Wales Safer Communities Network response to:
Ending Homelessness Outcomes Framework Consultation
Closed 18 September 2023

Response submitted via the online survey.

Question 1
The Ending Homelessness Outcomes Framework identifies six overarching strategic outcomes:
1. Rare
2. Brief
3. Unrepeated
4. Workforce
5. Public Service response
6. Person-centred approach

Based on the key principles of the framework (in section three), to what extent do you agree the above areas are the right strategic focus for the framework?
• Strongly agree
• **Agree**
• Neither agree nor disagree
• Disagree
• Strongly disagree

If 'strongly agree / agree' - Please explain why you consider these strategic outcomes are the right areas to include in the Framework
Ending homelessness requires a partnership and collaborative approach. The reasons for homelessness can be complex and require holistic approaches building on evidence-based approaches that can deliver for individuals and families who are homeless or at risk of becoming homeless.

If 'strongly disagree / disagree' – Please explain what strategic outcomes should be excluded; or others that should be included.
Not applicable

Please consider the Key Principles in Section 3 of this document when proposing suggestions.
We agree with the key principles proposed, whilst ambitious are fair, clear and have a focus on the prevention of initial homelessness and on the prevention of future occurrences, which we think will give the correct focus for the framework.

Question 2a
Are there any additional detailed outcomes that you think should be included?
(please refer to the definition of detailed outcomes on pages 15 – 28)

- **Yes**
- No
- Don't know

If yes, please list those you think can be improved and why.
We would suggest that you consider the Key Principles in Section 3 of this document when proposing improvements.
We are not sure if it would be in addition or if just an amendment to one of the existing ones which is for public services and other services and support to prevent homelessness or to get the homeless into housing should work together in partnership to ensure the best possible outcomes. It could be with reference to the Wellbeing of Future Generations (Wales) Act 2015 five ways of working or through other means.

Question 2b
Are there any proposed detailed outcomes that you think should be excluded?
- Yes
- **No**
- Don't know
If yes, please list those you think should be excluded and why.

Question 2c
Are there any proposed detailed outcomes that can be improved?
- Yes
- No
- **Don't know**

If yes, please list those you think can be improved and why.
We would suggest that you consider the Key Principles in Section 3 of this document when proposing improvements.
Please see our comment under question 2a. In addition there may be something around ensuring appropriate and safe housing whilst this is partially covered under unrepeated we think that it could be strengthened, especially when thinking of the vulnerable, those with physical constraints as well as hate crime and domestic abuse survivors and victims.

Question 3
Equalities, anti-discrimination and human rights underpin our Ending Homelessness Action Plan to recognise the barriers of inequality, discrimination and marginalisation that particular groups are much more likely to face.
We have attempted to reflect this in the EHOF through:
- Rare: Detailed Outcome 2 - Groups at greatest risk are identified and measures put in place so that fewer people in those groups experience homelessness and
- Strategic Outcome 6: Person Centred, and underpinning outcomes.

To what extent does the outcomes framework adequately help to measure progress against this overarching goal?
- Strongly agree
- **Agree**

- Neither agree nor disagree
- Disagree
- Strongly disagree

If 'strongly agree / agree' - Please explain why you consider the outcomes framework adequately helps to measure progress against this overarching goal?

There are specific mentions under Rare and Person-Centred, but other than specifically identifying children and young people there is no specifics of those most at risk of homelessness with protected characteristics. It may be appropriate to include and to link in with the LGBTQ+, Race Equality and Disability Action Plans and with the Child Poverty Strategy for Wales, work on anti-slavery and on the Armed Forces Covenant.

If 'strongly disagree / disagree' – Please explain why you don't consider the outcomes framework adequately helps to measure progress against this overarching goal?

Not applicable

Question 4

Unrepeated: Detailed Outcome 1 - People do not experience multiple episodes of homelessness identifies a data indicator (a) The number of households who received a relief duty (S73) who later (within X months) submitted a further homeless application (absolute, per 10,000 and as a proportion of all applications)

In respect of experience of repeat homelessness, what do you consider to be an appropriate timeframe to capture data for a household who has received a relief duty, and then (within X months) submitted a further homeless application?

 i) 6 months
 ii) **12 months**
 iii) Other (please specify)

Please provide reasons for your answer.

The timeframe is a balance of not being too short or too long, but if the majority of people who require short term support to be able to hold a tenancy normally receive it within six months, so they may not have had the opportunity to demonstrate that they are not going to experience another episode because they have only just begun to do so on their own. The risk of making the timeframe too long is that whilst the initial cause may be resolved that other causes out of the control of either the individual or family or those supporting them, such as increases in rent caused by the cost of living may occur.

