

Preventing, tackling and ending homelessness through rapid rehousing and local, regional and national partnerships

Report to Welsh Ministers from the Homelessness Action Group

July 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

About the Homelessness Action Group

The Welsh Government set up the Homelessness Action Group (the Action Group) in June 2019 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?*

The Action Group's reports

This report is the final of three reports by the Action Group. It is published alongside *Hwyl Fawr to Homelessness: how to end homelessness in Wales, by people with first-hand experience* (July 2020), a report on the Action Group's consultation with people who have lived experience of homelessness.¹

The Action Group's two previous reports are:

- *Preventing rough sleeping in Wales and reducing it in the short-term* (October 2019), which recommended winter actions for 2019-20 and longer-term solutions to prevent rough sleeping.²
- *The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)*, setting out the framework of policies, approaches and plans needed to end homelessness in Wales (March 2020).³ This is the Action Group's main report, which also reported on the group's consultation with people working in housing and homelessness roles, and some headline details from the consultation with people with lived experience of homelessness.

¹ Shelter Cymru (2020) *Hwyl Fawr to Homelessness: how to end homelessness in Wales, by people with first-hand experience*: <https://sheltercymru.org.uk/wp-content/uploads/2020/07/Hwyl-Fawr-to-Homelessness.pdf>

² Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short term*. Available at: <https://gov.wales/homelessness-action-group-report-october-2019>

³ Homelessness Action Group (2020) *The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)*. Available at: https://gov.wales/sites/default/files/publications/2020-03/homelessness-action-group-report-march-2020_0.pdf

This report provides more detail on scaling-up rapid rehousing approaches (question 3) in Wales and on joined-up partnerships and plans (question 4), and it also considers the impact of the coronavirus outbreak and the response. These recommendations are offered within the framework already set out in the Action Group's main report on ending homelessness.

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1.0 Introduction

1.1 The coronavirus and a plan to end homelessness

The Welsh Government established the Homelessness Action Group in June 2019 to recommend how across Wales we can ensure every person has their basic need for a home and support met. The Welsh Government wants to make homelessness rare by preventing it and, when people do lose their homes, for any experience of homelessness to be brief and non-repeated. We are pleased that the Minister for Housing and Local Government accepted in principle all the recommendations for ending homelessness in the main ending homelessness report,⁴ and agreed to come up with a plan to achieve this in due course.⁵

The Action Group has written this report both to answer in more detail the final two questions the Minister asked about rapid rehousing and local partnerships to end homelessness (questions 3 and 4); and to reflect on the coronavirus outbreak and its effect on ending homelessness.

The outbreak has affected everyone but people facing homelessness are among the most exposed in our society. The Action Group welcomes the swift and decisive action by the Welsh Government, councils and public service partners to re-accommodate and help more than 800 people into emergency accommodation. The Welsh Government provided funding, clarity on outcomes to be achieved, and useful guidance that supported an extraordinary effort to re-accommodate people. The guidance also clearly set an expectation that councils and their partners re-accommodate people with 'no recourse to public funds' status.

The announcement of a 'phase two', to help people in emergency accommodation move into safe and secure homes with the support people need to do this, is also welcome. If successful it will ensure people are not forced back onto the street or into unsafe temporary accommodation as the coronavirus lockdown eases. As the Action Group's main report recommended in March, we must also increase efforts to prevent homelessness in the first place, and this should be a priority for any plan to end homelessness.

The focus of the ending homelessness framework in the main report was:

- Maximum homelessness prevention by taking universal action to: tackle the root causes of homelessness, such as poverty; reduce and end youth homelessness; and take more targeted, earlier action across all public services along with an effective crisis response for people at more immediate risk.
- Rapid rehousing as the default approach to quickly help people experiencing homelessness to be rehoused with all the support they need, and with all the practical steps needed to bring about a rapid rehousing approach.
- Investing in people who help end homelessness by funding and supporting workforces, involving people with lived experience of homelessness and

⁴ Homelessness Action Group (2020) *The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)*

⁵ Welsh Government (2020) 'Written statement - COVID-19 Response – Homelessness and Rough Sleepers', 20 March 2020. Available at: <https://gov.wales/written-statement-covid-19-response-homelessness-and-rough-sleepers>

people in front-facing support services, and enabling charities and volunteers to play a part in the preventative approach and in rapid rehousing.

We are encouraged by the progress made during the coronavirus outbreak and the way that people, services and organisations have worked together. We also must recognise, however, that we have not yet ended homelessness for many people. As attention turns to how and when the lockdown in Wales will ease, we now have to make sure all people who were re-accommodated are helped into safe and secure homes. Beyond this, we must ensure our system can prevent homelessness more effectively and quickly respond when people do lose their homes. The Action Group's report on ending homelessness provides a framework for the policies, approaches and plans needed to do this.

1.2 Next steps after the Action Group finishes

Due to the shorter-term actions already taken during the outbreak, the Action Group focuses in this report on the medium term (the next 6-12 months); and the longer-term beyond summer 2021. The shorter-term actions by the Welsh Government, local authorities and partners progressed at a very swift pace the implementation of the Action Group's recommended framework for ending homelessness.⁶ There will also be elections and a new Senedd term from May 2021, during which there needs to be a focus across the main political parties on the actions needed to end homelessness. The Action Group will end when this report is published but all members remain keen to contribute to future efforts to end homelessness.

The Action Group is also pleased to publish the final report of the consultation with people with lived experience of homelessness, led by Shelter Cymru and with help from Cymorth and others members of the Action Group.⁷ As an Action Group we would like to thank and acknowledge all the input and help we've had to complete our work. Action Group members' colleagues helped host meetings across Wales and supported the work of the group; people with lived experience of homelessness and members of housing and homelessness workforces contributed to our surveys and engagement events that helped us understand the challenges and solutions; and the Minister and her officials were open to hearing the Action Group's recommendations and advice. As a group we are especially grateful to Nick Morris, Policy and Communications Manager at Crisis, for his support and advice through every stage of our work.

The coronavirus outbreak has changed many things and it is unclear as yet how and when Wales will return to a sense of normality. We are clear as an Action Group that we do not want to return to the situation we were in during early 2020, where hundreds of people were sleeping on the street and in inadequate temporary accommodation. Instead we must put in place the policies and approaches that will deliver a future where everyone has a home and homelessness is ended. That goal

⁶ Homelessness Action Group (2020) *The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)*

⁷ Shelter Cymru (2020) *Hwyl Fawr to Homelessness: how to end homelessness in Wales, by people with first-hand experience*: <https://sheltercymru.org.uk/wp-content/uploads/2020/07/Hwyl-Fawr-to-Homelessness.pdf>

is as clear now as it was before the outbreak. It is the responsibility of each and every one of us to do our bit, with the Welsh Government leading from the front.

