
Introduction:

As requested, this document acts as a summary of the oral evidence that The Salvation Army will provide to the Equalities, Local Government and Communities Committee's inquiry into rough sleeping in Wales. This information builds on the Committee's recent visit to The Salvation Army's Ty Gobaith Lifehouse in Cardiff.

This information is included in response to the inquiry's terms of reference, as set out below:

- The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping.
- The scale of rough sleeping in Wales and the adequacy of data.
- The causes of rough sleeping and of the apparent recent increases in rough sleeping.
- The effectiveness and availability of services including emergency accommodation.
- The steps to prevent and tackle rough sleeping in Wales.

The effectiveness of Part 2 of the Housing (Wales) Act in preventing rough sleeping:

The Salvation Army believes that there are encouraging signs that Part 2 of the Housing (Wales) Act is beginning to have a positive impact on overall levels of homelessness in Wales. However, we harbour concerns that Part 2 of the Act is more successful at preventing the homelessness of certain groups than others. Since the Act's introduction in 2015, incidences of rough sleeping in Wales have increased year on year. This suggests that there are an increasing number of people who, for whatever reason, remain unable to access any kind of support to help prevent their homelessness.

A series of possible explanations have been offered for this trend, including the Act's uneven implementation across local authorities in Wales, as well as demographic changes including an increase in homeless EEA nationals. The Salvation Army's experience suggests that although the Act has broadened the level of support available, this does not necessarily mean that this support is more accessible. The issue of access is particularly pronounced amongst certain demographics. For example, evidence from our services suggests that the main beneficiaries of Part 2 of the Act appear to be women. This implies that there are specific barriers to men with experience of rough sleeping, as well as multiple and complex needs, engaging with the preventative support on offer.

The work of our outreach services demonstrates the importance of improving accessibility to support for people with experience of rough sleeping. As many of our project workers will attest, the majority of individuals sleeping rough have lost all trust in public services and are extremely reluctant to engage with what they see as a foreign process, which takes too long and is not conducive to their needs. As a result, a significant aspect of our outreach work stems from our efforts to get people into a position where they are prepared to reengage with services of all kinds. The Salvation Army Bus Project has a 98% success rate in getting people who are rough sleeping into temporary accommodation and access to the various health services they require. Crucially, the Bus Project is offered on an open access basis, meaning that people can access the support they require irrespective of their circumstances. This 'unconditional front door' is vital to the project's success.

To improve the effectiveness of Part 2 of the Act in preventing rough sleeping, The Salvation Army encourages the Committee to further investigate the link between effective outreach work and the improved take up of statutory services by people with multiple and complex needs. This will provide the Committee with an improved understanding of the extensive work that often needs to occur before people are in a position to access the support to which they are entitled.

The scale of rough sleeping in Wales and the adequacy of data:

As part of the Welsh Government's latest statistical release, it is acknowledged that “*there are significant limitations to the use of a single-night count in providing an accurate picture of the number of rough sleepers across Wales.*” The definition of a rough sleeper used for the purposes of the count also suffers from important limitations. In defining rough sleepers as persons “*who are sleeping overnight in the open air (such as shop doorways, bus shelters or parks) or in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks)*”,¹ the definition excludes certain small but statistically significant groups, such as those engaging in sex work who may stay overnight, rather than sleep on the streets. As a result, The Salvation Army suspects that although the official Rough Sleeping statistics in Wales show a rise in the number of rough sleepers in recent years, this is likely to represent an underestimate.

To overcome these limitations, The Salvation Army believes that the Welsh Government should continue working with third sector organisations to share data. This will provide a more comprehensive and continuous figure, helping to identify and understand current and emerging trends that a count/estimate, which occurs once a year, will be incapable of capturing. The Welsh Government should also investigate models of best practice, including the Combined Homelessness and Information Network (CHAIN) in London,² to assess the feasibility of implementing something similar in areas of high demand like Cardiff. CHAIN is a multi-agency database funded by the Greater London Authority and administered by St Mungo's. Reports from the system are used by a range of stakeholders, including commissioning bodies to assess services' effectiveness, and at a more strategic level by policy makers to gather intelligence about trends within the rough sleeping population and to identify emerging needs.

As for wider data sources, The Salvation Army believes that the information being collected around wider aspects of homelessness policy, such as Part 2 of the Housing (Wales) Act, are making good progress. Yet, we remain concerned that not enough exposure is provided to certain groups within these statistical returns. For instance, little has been made of those households who are judged to be legally homeless, but who do not record a successful outcome under prevention and relief and are then deemed non-priority cases ineligible for the full housing duty under Section 75 of the Act. In 2016/17, this group numbered 1,233 households. This is significant because The Salvation Army suspects that most of this group will be single homeless people who are likely to end up rough sleeping once they've dropped out of the system.

