

Welsh Government Integrated Impact Assessment Summary

Title of proposal: Ending Homelessness Outcomes Framework

Department: Housing and Regeneration

Cabinet Secretary/Minister responsible: Julie James, Minister for Climate Change

Start Date: June 2023

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What action is the Welsh Government considering and why?

A Homelessness Action Group (HAG) was set up in 2019 to advise Welsh Ministers on the steps needed to end homelessness in Wales. It recommended that a homelessness outcomes framework would provide a clear strategic direction for preventing and ending homelessness across all Welsh public services, housing, and support providers.

Building on the work and recommendations of HAG and our 2019 Strategy for Preventing and Ending Homelessness, Welsh Government published an Ending Homelessness Action Plan (EHAP) in November 2021. EHAP sets out the high-level actions Welsh Government and partners will take over the next 5 years to end homelessness. These actions draw out the key components required to make homelessness rare, brief and unrepeated and recognises the overarching importance of partnership working. A key action is to develop a new Ending Homelessness Outcomes Framework (EHOF) which identifies the long-term outcomes for ending homelessness in Wales and measuring progress against these outcomes.

This new Outcomes Framework sits with the context of the wellbeing goals for Wales, which capture many of the structural factors that can influence homelessness and is relevant across all government sectors.

Long term

The EHOF will have a long-term impact on monitoring the delivery of housing and homelessness services. It has been developed to demonstrate the impact of, and progress against, actions set out in our EHAP and increase the accountability of all stakeholders who have a role to play in ending homelessness. It will be key in setting out what "good" looks like and measuring our collective progress in achieving our long-term goal of preventing and ending homelessness in Wales.

The Framework directly contributes to monitoring progress towards achieving the Programme for Government (PfG) commitment to "Fundamentally reform homelessness services to focus on prevention and rapid rehousing".

A particular challenge identified during development of the EHOF is evidencing some of the proposed outcomes in the immediate future. For some proposed outcomes, no existing data is currently collected and others require changes to existing data collections. Throughout, the EHOF has been developed through engagement with officials in Welsh Government's Knowledge and Analytical Services Division to seek their expert views on feasibility of future data collections.

The formal consultation on the proposed EHOF will seek to draw on stakeholders' views and expertise to identify whether the proposed outcomes and data indicators are fit for purpose, and also whether there are any existing data collections that have not been identified by officials that could help to measure progress.

Development of the EHOF has also reflected the cross-government response required to support our ambitions to prevent and end homelessness. Therefore strengthening cross-government and partnership working will be essential to this and this links with ongoing work to reform homelessness policy and legislation in line with our PfG commitment. It therefore is recognised that the EHOF will need to evolve over time to reflect any new legislative duties identified from this wider reform.

Prevention

Our core vision - as set out in our EHAP, the PfG and the EHOF - is underpinned by a strong focus on early intervention and prevention. The EHOF comprises **six overarching strategic outcomes**, underpinned by **24 detailed outcomes** and **44** supporting **data indicators** which will take significant steps towards measuring progress towards our long term ambition to end homelessness.

The strategic outcomes reflect our vision to end homelessness and where it cannot be prevented, that it should be rare, brief, and un-repeated. The 'Rare' strategic outcome focuses specifically on preventative measures; The 'Brief' strategic outcome focuses on the transition to rapid rehousing and 'Un-repeated' on targeted prevention. The other strategic outcomes -'Workforce', 'Public services', and a 'Person-centred approach' - reflect key themes and policy principles in our Action Plan.

Diagram 1: Ending Homelessness Outcomes Framework Strategic Outcomes



Integration

A core policy principle of the EHAP is that tackling and preventing homelessness is a public services matter – rather than only a 'housing matter'. Therefore all public services and the third sector have a role to play in achieving our long-term goal of ending homelessness. To achieve this, we need to address core structural issues such as poverty and inequality. Ending homelessness is a cross-sector priority relevant to health, social services, education, criminal justice, community services and the wider economy. Key actions in the EHAP recognise this and reflect an 'all public services' response.

As set out in **Diagram 1**, Strategic Outcome1 'Rare: *People are prevented from experiencing homeless in the first place as early as possible*' and Strategic Outcome 5 '*All public services work effectively to end Homelessness*' reflect these ambitions.

Accountability and partnership working will therefore be important to achieve our goal. We have developed close joint working relationships within Welsh Government. An Ending Homelessness Legislative Programme Board has been established to assist in the development of a Bill to fundamentally reform homelessness systems and services in Wales in order to end homelessness. The Board includes senior representation from Welsh government policy areas such as Health, Social Services, Community Safety, Education and Equalities. This Board aims to build and inform a culture of co-production and partnership working across Wales to ensure that preventing and ending homelessness is considered as a public services matter, not just solely as a 'housing matter'.