2.0 Partnerships to end homelessness (Action Group's Question 4)

2.1 Ending homelessness report and coronavirus context

The main Action Group report on ending homelessness, published in March 2020, highlighted the importance of partnerships, particularly between workforces and services, people with lived experience of homelessness, and charities and volunteers. Recommendations in the ending homelessness report set out how we need:

- A shared sense of ownership for ending homelessness and making sure everyone has a home.
- An agreed outcomes framework and reporting via Welsh Budget processes to the Senedd
- Mutual accountability and support between public services.
- More support and recognition for workforces, including funding and supporting psychologically informed approaches across public services; and enabling volunteers and communities to play a role.
- A focus on dignity and respect for people experiencing homelessness and national structures for stakeholders, including people with lived experience, to feed into the planning, delivery and evaluation of all work.⁸

In the Welsh Government's first phase of the coronavirus outbreak response, from the initial lockdown in March 2020 to the end of June, effective partnership work by a range of services and volunteers worked to re-accommodate more than 800 people across Wales into emergency accommodation, thereby reducing their exposure to the virus.⁹ While only a short-term measure this joint work presented the chance to ensure that people experiencing some of the most acute forms of homelessness were helped with more permanent solutions rather than being forced to sleep rough or stay in inadequate temporary accommodation again after the outbreak. The Welsh Government's phase one work also overlaps with phase two, which involves the work to re-accommodate people from the street and inadequate temporary accommodation into more permanent homes.

The Welsh Government asked local authorities and their partners to undertake a series of changes as part of phase two from July 2020 to March 2021. The new phase is supported by £20m revenue and capital funding to help bring forward funding from wider public services. They include measures to support local volunteers and community assets; and to continue coordination cells¹⁰ into phase

⁸ Homelessness Action Group (2020) *The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)*

⁹ Welsh Government (2020) *Phase Two – Planning Guidance for Homelessness and Housing Related Services*, p.5. Available at: <https://gov.wales/sites/default/files/publications/2020-06/planning-guidance-for-homelessness-and-housing-support-services-coronavirus.pdf>

¹⁰ Welsh Government (2020) 'Coronavirus (COVID-19): local authority support for rough sleepers': In phase one, to re-accommodate people sleeping rough and people in inadequate temporary accommodation, the Welsh Government guidance said each area should have a "centralised coordination cell led by local authority to ensure efficient deployment of resources of all partners". Available at: <https://gov.wales/coronavirus-covid-19-local-authority-support-for-rough-sleepers-html>

two and regional collaboration (e.g. to source extra accommodation) and between housing, homelessness and partner services (e.g. mental health, substance use, and services to support people experiencing violence against women, sexual violence or domestic abuse). The cells also have contact with the Welsh Government.¹¹ The Action Group's recommendations in this report aim to build on this progress. As a result, they focus on the period in the next 6-12 months (into the Welsh Government's phase two) and beyond.

2.2 National, regional and local structures to end homelessness

2.2.1 Existing structures

There are currently a number of structures that fulfil different strategic objectives across Wales linked to housing and homelessness. For example, across Wales and in regions and local areas there are:

- 19 Public Service Boards (PSB) corresponding with local authority boundaries, established by the Future Generations Act. (Some are combined across local authority areas, e.g. four PSBs across north Wales' 6 councils).
- 7 Area Planning Boards in Local Health Boards for substance use services.
- Regional Partnership Boards, primarily to bring together health and social care (and more recently housing and education). These include local authority and Registered Social Landlord housing representatives as a minimum. They also access various funding streams, e.g. Integrated Care Fund (revenue and capital), winter pressures funding, and transformation programme funding.
- 6 Regional Collaborative Groups, specified in the Housing Support Grant guidance, and with a Regional Development Coordinator role to facilitate the group.
- National forums, such as the local authority homelessness/support networks, the Cymorth/Community Housing Cymru Housing Support Network, ministerial stakeholder forums, and the Housing Support Ministerial Advisory Board.

The Action Group noted the importance of a national forum to take ownership of the outcomes framework for ending homelessness, and to cooperate with local and regional partnerships. Based on discussions with representatives of the various forums, and through our consultation work, the Action Group agreed that Wales need a national structure that:

- Ensures leaders of the key agencies are 'round the table' and prioritising the delivery of regional or local plans for ending homelessness;
- Ensures those leaders are well-informed by practitioners and those delivering the relevant services, by people with lived experience of homelessness, and by the best available data.

¹¹ Welsh Government (2020), *Phase Two*, p.17

- Gives local/regional discretion on how best to deliver the framework for ending homelessness.
- Ensures mutual accountability and support among partners, and works closely with the Welsh Government to advise on its approach.

2.2.2 Adapting existing structures

The Action Group is not convinced that an existing structure is in a position to fully carry out the ending homelessness role as currently constituted. However, the Action Group is keen to ensure that structural reform is minimised and made as quickly and efficiently as possible, rather than delivering a new set of structures.

On balance, the Action Group favours giving the Housing Support Ministerial Advisory Board a clearer remit in relation to monitoring the delivery of the Homelessness Action Group's recommendations, the support needed to do this, and clear responsibilities for reporting to Ministers on progress towards ending homelessness, consideration of the latest international evidence, as well as representing the public services and stakeholders nationally and from local areas and regions.

The Action Group also favours building on existing regional and local partnerships and giving them the resources and support needed to deliver the national outcomes framework for ending homelessness that the Action Group previously recommended. The Action Group believes Regional Partnership Boards are best placed to provide the multi-agency strategic focus on housing and homelessness, although there is variation in the extent to which this currently happens. However, with a refreshed mandate, a review of memberships, and some coordination support these boards would be able to carry out this role. The Action Group believes this way of working will ensure the cross-public services response needed to end homelessness, including key partners such as health services. This model could also link with the Regional Collaborative Groups for housing support.

At a more local level, the coordination cells that operated in the first two phases of the coronavirus outbreak would be the most suitable multi-agency forum to deliver the outcomes framework in local areas. While there has been some variation in their operation, they have strong potential to take on a more strategic role also as they have been doing with the phase two response. The longer-term, strategic transition requirements the Welsh Government has set for phase two contain many of the rapid rehousing outcomes that the full national outcomes framework should contain.

Recommendation 1: As recommended in the Action Group's main report, the Welsh Government and its partners should agree an outcomes framework for ending homeless and report on progress against the framework in its annual action plan, including how to achieve greater homelessness prevention (universal, targeted and crisis prevention); and how phase two measures in the coronavirus response will translate into outcomes for broader rapid rehousing transition beyond 2021. The framework should also set out the agreed ownership of tasks for planning, delivery and evaluation and cover outcome setting, funding, and national policy and legal frameworks.

Recommendation 2a: The Welsh Government should adapt the Housing Support Ministerial Advisory Board to create a national forum to include stakeholders from policy and service delivery in housing and other public services, and people with lived experience of homelessness, to help with the planning, delivery and evaluation of the outcomes framework and action plan to end homelessness.

The remit of the forum in relation to ending homelessness should be:

- **To assist in the delivery of the Welsh Government plan to end homelessness and ensure the accepted recommendations of the Action Group are translated into action.**
- **Provide a national, independent sounding board for planning, delivery and evaluation; to advise ministers; and to consider evidence.**
- **To provide strategic input and commitment from the range of public services needed to end homelessness**
- **To bring expertise and insights to the work to end homelessness, including from people with lived experience of homelessness and people working in front-facing housing and support roles, and to support regional and local structures to also do this.**
- **To consult, influence and inform stakeholders not present at meetings and develop ways to include a representative input from a wider group of stakeholders.**
- **Provide mutual accountability and support for partners, including national and local government.**

Recommendation 2b: The Welsh Government should work with partners to revise the mandate, review membership, and give extra support to Regional Partnership Boards to deliver a regional, multi-agency approach to housing and homelessness and the national ending homelessness outcomes framework.

