

expertise is utilised to ensure appropriate decisions are made about people with mental health problems who present as homeless.

Intentionality

We would prefer to see the phasing out of the intentionality test, but while it remains we would like to see the guidance strengthened to ensure consistency and fairness in its application. It should not be used to avoid fulfilling homelessness duty for vulnerable people, including former prisoners. We also believe that local authorities should consider whether people who are regarded as having made themselves intentionally homeless require support and ensure that they are signposted or referred appropriately.

Cooperation between bodies

We support the intention to improve cooperation between local housing authorities, social services authorities and social housing organisations. However, we believe that the Bill also needs to strengthen cooperation between housing and other statutory and non-statutory agencies in health and the criminal justice system. This is particularly important for people with mental health problems and would recognise the challenges outlined in the Wales Audit Office review into housing services for adults with mental health needs. It would also reflect the challenges that we see in our work with people facing discharge from mental health wards and help to mitigate the impact on former prisoners of the planned changes to priority need.

As a result, we believe that local health boards should be added to section 78(5). Although we recognise that the Welsh Government cannot place a duty on non-devolved areas such as the prison and probation service, we believe it would be helpful to add a subsection that places a duty on local authorities to engage with these bodies.

Gofal is an active member of Cymorth Cymru, and as such we support their written evidence and we are confident that our views will be reflected during their oral evidence session on the 23rd January 2014.