The Ending Homelessness National Advisory Board (EHNAB) is responsible for advising Welsh Government and partners on the cross government policy response to preventing and ending homelessness. It therefore plays a key role in overseeing and informing the implementation of the EHAP.

EHNAB also has a number of sub-groups that are responsible for advising on the implementation of specific actions in the EHAP. One of these will be a newly developed Strategic Health Inclusion Group. It will be responsible for agreeing an annual programme of work to support strategic coordination around public health and health care service provision, including primary care to reduce inequalities and improve health outcomes for inclusion health populations in Wales.

Collaboration

In November 2021, Welsh Government established an Ending Homelessness Strategic Task & Finish Group to co-produce the new EHOF. The group's membership comprises key external stakeholders (Cardiff University, Cymorth Cymru, Centre for Homelessness Impact, local authority representatives, Service Providers, Public Health Wales, Tai Pawb and Shelter Cymru), who have worked collaboratively to provide expert advice. The Strategic Task & Finish Group is a sub-group of the EHNAB.

Since its establishment, the Task & Finish Group has provided a forum for members to debate and inform the desired long-term outcomes for the people of Wales. This consideration has been informed by the key themes, policy principles and agreed actions - as defined in the Ending Homelessness Action Plan - that are needed across homelessness and housing services, the third sector and across wider public services in Wales to prevent and end homelessness.

In parallel, the proposed detailed outcomes have been tested with two other Task & Finish sub-groups that also report to the EHNAB:

- The Rapid Rehousing Task and Finish Group, whose role is to advise and support Welsh Government officials to deliver the national transition to a Rapid Rehousing approach to delivering homelessness services, has advised on development of Strategic Outcome 2: Brief
- The Workforce Task and Finish Group, whose role is to focus on an agreed work plan setting out immediate workforce pressures and longer term outcomes for workforce, has advised on development of Strategic Outcome 4: Workforce

Development of the EHOF has also drawn on the Centre for Homelessness Impact's SHARE Framework which provides a common vision identifying action areas, goals and indicators used to measure the progress being made against each goal and vision of ending homelessness.

Throughout its development, we have also drawn on the expertise of Welsh Government's Knowledge and Analytical Services (KAS) who have undertaken an in-depth review of the proposed indicators. Consideration has been given to the availability of existing data sources and feasibility of future data collections, to ensure that the proposed 'data indicators' accurately inform and measure progress against each detailed outcome.

Involvement

The EHOF itself will not directly result in changes to the delivery of housing and homelessness services in Wales. However, it will be an important tool to measure high-level progress towards preventing and ultimately ending homelessness in Wales. It therefore will be an important mechanism to inform this progress and could influence changes to delivery of services or policy approaches as a result.

As noted above, a Task & Finish Groups has provided expertise to co-produce the Ending Homelessness Outcomes Framework.

We are undertaking a 12 week consultation on the EHOF from June 2023 and will use feedback to inform the development of the final Outcomes Framework which will be published later in 2023.

While the EHOF has been co-produced with a Task & Finish Group, Welsh Government will undertake supporting engagement activity during the consultation period, guided by key questions set out in the consultation.

Given the technical nature of the EHOF, these engagement events will be an opportunity to widen awareness and understanding of the key purpose of the EHOF and its future use, as well as to gather specific feedback about the proposed strategic outcomes, detailed outcomes and underpinning data indicators.

The engagement activity will be targeted towards key partners such as local authorities, third sector organisations, Registers Social Landlords, and wider public services, as well as people with lived experience of homelessness.

Furthermore, in parallel to development of the EHOF, officials have also updated the outcomes framework for the Housing Support Grant (HSG), for implementation from April 2023. The HSG was introduced in April 2019. The overall grant purpose is to prevent homelessness and support people to have the capability, independence, skills, and confidence to access and/or maintain a stable and suitable home and it is Welsh Government's primary grant mechanism to prevent homelessness.

The HSG Outcomes Framework is an operational tool to measure the effectiveness of a grant programme and is a sub-set of the wider EHOF. The HSG Outcomes Framework is a sub-set of the wider EHOF. The updated framework has been developed in consultation with key stakeholders who are commissioners, providers and frontline workers of HSG services.

In Autumn 2022 the Welsh Government held four virtual engagement events with local authority representatives and homelessness and housing service providers about the new proposed HSG Outcomes Framework. In total 190 stakeholders attended these events. The Welsh Government also held a 'check-in' session in early November 2022 with local authorities and support providers who are piloting a first draft of the Outcomes Framework.

