



Llywodraeth Cymru  
Welsh Government

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Welsh Government  
Consultation – summary of response

## Ending homelessness in Wales: A high level action plan

November 2021

## **Overview**

This document summarises the consultation for the draft 'Ending homelessness in Wales: A high level action plan – 2021-2026', the responses provided against the consultation questions and the steps the Welsh Government proposes to take as a result of the feedback it has received.

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

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## **Additional copies**

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: <https://gov.wales/ending-homelessness-high-level-action-plan-2021-2026>

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## Introduction

The Ending Homelessness in Wales: A high level action plan [“the Action Plan”] builds on the Welsh Government’s Strategy for Ending Homelessness and the reports and recommendations of the Homelessness Action Group (HAG). It is an all age action plan, developed to provide policy direction and a set of high level actions to transform homelessness services to focus on prevention and rapid rehousing. The Action Plan is focused on the key steps that can be taken over the next five years to end homelessness in Wales.

The Action Plan is structured around four chapters which address how ending homelessness will be achieved through *partnership working*, ensuring it is *rare* (linked to effective prevention), *brief* (linked to rapid-rehousing) and *unrepeated* (linked to support, and effective supply, availability and access to housing), which are key themes from the HAG reports.

An early version of the document was shared with members of the Welsh Government’s Homelessness and Housing Support National Advisory Board (HSNAB), to identify potential changes to the four policy chapters and the list of actions. The HSNAB themselves will be developing proposals to address specific actions within the HAG reports, therefore their combined efforts shaping the Action Plan should make a significant difference to ending homelessness in Wales.

## Consultation process

Between 4 October and 12 November 2021 the Welsh Government held a consultation on a draft version of the Action Plan. The six week consultation period reflected the settled nature of the policy proposed by the Action Plan, with significant elements having been informed by the recent reports of the HAG, which themselves had been developed through extensive engagement with partners in the housing and homelessness sector and people with lived experience of homelessness.

The draft Action Plan and consultation document were published online in Welsh and English. Partners in local authorities, Third Sector organisations and other relevant groups were notified of the consultation when it began.

The consultation sought to identify whether the Action Plan represented a fair and balanced approach through the proposed policy approach and in the actions themselves. Eight questions were asked in total, which led to 51 responses being submitted during the consultation period; a further five responses came in after the consultation closed and have been reflected in this report. The responses were provided by public sector, Third Sector, representative organisations and individual respondents. Seven responses were provided where no name or organisation was given or where the respondent asked for their response to be treated anonymously (a full list of respondents is provided at Annex A). Some respondents provided partial responses, answering some but not all questions, or provided more general observations on the Action Plan.

This Report summarises those responses under the most appropriate question.

## Summary of responses

**Question 01:** The Action Plan is split into four key areas of focus (Partnerships, Rare, Brief and Unrepeated). Do you agree that these are the right areas of focus / themes to focus the plan around?

[Yes, No, Partly]

	No.	%
Yes	25	45
No	3	5
Partly	18	32
Not answered	8	14

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

Overall, most respondents thought that right themes and areas of focus had been developed for the Action Plan. The following key issues were identified in responses:

Almost all responses acknowledged and supported the emphasis placed within the Action Plan on effective partnership working and that ending homelessness should be a responsibility that extends beyond local authority housing departments.

Ensuring that key partners from other public services contribute towards the aims of the Action Plan was identified as a historic and key challenge to address. A number of responses set the issue of partnership working alongside the pressure being faced by service providers currently supporting unprecedented numbers of people who are experiencing homelessness. Responsibility for securing the necessary commitment was mostly considered to be the responsibility of the Welsh Government, with suggestions that this be achieved, ranging from more active engagement, to legislative changes, to prescribing duties on relevant delivery partners to prevent/end homelessness.

Preventative working was acknowledged by most respondents as critical to the success of the Action Plan. Different descriptions of models of prevention were suggested by some to complement or replace those included in the Action Plan. Some of the suggestions were generic, whilst others sought to give a particular focus on the needs of specific groups or individuals who may be affected by homelessness, for example young people, those experiencing of violence against women domestic abuse and sexual violence (VAWDASV), people leaving state institutions, refugees or asylum seekers.