Recommendation 2c: The Welsh Government should work with local coordination cells to ensure they have the support, membership and mandate to deliver against the outcomes framework for ending homelessness in their areas with the support and cooperation of, and accountability with, relevant regional and national structures.

2.3 Communication and volunteer mobilisation

Previous Action Group recommendations set out the importance of well-framed communication with a number of different audiences so that people can work

together to end homelessness.¹² We noted in particular the efforts of volunteers and communities across Wales who have differing levels of support and contact from statutory and charity services. Volunteers undertake a range of activities, many of which are very helpful to ending homelessness, but some of which are not as helpful.

While the circumstances and needs of different audiences differ, the Welsh Government and partners should work to engage all stakeholders. It is promising that the Welsh Government's *Phase Two* planning document includes references to effective communication with volunteers and community groups as part of the work to develop local plans by coordination cells, led by local authorities.¹³ There needs to be local and regional flexibility in how these relationships are developed, but ideally the Welsh Government and partners should provide toolkits for local areas to develop communication strategies and tactics. There is potential for the Welsh Council for Voluntary Action and County Voluntary Councils to play a strategic role in local coordination cells, where this is not already the case.

The overall outcome should be for areas to make the most of volunteers' and communities' trust with people experiencing homelessness, local knowledge, and energy. There should be offers of training and support for volunteers to manage statutory responsibilities, such as safeguarding. Some of the volunteer groups' actions have, despite being well intentioned, not helped to meet longer-term goals to end homelessness. The aim instead should be a sense of all parties playing to their strengths towards a common goal.

Recommendation 3: The Welsh Government should work with partners to provide communication support, working with professional communicators across the housing and homelessness sectors and in local and national government, to help local coordination cells work effectively with volunteers and community assets. The support should also help local partners to challenge unhelpful communication about homelessness and promote good practice in public and media discussion about the causes of homelessness and its solutions.

¹² Homelessness Action Group (2020) *The framework of policies, approaches and plans needed to end homelessness in Wales (What ending homelessness in Wales looks like)*, Recommendation 12

¹³ Welsh Government (2020) *Phase two*, p.17

3.0 Rapid rehousing (making homelessness brief and non-repeated)

3.1 Rapid rehousing defined

The Welsh Government accepted in principle the Action Group's recommendation to deliver a 'right to adequate housing'.¹⁴ As part of this, the Action Group recommended a rapid rehousing approach to make sure homelessness is brief and non-repeated:

“Rapid rehousing is about taking a housing-led approach for rehousing people that have experienced homelessness, making sure they reach a settled housing option as quickly as possible rather than staying in temporary accommodation for too long.”¹⁵

The Action Group's ending homelessness report set out that rapid rehousing should be the default approach for people experiencing homelessness, where prevention has not worked. Rapid rehousing primarily means ending homelessness through making sure a person has a home and support rather than meaning a set of processes, specific service models, or just relative improvements in a person's accommodation situation.

While we recognise the considerable success so far in supporting people into temporary accommodation during the coronavirus outbreak, we have to be clear that this has not ended homelessness for people. However, we can build on this culture of doing 'whatever it takes' by continuing to work with people who have been re-accommodated until their homelessness has ended.

In all our consultations with people with lived experience of homelessness, people focused on the need to move people to permanent home as soon as possible with any support needed, reducing times in temporary accommodation, and making sure the supply of good quality homes is available.¹⁶ The need for support from a range of services was also a key theme with respondents saying:

- “You can't throw someone who's never been in a decent home into a home and expect them to be okay.”
- “I don't think there should be a time limit as people's needs are different.”
- “I have a chronic health condition; I was discharged back onto the streets from the hospital. I was discharged so late on a Friday I missed my appointment with Housing Options so was back on the streets. It's common; it happens all the time.”

¹⁴ Action Group (2020) Recommendation 7 on delivering the right to adequate housing in practice

¹⁵ Social Bite (2018) Rapid Rehousing Transition Plans: Guidance for Local Authorities and Partners. Accessed 21 January 2020 on https://social-bite.co.uk/wp-content/uploads/2018/07/Rapid_Rehousing_Guidance1.1.pdf

¹⁶ Shelter Cymru (2020) *Hwyl Fawr to Homelessness: how to end homelessness in Wales, by people with first-hand experience*: <https://sheltercymru.org.uk/wp-content/uploads/2020/07/Hwyl-Fawr-to-Homelessness.pdf>

3.2 Phase two of the coronavirus response

In the shorter term (immediately and in the next 6-12 months) we welcome that the Welsh Government's phase two plan for homelessness and housing support recognises the importance of rapid rehousing transition. For people experiencing homelessness the outbreak is another source of pressure in addition to the existing harms and risks that people face when without a home. The Action Group supports the measures and principles in the *Phase Two* guidance and the requirements for the transitional plans that local authorities and their partners should be:¹⁷

- Using a move-on protocol “with rapid rehousing at its heart” for more than 800 people who have been re-accommodated across Wales, including local areas assessing the current and needed provision for accommodation and support, with consideration of the scale of the broad cohorts of people who might benefit from the different support available (e.g. estimating broad numbers of people who are expected to need longer or shorter durations of support; or lesser or greater degrees of support intensity).
- Reducing dependency on temporary accommodation and improving the quality of temporary accommodation that is still needed as part of the rapid rehousing system in each area.
- Offering a range of support models under the rapid rehousing banner, flexed by intensity and duration of the support people need.
- Increasing the availability of social housing and private rented sector housing for people experiencing or at risk of homelessness.
- Bringing empty properties back into use.
- Supporting young people at risk of or experiencing homelessness.
- Using multi-agency approaches at both strategic and delivery levels.
- Using psychologically informed and trauma informed approaches across services.
- Offering a mix of remote and face-to-face support.
- Mobilising volunteers and community assets.
- Following a collaborative approach.
- Finding solutions for people with ‘no recourse to public funds’ status.

3.3 Rapid rehousing beyond phase two

While local areas will make progress towards rapid rehousing as the default approach for most people experiencing homelessness, the transition will not be complete by the end of the Welsh Government's phase two period (March 2021). There is not yet clarity of funding beyond the £20m fund and the Senedd elections are due in May 2021.

The Action Group urges all main political parties to adopt long term commitments to deliver the ending homelessness framework previously recommended by the Action Group, and as part of this to commit to the capital and revenue funding, giving political leadership, allocating legislative time, and investing in the policy and practice

¹⁷ Welsh Government (2020) *Phase Two*, p.5

development needed. The Action Group welcomes that the Welsh Government has already accepted in principle the recommendation to have a transition period (with five years as a guide timescale). This is based on experiences in Scotland with rapid rehousing transition plans.¹⁸ All areas should use the phase two work, and existing work and insight, as a base to develop rapid rehousing plans.