Question 5 (a)

Unrepeated: Detailed Outcome 3 - People can access the right home in the right place.

We recognise this is a difficult outcome to measure and the proposed data indicators are currently not captured in existing data collections (although indicator b can be proxied using an indicator from the Housing First tracker by Cymorth Cymru in the interim).

Please set out for each of the potential future data indicators below, whether you think they can be used to measure progress against the outcome?

(a) Number and percentage of people who are sustaining tenancies 6 months after receiving support (Low/Medium needs)

- **Yes**
- No
- Don't know

(b) Number and percentage of people who are sustaining tenancies 6 months after receiving intensive housing led support such as Housing First (High Needs)
- **Yes**
- No
- Don't know

(c) Number and percentage of people who have stayed in supported accommodation who are sustaining tenancies 6 months after commencement of tenancy (Intensive needs)
- Yes
- No
- **Don't know**

If you have responded no to any of the proposed indicators please can you provide the reason for your response including any alternative data indicators you might suggest*.
We were unsure when it comes to those with intensive needs as the support is ongoing and therefore it may be more appropriate to count in a different way.

Question 5 (b)
Data indictors (a), (b) and (c) above refer to a 6 month timeframe for sustaining tenancies.
To what extent do you agree with this 6 month timeframe?
- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

We agree in principle especially for a and b for sustaining for six months after support provided, for those with intensive needs or longer term this may not be appropriate.

Question 6 (a)
Brief: Detailed Outcome 2 - Nobody experiences homelessness long-term identifies a data indicator (a) The number of households experiencing long-term homelessness (absolute and rate per 10,000 households)
What do you consider to be a suitable timeframe to measure long-term homelessness?
  i) 6 months
  ii) 12 months
  iii) Other (please specify)
Please provide reasons for your answer.
Under normal circumstances we would agree that six months would be long-term to be homeless, but with the current shortage of appropriate rented accommodation social and private this may not be reasonable and be setting partners up to fail. However, we still think that it should be the target for six months to be seen as long-term and not as the normal for the wellbeing of the individuals and families and for the benefit of community cohesion.

Question 6 (b)
Brief: Detailed Outcome 2 identifies a data indicator (b) The number of people experiencing long-term street homelessness (absolute and rate per 100,000 population)
What do you consider to be a suitable timeframe to measure long-term street homelessness?

i) **3 months**
ii) 6 months
iii) Other (please specify)
Please provide reasons for your answer.
Temporary accommodation provision should form part of the solution and whilst we think that three months is a long time to be street homeless, for some living in shared accommodation is not a viable option and needs to be considered if a holistic approach is being taken.

Question 7
Public Service response: Placeholders have been identified as potential data indicators for the future.
Are there any current data indicators which exist you would like to make us aware of relating to the wider public service response?
  • Yes
  • No
  • **Don't know**

If 'yes' - Please explain which existing current data indicators relating to the wider public service response.
Whilst our answer is that we don't know, we are keen to ensure that veterans are covered within "People are not discharged from other public services into homelessness" or possibly under a different indicator as the number of veterans returning to civilian life should be known.

Question 8 (a)
We would like to know your views on the effects that the Ending Homelessness outcomes Framework would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

What effects do you think there would be?
There could be an impact on the provision and access of education by children and young people whether they attend a Welsh Medium school or not, changing schools and any delays could reduce their access to Welsh.

Question 8 (b)
How could positive effects be increased?
We have no suggestion on how positive effects could be increased.

Question 8 (c)
How could negative effects be mitigated?
We have no suggestion on how negative effects could be mitigated.

Question 9
We also want to understand how proposed Ending Homelessness Outcomes Framework could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

How do you think the framework could be formulated or changed to have positive effect on the Welsh language?
Response:
We have no suggestions on how the framework can be changed to have a positive effect on the Welsh language.

Question 10
We have asked a number of specific questions. If you have any additional feedback about the Ending Homelessness Outcomes Framework, please record this here:
Response
The Wales Safer Communities Network in reviewing the framework were not sure how this would link in with those at risk of exploitation, such as cuckooing which can lead to a loss of safe housing. There also does not appear to be other areas of safeguarding covered which we would like to see included. In a similar way there does not appear to be reference to safe housing which could be for health purposes but also for safety from abuse, hate or gender based crimes (stalking, domestic abuse). There may also be something that needs to be included in regard to the devolved and reserved public bodies, with HMPPS for example being reserved along with police whilst councils and health are devolved.