A number of respondents, in particular submissions from local authorities, did not recognise the 'Rare' theme within the Action Plan as representing preventative

working effectively or sufficiently and considered a separate or more distinctive preventative section should be included. Tangential to these responses were comments made by a number of responses that the four themes within the Action Plan should link more explicitly to the actions to demonstrate their contribution to those aims.

Aspects of the ‘Brief’ theme within the Action Plan, involving rapidly rehousing of people at risk of homelessness caused concern to some respondents, in particular local authorities. Comments highlighted the ambition and challenges in transitioning to the rapid rehousing approach within the proposed timeframe, notably the impact on current types of temporary/supported accommodation, as well as offering permanent housing for people with complex needs. This was set alongside existing pressures being faced to provide services since the start of the pandemic and in developing the supply of suitable homes in the right areas with the right support. Other risks identified the potential that rapid rehousing may lead to individuals making themselves intentionally homeless as a shortcut to finding a home, with potential to conflict with those following conventional routes. Despite some reservations about delivery, there was broad support for rapid rehousing and the clear benefits it can bring, set alongside other options to provide suitable homes and engaging with key partners, for example private rented sector (PRS) landlords.

Few comments were made in connection with the ‘Unrepeated’ theme of the Action Plan, and these mostly related to the challenge of building sufficient volumes of suitable homes to meet the needs people at risk of or experiencing homelessness.

**Question 02:** 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]

	No.	%
Yes	14	25
No	3	5
Partly	30	54
Not answered	7	13

How can they be improved?

The vast majority of responses agreed or partially agreed that the actions reflected the most effective high level steps. The following issues were also noted.

Relatively few common or consistent themes or issues emerged in the responses to suggest any clear consensus. Some responses felt that the order and inter-connection between actions could be improved which repeats a similar point made in responses to question 1. There was recognition within the responses that as a high level action plan, the specificity and detail will be developed as a product of resulting work. Albeit others considered that more detail ought to be provided.

A number of responses highlighted the significance of legislative changes that may affect homelessness policy and practice. Those that commented felt this was a necessary step, with a variety of perspectives on aspects that should be included within any amendments to current law, for example rights based approaches, retention or removal of priority need duties, allocations policy and applicability of duties to specific groups, such as PRS landlords and those experiencing homelessness directly.

The timing of legislation was also identified as being crucial to the implementation of other actions in some responses, with effective planning considered more difficult without knowing what will be the settled legal framework for homelessness services.

The actions relating to rapid rehousing received both support and notes of caution, with a number of local authorities suggesting that this approach should be used flexibly to recognise its limitation for people with different levels of need and concerns were expressed that expectations for rapid rehousing may be overly ambitious. Maintaining alternative forms of housing, not necessarily permanent types, was felt to be necessary, especially before a large enough volume of homes are available.

A number of responses deemed that the perspective of people with lived experiences ought to be drawn out more explicitly. This was linked to other key groups, notably young people, those experiencing VAWDASV, people leaving institutions or those with no recourse to public funds. The recognition in the Action Plan of trauma informed approaches and adverse childhood experiences was considered helpful in addressing the needs of key groups and those experiencing homelessness more generally.

**Question 03:** Does the Action Plan align with other relevant areas of policy and practice? [Yes, No, Partly]

	No.	%
Yes	11	20
No	5	9
Partly	29	52
Not answered	9	16

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

Responses were more succinct for this question, with the majority of comments agreed or partially agreed there was effective alignment with key areas of policy and practice.

Areas for improvement emphasised more explicit references to the Well-being of Future Generations (Wales) Act 2015 and the Social Services and Well-being (Wales) Act 2014, policies for people with protected characteristics, those experiencing VAWDASV and health services. Although some responses suggested

that sufficient consideration had been given to the 2015 Act and policies for young people.