Recommendation 4: The Welsh Government should continue to support longer term transition planning beyond the initial 9-month phase two period, working with local authorities to help phase out tests for local connection, intentionality and priority need; to deliver the five-year vision for temporary and permanent accommodation supply, including definitions of suitability and guidelines on rapidity; to continue to fund transition to rapid rehousing and prevention work; and ensure each local area has an action plan to achieve the rapid rehousing outcomes for everyone, with all partners taking ownership and supporting each other.

While there was great success in re-accommodating people into emergency accommodation during the pandemic, a small number of people across Wales continued to sleep rough and there will still need to be assertive outreach services to help end homelessness for people in this situation.

The Welsh Government and partners rightly acknowledge people experiencing homelessness are a diverse group and tailored responses are needed for particular cohorts of people with differing needs, such as co-morbid substance use and mental health issues, learning disabilities, or brain injuries. Local approaches, plans and strategies should factor this in, and ensure all parts of a person's housing and support needs are addressed (including reducing loneliness and isolation, helping bring a sense of purpose, and recovery from time sleeping on the streets). For people still on the streets who feel alienated from the current offer there needs to be particularly tailored solutions, delivered through assertive outreach and specialist services. The Action Group recommended this in the report on tackling and ending rough sleeping.¹⁹

3.4 UK policy changes needed for rapid rehousing

In light of temporary changes the UK Government and Welsh Government made during the outbreak, the Action Group reiterates the UK policy changes needed to end homelessness. The Welsh Government's early clarity in guidance for local councils to help people with no recourse to public funds during the public health emergency were very welcome, and the UK Government must change legislation and guidance to remove these restrictions permanently.

Working closely with the other devolved governments, the Welsh Government should make the case for changes to welfare policy, so that the benefits system

¹⁸ Homelessness Action Group (2020) *What ending homelessness looks like*, Recommendation 18

¹⁹ Homelessness Action Group (2019) *Preventing rough sleeping in Wales and reducing it in the short-term*, Recommendation 1

helps relieve the pressure on households and that welfare covers the cost of housing.

As the UK continues to finalise the details of full EU exit, the Welsh Government should also ensure EEA nationals are supported to apply for the EU Settlement Scheme in the UK.

Recommendation 5a: As previously recommended by the Action Group the Welsh Government should lobby the UK Government to permanently lift restrictions for support for people with no recourse to public funds so that people can be helped after the public health emergency.

Recommendation 5b: With the UK set to fully leave the European Union at the end of the transition period, the Welsh Government should also ensure EEA nationals are supported to apply for the EU Settlement Scheme in the UK.²⁰

Recommendation 5c: The Welsh Government should prioritise Local Housing Allowance and the effect of the benefit cap on households in discussions with Ministers and Cabinet Secretaries from devolved administrations and the UK Government. The desired outcome is to ensure the private rented sector is a viable option for people at risk of homelessness or experiencing it.

3.5 Meeting the need for accommodation and increasing the supply of and access to good quality homes

Increasing the supply of homes came up repeatedly as a priority for ending homelessness in the Action Group's work and consultations. The Action Group's previous recommendations also emphasised the importance of support, including addressing barriers to people accessing homes. The coronavirus has also challenged traditional ways of working, such as face-to-face support, in-person house viewings, and the document and contract processing, and services have had to freeze activity or adapt quickly.

The Welsh Government's phase two document for the coronavirus response highlights the importance of building and acquiring new homes, and repurposing and adapting existing buildings to enable rapid rehousing transition. The Action Group welcomes the clear message from the Welsh Government that floor space, provision of tents and sleeping bags, and 'pods'/portacabins are not suitable modular accommodation.²¹ As the Action Group recommended, the overall goal should be to realise the right to adequate housing for all people and to support rapid rehousing outcomes through the provision of homes and support.

The scale of housing need is so great that increasing housing supply should be a priority beyond the next Senedd term too. It is welcome that the Welsh Government

²⁰ Homelessness Action Group (2020) *What ending homelessness in Wales looks like*, Recommendation 19

²¹ Welsh Government (2020), *Phase Two*, p.10

has adopted a definition of housing need on which to base more accurate supply estimates across different tenures.²² For people experiencing homelessness or on low incomes the Action Group recognises the critical importance of delivering more social homes across Wales as part of meeting housing need.²³ This needs to be a cross-party commitment for the long term.

In the next 6-12 months and beyond, Wales and the rest of the UK will experience the economic impact of the coronavirus pandemic and will need to meet the scale of this challenge. Investment in housing can help contribute to the economic and social recovery²⁴ and estimates commissioned by Community Housing Cymru found that every £50m investment in social housing supports more than 600 new homes, £100m economic activity, and more than 200 new jobs.²⁵

Successful rapid rehousing transition will ensure the use of temporary and emergency accommodation is reduced, although it should still play a minor role in the overall response to homelessness. The Action Group agreed it is important to recognise that many providers of temporary and emergency accommodation do very valuable work in reducing harm and providing people with improved accommodation options. However, the international evidence is clear that this service model does little or nothing to prevent future homelessness.²⁶

The Action Group's conclusions on emergency and temporary accommodation are that:

- Temporary accommodation should be a tenure type and not be seen as a building type, so that stays in temporary accommodation can be part of the longer-term solution overall and temporary accommodation provides safe, dignified and good quality accommodation.
- Interim temporary accommodation provision of good quality will be needed as part of rapid rehousing transition. However, it must be guided by the five-year vision in local areas and in general there should over time be commissioning of more permanent housing and support solutions, and decommissioning of temporary solutions. In Scotland, for example, rapid rehousing transition plans in the Scottish Highlands, Aberdeenshire, Fife and Midlothian all feature self-contained, good quality temporary accommodation, with the potential to convert it into longer-term tenancies (known as 'flipping', which can happen along with replacing stock for each flipped tenancy).²⁷

²² Welsh Government (2019) *Estimates of housing need (by tenure): 2018-based*.

<https://gov.wales/estimates-housing-need-tenure-2018-based>

²³ Bramley, G. (2018) *Housing supply requirements across Great Britain: for low-income households and homeless people*. London: Crisis and National Housing Federation

²⁴ Homes for All Cymru and Shelter Cymru (2020) *Putting good homes at the core of the post-Covid recovery plan*. Available at: <https://sheltercymru.org.uk/wp-content/uploads/2020/06/XPHG-covid-discussion-paper.pdf>

²⁵ CHC (2020) *Research into the economic impact of the provision of affordable housing in Wales*. Available at: <https://chcymru.org.uk/uploads/general/CHC-Economic-Impact-of-Affordable-Homes-ENG.pdf>

²⁶ Homelessness Action Group (2020) *What ending homelessness in Wales looks like*, p.43

²⁷ Dunn, L. (2020) *Rapid rehousing transition plans: a Scottish overview* (Crisis). Available at: https://www.crisis.org.uk/media/241640/crisis_rapid-rehousing-report_web_spreads_v2.pdf

- As set out in the Action Group's rough sleeping report, there is some potential, until phase one of the coronavirus response concludes, to work with potential new partners identified in the rough sleeping report (e.g. universities, hotels and holiday accommodation) to provide interim dispersed accommodation for people with low or no support needs.
- As well as the role the private rented sector already plays there is potential for the Welsh Government to work more closely with the National Residential Landlords Association and Rent Smart Wales to register vacant properties to help increase emergency accommodation – and this could turn into more permanent accommodation in the future.