Feedback from these events and the pilot has shaped the final version of the new outcomes framework, which was published in January 2023 before its planned implementation in April 2023. Welsh Government also issued supporting Guidance in January 2023 and held four virtual training events in February 2023 to March 2023 for local authority staff and support providers. A total of 1,700 individuals attended these events.

Impact

There is currently no existing Ending Homelessness Outcomes Framework. Wales is also the first UK nation to develop an Outcomes Framework for ending homelessness.

Developing a new EHOF is a key Action (Action 13) in the EHAP, and the EHAP itself was subject to public consultation before it was published in November 2021. There was no opposition to producing a new Ending Homelessness Outcomes Framework. The EHOF has been co-produced with a Task & Finish Group (see Section 'Collaboration') to provide a clear strategic direction for preventing and ending homelessness in Wales by identifying the desired long-term outcomes and illustrate progress towards achieving these outcomes over time.

The Framework will need to be agile and will evolve over time to ensure it remains fit for purpose. This includes being reviewed following the forthcoming policy and legislation reform in line with the Programme for Government 2021-2026 commitment, to ensure our Outcomes remain relevant to evidencing our progress towards ending homelessness across Wales. It will then be reviewed at three-year intervals after this point.

Given the EHOF's importance in being able to measure and monitor progress over time in the implementation of actions in the EHAP, there are few arguments against implementing a new Framework. The main consideration is the resource implications for local authorities and housing support providers (and in turn, on Welsh Government's KAS resources) to collect new data over time where data gaps currently exist.

These considerations are part of ongoing work with policy and KAS colleagues to inform developments and improvements to statutory data collections and monthly management information, who in turn are engaging with local authorities about the resource implications.

The proposed EHOF is also being consulted upon to further inform its development before it is finalised later in 2023. This consultation will be supported through consultation events with a range of stakeholders (see Section on 'Involvement').

Wider consideration of resourcing will be explored during the consultation period. Furthermore, several data indicators identified in the EHOF will be aspirational and are intended to guide future development for data collections.

Costs and Savings

The production and implementation of a new Ending Homelessness Outcomes Framework itself will not result in direct costs. Its development and future implementation is being overseen by Welsh Government officials and is included within existing staffing resources. Its coproduction with external stakeholders has also not resulted in direct costs, due to these stakeholders already being actively involved in driving forward cross-partnership working to prevent and end homelessness in Wales through their own work areas and through their involvement with various areas of policy development.

However, there is likely to be indirect costs in the near future related to potential changes to the IT systems and data recording and reporting mechanisms within local authorities and homelessness and housing support providers. This will relate to capturing new or enhanced data collections in the near future, in order to capture 'data indicators' against the proposed outcomes that comprise the wider Framework.

The exact cost of these changes is not yet known and will likely be included within stakeholders' own arrangement for updating their IT systems at intermittent points. These costs implications will likely be drawn out through the EHOF consultation, and through parallel work led by Knowledge and Analytical Services staff to drive forward improvements to annual and monthly data collections on homelessness.

Our commitment to focus on preventing homelessness, and in particular early prevention, is based on an 'invest to save' approach, thus avoiding more costly acute

interventions/spending later on. In a report published by the Homelessness Action Group in March 2020, the cost of addressing crises can be significant. One estimate found that the cost of a person rough sleeping for 12 months was more than £20,000 but the cost of a successful intervention was around £1,400¹. It should be noted that this estimate was based on research carried out in 2015, before the pandemic, and would not reflect changes to average costs based on more recent data.

The Auditor General for Wales' report 'Rough Sleeping in Wales – Everyone's problem, No One's Responsibility' published in July 2020 estimates that every single episode of rough sleeping costs the public purse £53,082. It also noted that the Welsh public sector spends up to £209 million reacting but not solving rough sleeping.

Previous research on impact of Housing Support Grant (HSG)

A report co-produced by Cymorth Cymru and Cardiff Metropolitan University also provides evidence on how investing in homelessness and housing support services, through grant like the Housing Support Grant, which is a preventative grant, can reduce pressures on other public services.

Cymorth Cymru and Cardiff Metropolitan University co-produced research into the social and financial impact of the HSG; published in July 2020. In relation to the financial impact, it is estimated that the HSG generates a gross annual saving to public services of £300.4m, or a net annual saving of £176.7m (when taking in to account the annual HSG spend at the time). This represents an estimated net saving to public services in Wales of £1.40 for every £1 of funding for HSG. In addition, it estimated that every £1 of HSG funding generates an estimated net saving of £5.20 for mental health services.