**Question 04:** We have developed a number of key actions and milestones. Do you feel these are the right ones? [Yes, No, Partly]

	No.	%
Yes	14	25
No	2	4
Partly	28	50
Not answered	8	14
Other <sup>1</sup>	2	4

Most of those that answered the question considered that the actions and milestones were right or partially right. Question 4 was designed to encourage binary responses. However, 11 responses provided further narrative. Those that did so expressed concern about the ability of services to deliver against the Action Plan due to existing pressures and the speed of the proposed changes. Some responses highlighted the difficulties caused by the pandemic in general, which they felt could be more clearly articulated. Other areas of improvement focused on the strengthening of references to the roles and responsibilities of partners expected to deliver against the Action Plan. A further issue was noted in respect of the capacity to manage the supply of suitable housing through construction and concern that some PRS landlords were selling their properties in greater numbers.

**Question 05:** Do you think there are any key areas for action not captured by the high level actions? If so, what would they be?

The majority of the respondents thought that the key areas for action were captured in the high level actions. In addition to general comments there were specific references to some actions where respondents felt that they could be strengthened and improved.

A number of respondents referred to the ambitious and challenging timescales and emphasised the need for them to be achievable. Alongside the comments about timescales, existing pressures, and the lack of capacity and resources in the various sectors was highlighted, which could have a negative impact on the deliverability of the key areas for action. It was suggested that further detail could be incorporated into the Action Plan on the specific resources required to deliver the key areas for action.

Several responses, particularly those from local authorities expressed the need for flexibility around funding and also longer term funding from the Welsh Government which would assist with local authority commissioning processes.

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<sup>1</sup> Two responses did not answer this question directly, the first of which highlighted concerns about the actions, but it is unclear whether the actions are considered the right ones or not. The second response indicated that the actions were both the right ones and partly the right ones.



General comments and concerns were expressed in relation to the current housing market, increase in utility costs, and issues around the welfare system such as Universal Credit and Local Housing Allowance rates. Affordability issues, particularly in the PRS was also a common theme in a number of responses and there were suggestions that all these issues together with the wider impacts of poverty could be made more explicit in the key areas for action. To strengthen the PRS's role in homelessness prevention, it was also suggested that guidance and support could be provided to PRS landlords.

A number of respondents suggested that the Welsh Government should set out how it will ensure key partners and stakeholders will fully contribute toward the aims of the Action Plan. Some thought that further clarification or a separate action focusing on partnership working to demonstrate and emphasise its importance and to ensure accountability would be beneficial.

Whilst the focus on single people experiencing homelessness in the Action Plan was welcomed, the need to ensure that the other types of households that are supported by local authorities are also adequately reflected within the action plan was mentioned. In addition to this, ensuring sufficient focus on specific groups such as young people, those experiencing VAWDASV and those who have complex needs was emphasised. With regards to those with the most complex needs there were some concerns about supporting people who are unable to sustain accommodation even with the Housing First model of approach.

The focus on homelessness data was welcomed, but the need to ensure that adequate monitoring arrangements are put in place, in particular for those with protected characteristics was mentioned. There were also comments about the need to consider the housing needs of disabled people, including those with learning disabilities; also raised was those who are pet owners who face challenges in finding suitable accommodation

**Question 06:** We would like to know your views on the effects that the Ending Homelessness Action Plan 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? How could positive effects be increased, or negative effects be mitigated?

The majority of the respondents who answered highlighted that services were either being delivered bilingually, or that the needs of people wishing to communicate in Welsh were recognised. Some responses felt the Action Plan did not go into enough detail about this issue. The need for all materials to be produced bilingually was also raised throughout. Many of those who answered this question felt that producing all materials bilingually would reduce the pressure on households less comfortable communicating in English.

A number of respondents felt that establishing a language preference from the offset and delivering services within that language would build trust with the individual and have a positive impact upon them.

Some respondents raised concern over training opportunities for staff to improve or learn Welsh and that the ability to offer a bilingual service was dependent on all staff possessing some level of Welsh language skills.

Some responses highlighted the connection between the affordability of housing and sustaining communities where Welsh may be spoken more commonly as a first language.

**Question 07:** Please also explain how you believe the proposed plan 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.

Most respondents did not suggest any changes to the Action Plan, but identified challenges currently being faced in respect of recruitment of suitable staff who have the appropriate level of Welsh language learning and ensuring that Welsh should always be available and treated equally with English.