The causes of rough sleeping and of the apparent recent increases in rough sleeping:

From The Salvation Army's experience of working in Wales, there appears to be no single, easily identifiable reason for the recent increase in rough sleeping. While things like welfare reform and a lack of suitable housing will certainly have played a part, many of the issues that contribute to homelessness, and rough sleeping in particular, often begin at a very young age - i.e. adverse childhood experiences. It is, therefore, vital that services working with people with experience of rough sleeping are tailored towards these kinds of needs and experiences. The Salvation Army understands that the Welsh Government is supportive of this kind of approach and has commissioned a training programme around Psychologically Informed Environments (PIE) and Trauma Informed Care, to be delivered by Cymorth Cymru. This represents a positive step and the outcomes of this training programme should be monitored closely for future learning.

It should, however, be noted that, as a whole, the homelessness and supported housing sector has been subjected to significant levels of instability in recent years. This has had a direct impact on the levels of rough sleeping in Wales. When the Commission visited with The Salvation in January of this year, a series of examples were discussed where people had committed crimes with the express intention of being sent to prison. Disturbingly, these individuals believed that their chances of receiving accommodation and support were higher in prison than if they remained on the streets. Yet, once an individual was released,

¹ <http://gov.wales/docs/statistics/2018/180201-national-rough-sleeper-count-november-2017-en.pdf>

² <https://www.mungos.org/work-with-us/chain/>

this offer of support would come to an end and they would be left with little option, but to return to the streets. These gaps in service provision must be investigated further, with particular reference to prison leavers who are no longer considered to be in priority need of support by virtue of their time in custody.

The effectiveness and availability of services including emergency accommodation:

The Salvation Army believes that the vast majority of services in Wales are doing an excellent job in difficult circumstances. Much of the positive work that occurs across Salvation Army services in Wales is down to our person-centred approach, including our commitment to work with people for as long as it takes to resolve their issues. This long term commitment is vitally important in our work with people with experience of rough sleeping, as well as those with multiple and complex needs, whose problems will often have developed over many years.

This approach is in stark contrast to the way in which support services are currently commissioned. As services are regularly commissioned on a short-term basis, the homelessness and supported housing sector is continuously under threat of cuts and change. This lack of stability can make it difficult for providers to invest in their services, with Boards unwilling to spend significant sums on projects that may not exist in a year's time. In addition, under a system that encourages competitive tendering, support contracts regularly stipulate the need for cost savings. This can affect levels of staffing and leaves services unable to cope with both the rising levels of demand and the increasing complexity of individuals' needs.

This short-term approach is likely to be exacerbated by the UK government's proposed reform of the funding system for 'short-term' supported housing, defined as any service aiming to accommodate people for up to two years. Under Westminster's current proposal, funding for housing costs (core rent and service charges) will be removed from the social security system and allocated to local authorities to administer on a discretionary, short-term basis via a cash limited grant. In creating a system for the funding of housing costs that mimics the current commissioning process for support contracts, The Salvation Army believes that this proposal will only increase the level of instability faced by residents and providers. This proposed reform should be challenged at every possible opportunity and The Salvation Army will do everything possible to support the Welsh Government in this endeavour.

The steps to prevent and tackle rough sleeping in Wales:

Besides the specific steps suggested during our previous answers, The Salvation Army believes that greater overall stability is required if further steps are to be taken to tackle rough sleeping in Wales. If we accept that the reasons for the rise in rough sleeping are multifaceted and that the needs of individuals are becoming increasingly complex, posing lasting challenges to their wellbeing, then it is imperative that we create an environment that is capable of supporting people in the long-term. Unfortunately, we believe that the contradiction between the long-term needs of many of those who find themselves rough sleeping and the short-term nature of the current commissioning cycle is antithetical to this aim. It is vital that the Welsh Government shows leadership in resolving this tension.

Given the potential impact of universal credit on levels of rough sleeping, The Salvation Army is also keen for the Welsh Government to explore potential legislative amendments, similar to those introduced by the Scottish Government. For example, under the Universal Credit (Claims and Payments) (Scotland) Amendment Regulations 2017, it will be much easier for claimants in Scotland to request twice-monthly payments, rather than monthly payments, and to have some payments made directly to persons to whom rent and services charges are due.³ This would help to ensure that claimants' finances are more secure and that they are able to focus on gaining access to the support to which they are entitled to help resolve their homelessness.

³ <http://www.legislation.gov.uk/ssi/2017/436/made>



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