some do seem more dependent on the availability of future resources to deliver.

There may also be opportunity to mirror/link to other types of milestones that impact the sector – such as those considered under the Well-being of Future Generations legislation.



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Q5 Do you think there are any key areas for action not captured by the high level actions? If so, what would they be?

Please provide additional comments

We believe there is scope to include reference to housing quality, on a cross-tenure basis. We know that this is an intensive area of activity for our members working to improve both the quality and efficiency of existing homes. The plan should re-enforce that our response should not only be about building new homes, or better utilising existing homes in addressing homelessness, but also recognise that housing needs to be of a sufficient quality to offer a sustainable solution that enables a desirable quality of life.

About CIH

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

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