**Question 08:** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Some responses highlighted the importance of partnership working to end homelessness and that this should be a priority for all public services. Although a non-devolved matter, some responses highlighted concerns about the limitations of the welfare system and removal of the £20 uplift to Universal Credit which will affect those at risk or who are experiencing homelessness. A few responses noted that the planning system may restrict the building of new homes, although other respondents highlighted the Programme for Government commitment to build 20,000 new social homes to rent will help manage the transition to rapid rehousing.

Respondents also felt that the Action Plan needed to be more specific and prescriptive when setting objectives. Linked to this was the view that the needs of specific groups, in particular young people and those experiencing VAWDASV were not recognised sufficiently. For the latter, arguments were made about the importance of maintaining emergency provision, such as refuges, which some felt could be undermined given the focus on rapid rehousing. Concerns were raised about the capacity and capability of local authorities to continue to manage the demand for services as proposed by the Action Plan.



## Welsh Government next steps

The Welsh Government is grateful to everyone who has participated in this consultation and in particular those who have submitted a response. As a summary document, not all issues outlined in responses will have been reflected fully, but each response has been considered carefully. It should be noted that the absence of issues or suggestions does not mean they have been disregarded. The high level nature of the Action Plan limits what can be reflected coherently. Therefore, many issues will remain relevant to the wider programme of work aimed at ending homelessness in Wales.

As a consequence of the feedback we have received we have made the following changes to the Action Plan.

- The addition of a Ministerial foreword, which provides the strategic vision and addresses a number of concerns and issues raised in the consultation responses.
- To improve the clarity of the Action Plan and address concerns about the relevance of the four key themes and the actions themselves, the list of actions has been amended to link them directly with the key themes. In particular highlighting the role of prevention in making homelessness a rare occurrence.
- Definitions have been provided to express more clearly the meaning of homelessness and what the ending of homelessness will mean in Wales.
  - Linked to this are changes to the headings 'Rare', 'Brief' and 'Unrepeated' to illustrate what they mean
- Further detail has been added to the opening section of the Action Plan to better reflect the impact of the coronavirus pandemic and how that has and is affecting homelessness services in Wales
- Changes have been made to action 1 – to strengthen the commitment to rapid rehousing and confirm the ongoing commitment and promotion of Housing First
- Changes have been made to action 5 – to reinforce that ongoing support must be provided to strengthen the workforce
- A new action has been developed to recognise the need to involve people with lived experience of homelessness in matters which affect them
- Action 13 has been expanded to reflect how communications can help reduce stigma and improve understanding of the causes and solutions to homelessness
- Further detail has been added to the list of actions to reflect the resources that will be provided to deliver the actions.

The Action Plan is scheduled to be published on 30 November 2021, which will coincide with an Oral Statement given by the Julie James MS, Minister for Climate Change.

## **Annex A – List of respondents to the consultation**

Barnardo's Cymru	North and Mid Wales Association of
Bridgend County Borough Council	Local Councils
Cardiff Council	Pembrokeshire County Council
Cardiff University	Platform
Cardiff Quaker Meeting	Pobl Group Ltd
Carmarthenshire County Council	Powys County Council
Centre for Homelessness Impact	Public Services Ombudsman for
Chartered Institute of Housing	Wales
Clwyd Alyn Housing Limited	Rhondda Cynon Taff County Borough
Community Housing Cymru	Council
Conwy Council	RSPCA Cymru
Crisis	Safeagent
Cymorth Cymru	The Salvation Army
End Youth Homelessness Cymru	Shelter Cymru
Flintshire County Council	Su Burke
Hafan Cymru	Swansea Council
Housing Support Network	Tai Ffres
Information Commissioner's Office	Tai Pawb
Jayne Neal	Torfaen Council
Llamau	Wales Audit Office
Learning Disability Wales	Wales Co-operative Centre
Matthew Savage	The Wallich
National Residential Landlords	Welsh Local Government Association
Associations	Welsh Safer Communities Network
Newport City Homes	Wiser Wireless Wales
Newport County Council	Welsh Women's Aid
	Wrexham Council