The research suggests that HSG services generate estimated savings for health services which include an estimated annual gross saving of:

- £138.7m to health services, with the savings generated for health services accounting for 46% of the total gross benefit of the grant;
- £97.9m for mental health services;
- £14.4m for support for women who experience domestic abuse;
- £10.6m for support for drug and alcohol abuse.

The research estimates that there are also savings for both the Social Care sector (£120.6m) and the criminal justice system (over £47.9m). In addition, the research identifies a number of important un-costed outcomes i.e. improvement in people's health in general (or perceived health), improved quality of life for individuals and therefore individuals' health and wellbeing is substantially improved as they receive support. Therefore not only does the HSG generate estimated cost saving for broader public services, it enables individuals to consider themselves and their lives more worthwhile.

¹ Pleace, N. (2015) At what cost? An estimation of the financial cost of single homelessness in the UK. London: Crisis

Conclusion

How have people most likely to be affected by the proposal been involved in developing it?

The Ending Homelessness Strategic Task & Finish Group have been integral in coproducing the new EHOF. The group's membership comprises key external stakeholders (Cardiff University, Cymorth Cymru, Centre for Homelessness Impact, local authority representatives, Service Providers, Public Health Wales, Tai Pawb and Shelter Cymru), who have worked collaboratively to provide expert advice.

Our consultation will ensure that stakeholders have an opportunity to provide their views on the draft EHOF. We also intend to hold engagements events which will further inform our thinking before we finalise the EHOF. We will work collaboratively with key partners such as Cymorth Cymru and use their existing networks/forums to engage with stakeholders and possibly engage with people who have lived experience of homelessness and housing-related support services. Cymorth Cymru's Experts by Experience provides opportunities for people with lived experience to share their views and experiences in order to influence policy and practice across Wales.

What are the most significant impacts, positive and negative?

The purpose of the EHOF is to provide a clear strategic direction for preventing and ending homelessness in Wales by identifying the desired long-term outcomes and illustrate progress towards achieving these outcomes over time. It has been designed to demonstrate the impact of, and progress against, the high-level actions set out in our Ending Homelessness Action Plan (EHAP) and increase the accountability of all stakeholders who have a role to play in ending homelessness.

Wales is the first nation in the UK to develop an EHOF. Whilst it may not directly change our policy direction in the short term it will help us to monitor our high-level progress against the outcome areas. It will provide a clear understandable narrative of what actions are successful, and where resources may need to be prioritised.

In light of the impacts identified, how will the proposal:

- maximise contribution to our well-being objectives and the seven well-being goals; and/or,
- avoid, reduce or mitigate any negative impacts?

Under the Well-being of Future Generations (Wales) Act 2015, there is a requirement to ensure decisions maximise the contribution to the well-being goals. The EHOF seeks to contribute towards these goals, (specifically a healthier Wales, an equal Wales, a prosperous Wales and a Wales of cohesive communities) by providing a clear strategic

direction for preventing and ending homelessness across Welsh public services, housing and support providers. The EHOF will demonstrate the impact of, and progress against, actions in our Ending Homelessness Action Plan and increase the accountability of all stakeholders who have a role to play in ending homelessness.

The requirement for local authorities and third sector providers to collect data to evidence indicators in the EHOF could be a potential negative impact as it will likely result in additional data collections which will have resource implications. Our consultation and engagement events will draw out any specific concerns that local authorities and third sector providers may have. To try and mitigate any impacts/risks our KAS colleagues are leading work with local authorities to explore how improvements can be made to future data collections, while balancing the need to minimise burden on key data providers, namely local authorities.

How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?

The Ending Homelessness Outcomes Framework has been designed to demonstrate the impact of, and progress against, actions set out in our Ending Homelessness Action Plan and increase the accountability of all stakeholders who have a role to play in ending homelessness.

This Ending Homelessness Outcomes Framework will provide a clear narrative of where we have made progress towards achieving the identified long-term outcomes. It will therefore inform future policy proposals and allow us to identify and address areas where there is no data currently collected.

As such, the EHOF will continue to evolve over time, to ensure it is relevant and responsive to the environment we operate in and the data available. The EHOF will be reviewed following the forthcoming policy and legislation reform in line with the Programme for Government 2021-2026 commitment, to ensure our outcomes remain relevant to evidence our progress towards ending homelessness across Wales. It will then be reviewed at three-year intervals after this point.

Declaration

I am satisfied that the impact	of the proposed	action has been	n adequately	assessed	and
recorded.					

Name of Senior Responsible Officer / Deputy Director: Sarah Rhodes

Department: Housing and Regeneration, CCRA

Date: 2 June 2023

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

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