

Tai Pawb is a membership organisation, with over 70 members from housing, equality and related sectors. Majority of our activities focus on the housing management role of social landlords. Several of our members are support providers and support providing arms of housing organisations. We have trained and supported those organisations in relation to their equality obligations and best practice in the past and we also have a place on the Gwent Regional Collaborative Committee. Our understanding of the supporting people funding and consequently the response to this inquiry should be viewed in this context.

### **1. Welsh Government proposals to remove the budget ring fence for Supporting People in April 2019.**

Whilst Tai Pawb welcomes approaches which would allow for alignment of strategic priorities and reduction in bureaucracy, we also understand concerns about what this move might mean for the long-term protection of funding for housing-related support in Wales.

We would echo concerns expressed in other evidence submitted to the committee, including the response from Cymorth Cymru. In order to avoid duplication, we will not be expanding on well evidenced arguments submitted by other organisations and referenced in their submissions. The key points are supported by hard evidence of real negative impact of a similar decision in England, including:

- reductions in grant of up to 80% in some areas
- a vast reduction in targeted and specialist support (e.g. support for Rough sleepers, reduced from 28% to 7%; People with mental health problems, reduced from 22% to 4%, Prisoner leavers, reduced from 16% to 1%.)
- several groups going from previously targeted services to having none including sex workers, refugees, irregular migrants and disabled people.
- Local Authorities using flexibility to prioritise statutory services often to the detriment of supporting people services

The last point in particular can be a difficult one to argue, especially in light of the short term nature of funding and therefore monitoring and evaluation of the impact of non-statutory services. The details of the impact of SP services have been well documented by Cymorth and Gwent RCC in their responses. The key point for Tai Pawb is that an investment in preventative and early intervention focused SP services can reduce the demand for statutory homelessness and other services which are often used to treat symptoms rather than causes of homelessness and are often used at a point where the damage to an individual and/or their family has already been done or the risk of such damage is much greater.

It is our understanding that the main focus of the SP programme is on prevention and early intervention. This role is especially significant in the context of the changes to the homelessness legislation, with increased focus on prevention, changes in the role and culture of the homelessness and housing options teams. The new homelessness prevention duties have so far proven successful in preventing people from becoming homeless but they have also added pressure on homelessness teams, for example in terms of the numbers of people approaching local authorities and the increased intensity of service provided to those people.

Supporting people often prevents people from becoming homeless before they reach the statutory homelessness stages and can therefore be understood as having a very significant impact on not only the lives and outcomes for vulnerable service users but also as an important lever in relieving the pressure on local authorities' increasingly stretched homelessness services. In fact there is an argument for any new SP and Homelessness Frameworks to take into account, measure and monitor SP support as part of the homelessness statistics monitoring.

Therefore, we believe that any concerns related to the potential for supporting people funding to be reduced as a result of the development of a potential super-grant should be given serious consideration as the impact of any reduction in funding can have serious consequences for service users and lead to an increase in homelessness.

The above concern is all the more pertinent as most of the groups supported through the programme are not only vulnerable but also share a protected characteristic and have been targeted by the programme due to evidenced need, including lack of or gaps in service provision elsewhere. This includes women suffering domestic violence and abuse, young people, refugees, Gypsies and

Travellers, people with mental health issues, with learning disabilities and age-related vulnerabilities.

Any decision leading to a potential reduction, realignment of funding or provision of more generic services in favour of specialist support should therefore not be made before considering the equality and human rights impact of such decisions on those groups of people and whether any potential reductions can be considered as a proportionate means of achieving a legitimate aim. The needs of the above groups are often such that a specialist service is the only legitimate way to deliver support.

A successful legal challenge brought in by the clients of Southall Black Sisters against Ealing Council <sup>1</sup> is one example of a case where assessment of equality impact was poor and a decision was made to remove a specialist BME service in favour of a more generic service to women experiencing domestic abuse. This decision and lack of appropriate assessment (as well as poor quality of equality evidence used) was legally challenged and overturned.

We understand that the Full Flexibility Pathfinder pilot will run from April 2018 to March 2019 with the proposal to implement the super grant from March 2019 to April 2020. It is questionable to what extent the pilots would actually serve their purpose and how meaningful monitoring and evaluation of the pilots (including equality aspects) could take place in order to inform the development of the super grant system being rolled out immediately after the pilots.

There is therefore little scope for the pilots to inform super grant framework in any meaningful way. There would also be no time to undertake an equality impact assessment based on real evidence (especially that the equality data collected during the pilots would be very extensive and complex considering the scope of the new grant) and for this assessment to influence or inform any meaningful decisions. The tight timescales therefore carry a real risk of contributing to the contravention of the Equality Act 2010.

There are of course potential benefits to developing a super grant system including less bureaucracy, flexibility between different streams and a much more integrated

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<http://www.bailii.org/ew/cases/EWHC/Admin/2008/2062.html>

working. Any new potential framework however, would need to be based on an extremely comprehensive needs mapping and population wide evidence across a multitude of different needs and vulnerabilities.

The real danger of having a combined assessment of needs to establish the basis for grant distribution model is the temptation to avoid inadvertent complexities linked to specific needs (which can often only be well understood by specialist SP staff). Generic needs assessments run the danger of missing the detail needed to explore the needs of specific populations and of course a big needs assessment can often miss things and people out (especially where certain populations are consciously or subconsciously perceived as less deserving and have to compete for funding with groups which are much more likely to gain public support).

A decision of how a grant stream is to be distributed when the grant is focused on such a multitude of groups is therefore fraught with difficulties. The potential for a reduction in SP teams can mean that expertise needed to develop evidence based policy simply won't be there, and this includes the necessary involvement of service users in planning, commissioning etc.

## **2 Programme Objectives**

Here we would like to support Cymorth's members' views in relation to specialist services for people with learning disabilities and older people and the need for these to be perceived as part of the core purpose of the programme in terms of preventing homelessness. Interim findings from Welsh Government's own learning disability transformation programme highlight the need for awareness, recognition and support for people with learning disabilities who are at risk of experiencing homelessness. For example, the link between autism and homelessness has been documented by Shelter Cymru<sup>2</sup>.