Recommendations in the Action Group's report on ending homelessness cover the range of measures needed to ensure supply, access for people with experience of homelessness or at risk of it, and support needed to sustain homes and tenancies.²⁸ At this critical moment in the transition to rapid rehousing approaches in Wales, however, the Action Group would like to ensure a focus on good quality housing as the standard for all tenure types, including temporary accommodation.

Recommendation 6: As part of delivering a 'right to adequate housing in practice' as recommended by the Action Group, the Welsh Government must ensure best practice is delivered in construction and that all methods of construction deliver good quality homes for all tenures, including any temporary accommodation that is needed. Housing in all tenures and communities should enable the effective support for people to stay in their homes.

²⁸ Homelessness Action Group, *What ending homelessness in Wales looks like*. Recommendations 6-7

4.0 Improving access to prevention (making homelessness rare) during the coronavirus outbreak

While this report focuses on answering the remaining questions the Minister asked, the Action Group wanted to revisit homelessness prevention in the context of the coronavirus outbreak. While the overall themes in this section are not new and are very compatible with the Action Group's previous recommendations on ending homelessness, this section reflects the emerging trends and challenges in homelessness brought about by the coronavirus.

In the Action Group's main report, prevention recommendations formed the bulk of recommendations (14 out of 19). They set out how prevention should be a core part of ending homelessness:

- Universal prevention across society to address the root causes of homelessness, such as poverty and unaddressed trauma.
- Targeted prevention to support people more at risk of homelessness and provide a 'no wrong door' approach in public services to support people.
- Crisis prevention services in councils as the 'last line of defence', with a small amount of acute provision for people needing emergency help for a matter of days.

The Action Group noted that our consultation in late 2019 with people with lived experience of homelessness found that 9 out of every 10 people who experienced homelessness still worried about their housing situation even when housed.²⁹ This underlines the need to still prioritise homelessness prevention while also seeking to rapidly rehouse people already experiencing homelessness. In the medium term, the Action Group recommends communication campaigns continue to help people understand what homelessness and housing instability is, and how to seek support if they or someone they know is at risk of losing their home or is already homeless.

Respondents to the Action Group's consultations with people with lived experience of homelessness emphasised the need to make sure prevention services work:³⁰

- "People fall on hard times and do not intend or want to be homeless. Some need support to be able to maintain a tenancy or even understand their rights as a tenant."
- "It's obvious someone is struggling if they can't pay their rent. It's pointless evicting them, what is that solving? It just creates another person using homeless services."

²⁹ Homelessness Action Group (2020) *What ending homelessness in Wales looks like*, p.5

³⁰ Shelter Cymru (2020) *Hwyl Fawr to Homelessness: how to end homelessness in Wales, by people with first-hand experience*: <https://sheltercymru.org.uk/wp-content/uploads/2020/07/Hwyl-Fawr-to-Homelessness.pdf>

- “Between all the organisations there is enough support and housing for everybody.”

4.1 Helping people to access prevention support

Recent evidence from services shows there is strong risk that more people could lose their homes, if they are not helped with homelessness prevention support. A survey in late May 2020 by Citizens Advice Cymru found more than a third (34%) of renters had fallen behind or expected to fall behind on rent payments.³¹ The Tenant Participation Advisory Service (TPAS) Cymru found more than two-thirds (67%) of private renters surveyed did not know what to do if they were unable to pay rent, and 1 in 4 in social rented accommodation (25%) also did not know.³²

Recommendation 7: The Welsh Government and charity partners should continue to carry out communication campaigns that help people identify as being at risk of homelessness or experiencing it, and for friends, family and colleagues to recognise the potential signs of homelessness risks in others and know how to refer people for support.

4.2 Ending evictions into homelessness³³

The freeze on eviction action across England and Wales, and modest extension of notice periods for eviction, was also a valuable intervention during the outbreak. Action at UK level to temporarily extend Local Housing Allowances to the 30th percentile of rents was also helpful to some extent. Social landlords (both stock-holding local authorities and housing associations) also made commitments to provide additional support with a focus on prevention through financial assistance.³⁴

The Action Group remains concerned about people facing eviction as a result of the outbreak and welcomes the freeze on eviction action that was renewed in early June 2020.³⁵ Looking further ahead, to 6-12 months and beyond, the Action Group put forward universal, targeted and crisis prevention recommendations to reduce and end evictions into homelessness. There are, however, some specific measures that

³¹ Citizens Advice (2020) *Facing the cliff edge – Protecting people in Wales from the financial consequences of Covid-19*, p.9. Available at: <https://www.citizensadvice.org.uk/Global/CitizensAdvice/Wales/Facing%20the%20cliff%20edge.pdf>

³² TPAS Cymru (2020) *Tenant voice on Covid-19 – cracks starting to appear*, p.13. Available at: <https://www.tpas.cymru/ckfinder/userfiles/files/Pulse%20%20Covid-19%20Eng.pdf>

³³ Homelessness Action Group (2020) *What ending homelessness in Wales looks like*, Recommendation 7

³⁴ CHC (2020) ‘Supporting tenants through the crisis’: <https://chcymru.org.uk/en/coronavirus-resources-for-housing-associations/supporting-tenants-through-the-crisis/>

³⁵ Gov.UK (2020), ‘Press release - Ban on evictions extended by 2 months to further protect renters. 5 June 2020.’ Available at: <https://www.gov.uk/government/news/ban-on-evictions-extended-by-2-months-to-further-protect-renters>

could help to do this, including the powers for Welsh Ministers in the Coronavirus Act 2020.³⁶

Recommendation 8a: Welsh Government should undertake urgent discussions with landlords and support agencies to ensure that suitable temporary measures to increase security of tenure for tenants are in place until the Renting Homes (Wales) Act 2016 and the amendments to it come into force in 2021. This should include mandatory pre-action protocols for the private rented sector and work with social landlords to implement the financial assistance protocol and commitments to end evictions into homelessness.

Recommendation 8b: The Welsh Government and local authorities and their partners should continue to work with social and private landlords to reduce and end evictions into homelessness, provide tenancy support, and ensure there are tenancy relations services in place.

