

1) The impact of wider policy developments on the programme including:

**The overall clarity of the of the Programme's objectives:**

The implications of, and emerging response to, the UK Government's Supported Accommodation Review; Detailed recommendations in the UK SAR apply to England only, so it is difficult at this stage to assess the potential impact of the SAR in Wales. In theory, the move from HB to grant funding is a positive one, removing the issue of short-term supported housing being beyond the means of people not in receipt of HB, due to the higher costs associated with this type of accommodation. However, the move will take another funding stream away from providers and into the control of local authorities. Where the funding sits within LAs and how this is ring-fenced, managed and administered will be of upmost importance to ensuring the housing needs of vulnerable people are able to be met. In England, where SP is no longer ring-fenced, it appears that some providers are already expressing concern at how robust the ring-fence on the proposed short-term housing grant will be in the longer term.

How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments; More timely communications about developments and priorities would make local authorities and service providers better able to plan ahead. Better communication between WG departments, ensuring a more consistent message to local authorities and providers, would also be helpful.

How best to align the work of Regional Collaborative Committees with other collaborative governance arrangements; This will be very much dependent on the outcome of Flexible Funding proposals.

The lessons to be learned from the mixed effectiveness and impact of regional working over the past five years; A well-established RCC in North Wales has enabled some positive progress with regards to regional working; however, there remains significant barriers to further success due to the variances in the application of Financial Regulations across LAs.

## **2) Monitoring and evaluation including:**

How monitoring/outcome data is used to inform decision-making about programme expenditure and contract monitoring; Our regional Performance Monitoring Returns serve us well to be able to monitor spend and claw back where required. The Outcomes data, as has been identified, is less useful in its current format; there is much room for subjectiveness in recording the data. The move towards a national outcomes database would be welcomed.

The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework; We welcome the opportunity to comment on the proposed changes as they develop, however, they do seem very draft at present and we would welcome further opportunity to be consulted as the Framework develops.

How any revised outcomes framework arrangements can be best communicated and embedded; A National Database to remove some of the inconsistencies and subjectiveness in recording

Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services; The new draft guidance seems to move away from benchmarking of costs; this will make the VFM assessments of comparable services potentially more difficult. Some clarity and further guidance around the funding and modelling of services would be welcome if we are expected to be scrutinised for our monitoring here.

## **3) The distribution of Programme funding and financial planning including:**

The issues that need to be considered in developing and implementing any new funding formula; Homelessness and rough sleeper figures across LAs

How budget pressures and funding uncertainty have affected service planning and delivery; Budget pressures and funding uncertainty have had an adverse effect on service planning and delivery. Service providers have worked effectively with the Council to find innovative solutions and efficiencies, but constant pressure to 'do more with less' eventually takes its toll. The withdrawal of other funding such as Communities First, and the present uncertainty around the future of other funding including Supporting people has already led to the loss of some services and places a strain upon working relationships between local authorities and providers.

Reasons for the identified wide variation in financial support for different client groups across local authorities; This may in part be explained by the fact that there is no typical SP service provision. Even within client groups, levels of need and hence level /intensity of support may vary, and service costs will vary.

Demographic variations between local authorities will mean that some local authorities have higher concentrations of particular client groups, or clients with higher or lower need levels, than others. Since SP is led by, and responsive to, need this will inevitably lead to variations in financial support for different client groups across local authorities.

Reasons for the noticeable change in the overall proportion of programme funds spent on floating and fixed support; Potentially due to lack of clarity over definition – this is not made easier in the draft guidance.

The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical patterns; Needs mapping data has not provided a robust data source for future service planning; this has tended to report what service delivery is happening rather than gaps in service provision.

Homelessness statistics are more useful.