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and Planning

Ysgol Daearyddiaeth
a Chynllunio

HO 01

Diweddariad ar bolisïau a chamau sy'n
cael eu cymryd i roi terfyn ar ddigartrefedd
Update on policies and actions to end homelessness
Ymateb gan: Dr Peter K. Mackie,
Darllenyydd, Ysgol Daearyddiaeth a
Chynllunio, Prifysgol Caerdydd
Response from: Dr Peter K. Mackie,
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16th February 2022

Re: Local Government and Housing Committee Priorities for the sixth Senedd

Dear John,

It is once again reassuring to see that housing, and homelessness in particular, remain a priority for scrutiny by the Local Government and Housing Committee. It is also reassuring to see such continuity in the Senedd and across the Committee; this ensures we build on our successes in Wales and learn from the more challenging moments. I welcome the opportunity to respond to your letter inviting views on the current homelessness situation and to suggest specific issues on which the Committee might focus its forthcoming work on homelessness and rough sleeping. It is worth noting that my comments reflect my own personal views and not those of my organisation. I think it's also important to note that the leadership and progress in seeking to end homelessness in Wales has been outstanding. Please take all comments below in this light.

I have been involved in homelessness research and policy development in Wales since 2007 and have witnessed incredible and largely positive changes, albeit in the majority of that period Wales has been hampered by the challenges associated with reserved welfare policies, particularly the freeze on LHA rates, the shared room rate for under 35s, and sanctions. I outline below my key reflections which I hope may guide the Committee.

After the initial wave of the pandemic, I co-authored a report comparing the GB responses to homelessness¹ and we concluded that the response in Wales had been largely positive and had saved lives. Empirical data supports these claims too². It seems the commitment to accommodating everyone in Wales largely persists, particularly when compared to England, but the reliance on particular forms of temporary accommodation and the lack of supply, is causing huge difficulties for local authorities to meet needs and demands. Reversing trends in rough sleeping requires similar levels of investment, a supply of suitable accommodation, and truly assertive outreach by a co-ordinated group of services.

My specific comments/responses relate mostly to the Homelessness Action Plan.

¹ https://housingevidence.ac.uk/wp-content/uploads/2021/02/12544_UoG_CaCHE_Covid_Homelessness_Report-Final.pdf

² <https://ijpds.org/article/view/1695>

1. Prioritise upstream prevention

The Homelessness Action Plan places considerable importance on the prevention of homelessness at the earliest opportunity. It is wonderful to see homelessness prevention given such prominence in the Action Plan and this reflects the direction provided by the Homelessness Action Group. Only if upstream prevention is successful will we see measurable reductions in the number of people requiring assistance from local authority homelessness teams at point of crisis. Whilst upstream³ prevention is given prominence in the 'prevention' actions of the Plan, I feel this is an area that requires considerable scrutiny.

For example, Welsh Government invested £3.7m in the Youth Support Grant to support early identification activity. What have been the impacts of this spend? What early intervention mechanisms have been developed and what learning has been shared across Wales to avoid a postcode lottery for young people? This is particularly important as well-evidenced interventions such as the Geelong Project have been rejected in favour of the current and planned Welsh Government approach.

Similarly, Welsh Government is committing to a no discharge into homelessness policy from public services. Whilst this is a fantastic ambition, the discharge of people from prisons into homelessness is a persistent large-scale issue in Wales. Current pathways are not being adhered to and the plans to 'develop, revise, or improve' the existing pathway would benefit from scrutiny by this committee. Radical change is required in practice and implementation, not only in policy. Of course, any amendment to Priority Need would have implications here.

2. Legislative reform

I look forward to the ambitious Green Paper. The key considerations identified in the Action Plan are comprehensive. Many of these areas were explored in the review of Priority Need which I led immediately prior to the onset of Covid-19. Whilst the economic modelling will be of little use now, the extensive qualitative information in this report, from a very wide range of stakeholders, will provide useful direction on potential future options. I agree entirely with the areas identified for consideration. I would also propose that consideration is given to opportunities for legal challenge. Furthermore, the Green paper should consider the 'reasonable steps' component of the existing legislation. I led the research that preceded the introduction of this keystone to the current legislation and it has been disappointing to see the limited steps undertaken by some local authorities. This is not in keeping with the spirit of the law. It is likely that the Welsh Government decision not to specify required reasonable steps on the face of the legislation, and the ambiguities within the statutory guidance etc, may be impacting on the intended implementation of reasonable steps. Notably, the Public Service Ombudsman's own investigation did not consider or identify issues with the administration of reasonable steps. A current Cardiff University PhD student (Kevin Williams) has been examining this specific issue and would be able to make a useful contribution here.

3. Scrutiny of homelessness services and performance against the Action Plan goals

Those working in the sector know that I have long advocated for some form of ombudsperson, regulator, or commissioner, with sufficient powers to scrutinise implementation of homelessness legislation and services in Wales. In Scotland the regulator plays a key role. The recent Ombudsman's report also made similar recommendations. Whilst Covid-19 has

³ See Fitzpatrick et al (2021) for the homelessness prevention typology used by the Homelessness Action Group: <https://ojs.lib.uwo.ca/index.php/ijoh/article/view/13341>

increased Welsh Government scrutiny of local authority homelessness services, there is a need for some form of commissioner or regulator. The need is likely to become even greater as homelessness intervention moves upstream and expectations and scrutiny are laid upon other areas of public service e.g. social care, education, health, criminal justice etc.

4. Evidence and data

It will come as no surprise that an academic should comment on evidence and data. There is no commitment within the Homelessness Action Plan to rigorous evaluation. There is a drive in homelessness research to improve the evidence base, including the use of trial-based methodologies which has been incredibly rare in UK homelessness research. However, for these to be effective they must be integrated with interventions and funded appropriately – in line with health models.

I would be happy to clarify any comments and contribute to any further discussions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Mackie'.

Dr. Peter K. Mackie

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<https://www.cardiff.ac.uk/people/view/363257-mackie-peter>