³⁶ Coronavirus Act 2020, Schedule 29, 13(1)

Annex: Ending homelessness recommendations

Partnerships to end homelessness		
1	<p>The Welsh Government should agree an ‘ending homelessness outcomes framework’ to help co-operation between all Welsh public services, housing providers, and support providers. The framework should aim to increase homelessness prevention and adopt best practice in supporting people experiencing homelessness to access and maintain the right housing for them. The starting assumption should be to use existing strategic planning structures to deliver this at local, regional and national level but a new structure or structures might be needed (<i>Ending homelessness report, Recommendation 1</i>)</p> <p>As recommended in the Action Group’s main report, the Welsh Government and its partners should agree an outcomes framework for ending homeless and report on progress against the framework in its annual action plan, including how to achieve greater homelessness prevention (universal, targeted and crisis prevention); and how phase two measures in the coronavirus response will translate into outcomes for broader rapid rehousing transition beyond 2021. The framework should also set out the agreed ownership of tasks for planning, delivery and evaluation and cover outcome setting, funding, and national policy and legal frameworks (<i>This report, Recommendation 1</i>)</p> <p>The Welsh Government should adapt the Housing Support Ministerial Advisory Board to create a national forum to include stakeholders from policy and service delivery in housing and other public services, and people with lived experience of homelessness, to help with the planning, delivery and evaluation of the outcomes framework and action plan to end homelessness.</p> <p>The remit of the forum in relation to ending homelessness should be:</p> <ul style="list-style-type: none"> • To assist in the delivery of the Welsh Government plan to end homelessness and ensure the accepted recommendations of the Action Group are translated into action. • Provide a national, independent sounding board for planning, delivery and evaluation; to advise ministers; and to consider evidence. • To provide strategic input and commitment from the range of public services needed to end homelessness • To bring expertise and insights to the work to end homelessness, including from people with lived experience of homelessness and people working in front-facing housing and support roles, and to support regional and local structures to also do this. • To consult, influence and inform stakeholders not present at meetings and develop ways to include a representative input from a wider group of stakeholders. • Provide mutual accountability and support for partners, including national and local government. <p>(<i>This report, Recommendation 2a</i>)</p>	<p>Outcomes framework; and partnership structures, remits and memberships</p>

	<p>The Welsh Government should work with partners to revise the mandate, review membership, and give extra support to Regional Partnership Boards to deliver a regional, multi-agency approach to housing and homelessness and the national ending homelessness outcomes framework. (<i>This report, Recommendation 2b</i>)</p> <p>The Welsh Government should work with local coordination cells to ensure they have the support, membership and mandate to deliver against the outcomes framework for ending homelessness in their areas, with the support and cooperation of, and accountability with, relevant regional and national structures. (<i>This report, Recommendation 2c</i>)</p> <p>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 (<i>Rough sleeping report, Recommendation 12</i>).</p>	
2	<p>In the course of Budget scrutiny Welsh Government departments should report to the National Assembly for Wales on current and planned spending in their budgets in all five areas of homelessness prevention outlined in the ending homelessness framework (as outlined in this report) and in line with the Welsh Government's generic prevention framework (<i>Ending homelessness report, Recommendation 2</i>)</p>	Updating the Senedd/Welsh Parliament
3	<p>The Welsh Government, local authorities and their service delivery partners should agree a plan to ensure the workforce is effectively supported to implement this framework. This includes:</p> <ul style="list-style-type: none"> • Ensuring a psychologically-informed approach is taken across all public services in Wales. • Further recognition and development of the skills, values and experiences of staff working to end homelessness, including consideration of a more formal approach to work-based learning and development especially in public services. • Regular time for reflection and case supervision for staff who work directly with people affected by homelessness. • Further steps to make roles and terms and conditions of staff as attractive as possible to prospective and current staff. <p>(<i>Ending homelessness report, Recommendation 3</i>)</p>	Support for workforces
4	<p>a) Welsh public services should provide support to enable all those working to tackle and end homelessness to take a psychologically informed approach in every aspect of their work. This support includes training, funding through commissioning frameworks and processes, and ongoing support and development for staff. Funding for people experiencing homelessness should be identified, protected/ring-fenced, and guaranteed in the longer term to enable effective planning, commissioning and continuity of service provision (<i>Ending homelessness report, Recommendation 4a</i>)</p>	Supporting psychologically informed approaches

	<p>b) Achieve a psychologically informed approach using the five elements (i.e. psychological framework; relationships; physical and social environment; staff training and support; and evidence and learning) on a whole organisation basis by:</p> <ul style="list-style-type: none"> • Extending the existing PATH training on psychologically informed environments to all homelessness and related services and to all roles, including those who set and monitor strategy and budgets as well as people who deliver face-to-face services. • Including a psychologically informed approach in the ending homelessness outcomes framework and commissioning. • Making training in trauma-informed approaches standard for all professionals in services who come into contact with people experiencing homelessness or at risk of homelessness. (<i>Ending homelessness report, Recommendation 4b</i>) 	
5	<p>The Welsh Government, public services, housing providers and support providers should ensure that people with lived experience of homelessness have opportunities to influence decisions and the delivery and evaluation of services to end homelessness (<i>Ending homelessness report, Recommendations 5</i>)</p>	<p>Ensuring people with lived experience are involved in every stage</p>
<p>Making homelessness rare: universal prevention</p>		
6	<p>The Welsh Government should work towards incorporating a human right to adequate housing in Welsh law. The aim should be a duty on Ministers and local authorities to have due regard to the right to adequate housing when making decisions, and for the right to be judicially enforceable (<i>Ending homelessness report, Recommendations 6</i>).</p>	<p>Legal right to adequate housing</p>
7	<p>a) Increase the supply of social housing by increasing the capital funding available for building social homes and ensure that supply of all types of housing (social, affordable, private and owner occupier etc.) is sustained at the right level based on regular projections for homelessness and housing need. These should be set out in local housing market assessments and local development frameworks should be based on this up to date assessment of need, supported by better evidence at a national level via a CORE-style data resource (i.e. continuous recording of data for social housing) (<i>Ending homelessness report, Recommendation 7a</i>).</p> <p>b) The grant framework for allocating funding to build social housing should be informed by an understanding of housing need, which includes homelessness via local housing market assessments. The grant rate allocated should reflect the additional costs of building certain types of housing, including housing for young people and people who need single</p>	<p>Practical steps to realise the right to adequate housing</p>

	<p>occupancy properties. The grant framework should support collaboration between housing associations and local authorities at grant allocation stage by requiring early conversations about the management of homes to support people currently experiencing homelessness, or at risk of it, to access and maintain tenancies (<i>Ending homelessness report, Recommendation 7b</i>).</p> <p>c) As well as increasing supply of social housing to the level set out in Recommendation 7a, ensure supply of all types of tenure (i.e. social rent, private rented sector, shared, and intermediate rent) is sustained at the right level, based on regular projections for homelessness and housing need for people at risk of homelessness and/or on low incomes (<i>Ending homelessness report, Recommendation 7c</i>).</p> <p>d) Increase the Housing Support Grant and homelessness prevention budget to help deliver support to people in all tenures and adequately fund the grant to deliver ending homelessness outcomes for people in all tenures of housing, as recommended by the Assembly's Equality, Local Government and Communities Committee. 36 Recommendation 7e: Local authorities must ensure provision of tenancy sustainment support for people in all tenures who may be at risk of homelessness, and tenancy readiness services for landlords and tenants. As part of this, work to develop a 'first alert for rent' process to help landlords and tenants to access earlier support in the event of any rent payment problems (<i>Ending homelessness report, Recommendation 7d</i>).</p> <p>e) Local authorities must ensure provision of tenancy sustainment support for people in all tenures who may be at risk of homelessness, and tenancy readiness services for landlords and tenants. As part of this, work to develop a 'first alert for rent' process to help landlords and tenants to access earlier support in the event of any rent payment problems (<i>Ending homelessness report, Recommendation 7e</i>).</p> <p>f) Welsh Government, housing associations and stockholding local authorities should agree and monitor delivery to cease all evictions into homelessness from social housing, and ensure that allocations policies do not exclude people experiencing homelessness or at risk of homelessness by ensuring 'reasonable preference' for people in this situation. Partners who deliver support services should be part of the pact between partners to end social housing evictions into homelessness that we recommended in our previous report (<i>Ending homelessness report, Recommendation 7f</i>).</p> <p>g) Enact the Renting Homes Act 2016 (and proposed amendments to the Act) to extend private rented sector contract notice periods but also commit to replacing the grounds for 'no-fault eviction' with new grounds that improve security for tenants and strike a better balance of rights and responsibilities with tenants and landlords (<i>Ending homelessness report, Recommendation 7g</i>).</p> <p>h) Ensure there are local private rented sector access and tenancy sustainment schemes to support landlords and tenants, and support the use of the private rented sector to provide housing for people at risk of homelessness, including a national bond scheme, the Welsh private rented sector leasing scheme, and an offer of mental health awareness training for private landlords via Rent Smart Wales (<i>Ending homelessness report, Recommendation 7h</i>).</p>	
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	<p>i) As part of delivering a ‘right to adequate housing in practice’ as recommended by the Action Group, the Welsh Government must ensure best practice is delivered in construction and that all methods of construction deliver good quality homes for all tenures, including any temporary accommodation that is needed. Housing in all tenures and communities should enable the effective support for people to stay in their homes (<i>This report, Recommendation 6</i>)</p> <p>j) The Welsh Government should undertake urgent discussions with landlords and support agencies to ensure that suitable temporary measures to increase security of tenure for tenants are in place until the Renting Homes (Wales) Act 2016 and the amendments to it come into force in 2021. This should include mandatory pre-action protocols for the private rented sector and work with social landlords to implement the financial assistance protocol and commitments to end evictions into homelessness (This report, Recommendation 8a)</p> <p>k) The Welsh Government and local authorities and their partners should continue to work with social and private landlords to reduce and end evictions into homelessness, provide tenancy support, and ensure there are tenancy relations services in place (This report, Recommendation 8b)</p>	
8	<p>a. The Welsh Government must make the case to the UK Government for:</p> <ul style="list-style-type: none"> i. Local Housing Allowance rates at the 30th percentile of local markets, to make sure that payments cover the cost of private renting ii. Removal of the benefit cap and the ‘bedroom tax’ iii. Removal of the restricted rate for under-35s in the private rented sector iv. Measures to ensure Universal Credit is fully accessible and provides support for people when they need it, including an end to the five-week waiting period from application point to receiving Universal Credit. v. Specialist homelessness support provision in all Job Centres Plus. <p>(<i>Ending homelessness report, Recommendation 8a</i>)</p> <p>b. Pending any change in housing and welfare policy by the UK Government, the Welsh Government must use its existing powers to come up with a strategic approach to the ‘Welsh benefits system’, making best use of the range of funds available to advance the Welsh Government’s policy objectives and relieve pressures on households and individuals, including:</p> <ul style="list-style-type: none"> i. Topping-up the Discretionary Housing Payment (DHP) budget and link an increased budget to homelessness prevention work, including no evictions into homelessness. ii. Working with local authorities to simplify and speed up the application process for DHPs, achieve more consistent administration, and examine how DHPs are used to support targeted, crisis and recovery prevention, and how an application for DHPs can trigger forms of support from other public services. As part of this consider pushing for full devolution of DHPs to Wales. iii. Considering the role of the Discretionary Assistance Fund in the prevention of homelessness, in particular supporting people to set up a home and establish sustainable tenancies. iv. Finding ways to increase take up of the Council Tax Reduction Scheme (CTRS). <p>(<i>Ending homelessness report, Recommendation 8b</i>)</p>	Influencing UK welfare policy

	c. The Welsh Government should prioritise Local Housing Allowance and the effect of the benefit cap on households in discussions with Ministers and Cabinet Secretaries from the devolved administrations and the UK Government. The desired outcome is to ensure the private rented sector is a viable option for people at risk of homelessness or experiencing it. (This report, Recommendation 5c)	
9	The Welsh Government should revisit and revise child poverty targets and examine the impact of the socio-economic duty on child poverty , to ensure Wales takes all the necessary steps needed to reduce and eradicate child poverty. This should also include a review of existing spending and partnership approaches, particularly greater involvement in identifying and addressing housing issues through workforces in early years, Families First, teams around the family, and Flying Start (<i>Ending homelessness report, Recommendation 9</i>).	Tackling child poverty
10	We recommend that there is strategic alignment between the Ending Homelessness Framework and the Delivery Plan for the Adverse Childhood Experience Support Hub 2020-2021 , to identify and maximise any opportunities to prevent homelessness (<i>Ending homelessness report, Recommendation 10</i>)	ACEs and ending homelessness
11	Welsh Government and relevant public services should institute a child's right to be noticed and have adverse experiences identified and appropriately responded to , building on the Rights of Children and Young Persons (Wales) Measure 2011, bids for child-friendly cities, and the focus on supporting the first 1,000 days of a child's life (<i>Ending homelessness report, Recommendation 11</i>)	Identifying and responding to adverse experiences
12	<p>a) Public services should take a lead in reframing communication on homelessness, drawing from evidence on framing homelessness, framing poverty and learning from the Homeless World Cup 2019 (<i>Ending homelessness report, Recommendation 12a</i>).</p> <p>b) The Welsh Government should fund and actively support an ongoing public awareness campaign about homelessness to increase understanding and reduce stigma about homelessness in Wales, learning from the Time to Change Wales campaign and the Homeless World Cup. These approaches should be quickly reviewed and insights from them adopted for wider and ongoing public perceptions communication, and tailored with calls to action for specific audiences (such as the public, businesses, charities, public services, political leaders and government) (<i>Ending homelessness report, Recommendation 12b</i>).</p> <p>c) The Welsh Government should work with partners to provide communication support, working with professional communicators across the housing and homelessness sectors and in local and national government, to help local coordination cells work effectively with volunteers and community assets. The support should also help local partners to challenge unhelpful communication about homelessness and promote good practice in public and media discussion about the causes of homelessness and its solutions (<i>This report, Recommendation 3</i>)</p>	Communications needed to end homelessness

	d) The Welsh Government and charity partners should continue to carry out communication campaigns that help people identify as being at risk of homelessness or experiencing it, and for friends, family and colleagues to recognise the potential signs of homelessness risks in others and know how to refer people for support (This report, Recommendation 7)	
Making homelessness rare: targeted prevention		
13	<p>Welsh Government and its partners should lead a change in public services to ensure homelessness is prevented before crisis stage (i.e. before the current statutory definition of 56 days). This approach should include:</p> <ul style="list-style-type: none"> • The ending homelessness outcomes framework with the data needed to monitor and evaluate progress, with accountability and potential regulation. • Strategic support for the workforce to deliver against the outcomes framework in a trauma-informed way. • Making sure that local, regional and national strategy-making, planning and commissioning/budgeting processes can deliver against the outcomes framework to make homelessness rare, brief and non-repeated and to ensure the housing supply and support needed to achieve this. • Welsh Government leadership, including relevant Cabinet members and leads from local authorities, health boards and other public services. • A focus on evidence. • Regional and local partnerships. <p><i>(Ending homelessness report, Recommendation 13)</i></p>	Preventing homelessness at an earlier stage
14	<p>a) Welsh Government, delivery partners and public services should agree and implement clear prevention and rapid rehousing pathways of tailored support for people in the following risk groups:</p> <ul style="list-style-type: none"> • People leaving prison/the secure estate or in contact with a youth offending team, particularly around the point of release/discharge. • Young people experiencing homelessness. • Care experienced young people who are extremely vulnerable to the risk of homelessness. • People with physical or mental health problems or learning disabilities. • Children and young people in schools and education settings. • People with drug and/or alcohol problems. • People experiencing violence (against women and other people), domestic abuse, and sexual violence – and survivors of these experiences. • LGBTQ+ people • People presenting to a Jobcentre Plus for advice and support. 	Preventing homelessness for people more at risk

	<ul style="list-style-type: none"> • People experiencing rent/tenancy difficulties. • People leaving the armed forces. <p>(Ending homelessness report, Recommendation 14a)</p> <p>b) Public services should demonstrate that they are providing the appropriate mix of interventions³⁷ to ensure maximum prevention and rapid rehousing for all the target groups at particular risk of homelessness (Ending homelessness report, Recommendation 14b)</p>	
15	<p>a) Ensure everyone discharged from a public institution has a suitable sustainable housing solution in place, and implement prevention and rapid rehousing pathways (refining existing pathways if necessary) agreed to support people's housing needs before, during and after they leave the NHS, the care system, or the secure estate. This should be one of the outcomes in the ending homelessness outcomes framework (Ending homelessness report, Recommendation 15a).</p> <p>b) The Welsh Government should consider further legal duties for prevention, referral and/or co-operation on public bodies if needed to achieve the goal of zero discharge into homelessness (Ending homelessness report, Recommendation 15b).</p>	Discharges with housing and support
Making homelessness rare through crisis prevention		
16	<p>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. The Welsh Government should:</p> <ul style="list-style-type: none"> • Extend the definition of 'at risk' from 56 days to six months for all public services. • Extend the duties to prevent and relieve to wider public bodies beyond housing. • Implement the recommendation from our rough sleeping report to remove barriers and address misunderstandings that currently stop people accessing housing and support, including priority need, intentionality and local connection tests, and the Vagrancy Act. Replace these with actions to end homelessness as recommended in the Action Group's framework for ending homelessness (i.e. a right to adequate housing, maximum prevention, and rapid rehousing for those experiencing homelessness). <p>(Ending homelessness report, Recommendation 16)</p>	No wrong door to support

³⁷ For a non-exhaustive list of potential support see: Homelessness Action Group (2020), *What ending homelessness in Wales looks like*, Annex 4, p.60-61

17	<p>a) The Welsh Government should advance the application of an evidence-based harm reduction approach to the management and policing of substance use, including finding a solution to enable the implementation of Enhanced Harm Reduction Facilities. This will require working with the UK Government to make the case for allowing these approaches in the England and Wales legal jurisdiction (<i>Ending homelessness report, Recommendation 17a</i>).</p> <p>b) Welsh Government, Substance Misuse Area Planning Boards, health boards, and local authorities should ensure that Heroin Assisted Treatment is available across Wales (<i>Ending homelessness report, Recommendation 17b</i>).</p>	Harm reduction approach
<p>Making homelessness brief and non-repeated through rapid rehousing</p>		
18	<p>Welsh Government and local authorities should lead a transition in the support system over time to prioritise sustaining tenancies and rapid rehousing (including Housing First where appropriate) as the default approach for people who are at immediate risk of homelessness or are already experiencing it. By the end of a transition period of up to five years, rapid rehousing approaches should be scaled-up and acute spending scaled down but still needed for short-term support and accommodation for a smaller number of people (<i>Ending homelessness report, Recommendation 18</i>).</p> <p>The Welsh Government should continue to support longer term transition planning beyond the initial 9-month phase two period, working with local authorities to help phase out tests for local connection, intentionality and priority need; to deliver the five-year vision for temporary and permanent accommodation supply including definitions of suitability and guidelines on rapidity; to continue to fund transition to rapid rehousing and prevention work; and ensure each local area has an action plan to achieve the rapid rehousing outcomes for everyone, with all partners taking ownership and supporting each other (<i>This report, Recommendation 4</i>).</p> <p>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 (<i>Rough sleeping report, Recommendation 1</i>).</p>	Transition to rapid rehousing and continuing assertive outreach support
<p>Ending migrant homelessness</p>		
19	<p>Welsh Government should help prevent and end homelessness specifically for people who have migrated to Wales from outside the UK by:</p>	Ending migrant homelessness across the UK

	<ul style="list-style-type: none"> • Making nationals from the European Economic Area (EEA) with a right to reside eligible for statutory homelessness assistance. • Providing guidance to local authorities, clearly setting out the duties owed to migrant households with no recourse to public funds. • Considering how best to grant access to the statutory homelessness system for people with migrant status, in consultation with the UK Government, and alongside access to any other services needed to help end someone's homelessness (e.g. health services, employment support, access to benefits, and drug and alcohol support). • Making available a properly supported and voluntary (in word and spirit) end-to-end reconnection service to enable people to relocate to their country of origin rather than become homeless in Wales, only if this is in their best interests and is their preferred option. • Ensuring availability of short-term, suitable emergency accommodation and independent immigration advice for migrants who are homeless, or at imminent risk of becoming homeless to prevent and end homelessness, drawing from the review, commissioned by the Welsh Government, of accommodation options.³⁸ • Lobbying the UK Government to make changes to UK law and policy to facilitate better housing-related support for people with migrant status, including extending the move-on period for newly recognised refugees from 28 days to 56 days. • Lobbying the UK Government to allow survivors of VAWDASV (violence against women, domestic abuse and sexual violence) who have no recourse to public funds to access housing and support services. <p><i>(Ending homelessness report, Recommendation 19)</i></p> <p>As previously recommended by the Action Group the Welsh Government should lobby the UK Government to permanently lift restrictions for support for people with no recourse to public funds so that people can be helped after the public health emergency (<i>This report, Recommendation 5a</i>).</p> <p>With the UK set to fully leave the European Union at the end of the transition period, the Welsh Government should also ensure EEA nationals are supported to apply for the EU Settlement Scheme in the UK (<i>This report, Recommendation 5b</i>).</p>	
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³⁸ Petch, Heather and Stirling, Tamsin (forthcoming) *Providing accommodation for refused asylum seekers in Wales*: <https://gov.wales/sites/default/files/publications/2020-08/feasibility-study.pdf>

