

Number: WG30911



Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation – summary of response

Supporting People Programme Guidance

March 2018

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Introduction

The Supporting People Guidance was developed in 2012 and revised in 2013 following a recommendation from Sir Mansell Aylward to merge two funding streams and create the Supporting People Programme Grant (SPPG). However, due to changes in legislation as well as other areas it was agreed with stakeholders this was the time to consider new guidance which better reflected a person centred approach, provided clarity on a number of issues, and was more in line with the legislative picture in Wales. The draft guidance which was consulted on was developed with a range of stakeholders, primarily through the Governance workgroup.

The purpose of the consultation was to gather views and feedback on the proposed revised guidance.

Consultation

The consultation period ran from 15 May 2017 to 4 August 2017. Online versions of the consultation document and response forms were provided in English and Welsh. 10 questions were asked within the document and 58 responses were received, however not all questions were answered by all respondents. The list of respondents is shown below and includes responses from local authorities, third sector organisations and umbrella organisations.

Additionally a workshop took place during the consultation and this document also includes responses and comments from discussions during those workshops.

Respondents

Respondents to consultation document	
Swansea Women's Aid Pembrokeshire Care Society Age Cymru City and County of Swansea Barnardos Mirus Wales Cadwyn Blaenau Gwent County Borough Council The Wallich Association of Voluntary Organisations in Wrexham The Salvation Army Clwyd Alyn Regional Development Co-ordinator Gwent Community Housing Cymru Isle of Anglesey County Council Welsh Women's Aid Regional Development Co-ordinator Vale and Cardiff Wrexham County Borough Council Trivallis	The Chartered Institute of Housing Cymru Welsh Local Government Association Merthyr County Borough Council Carmarthenshire County Council Conwy County Borough Council Tai Pawb Information Commissioners Office Cwm Taf Regional Collaborative Committee Cardiff Third Sector Council Shelter Cymru National Offender Management Service Torfaen Supporting People Local Planning Group Cymorth Cymru Torfaen and Blaenau Gwent Mind Social Care Wales Older People's Commissioner for Wales Rhondda Cynon Taf Supporting People providers Hafod Care Powys County Council

Gwynedd County Council Drive Action for Children Llamau Monmouthshire County Council	Cwm Taf Newport City Homes Housing Association Nigel Stannard The Hollies Wales and West Housing Association
We received 10 responses from people/organisations who wished to remain anonymous	
Workshop attendees	
Newport City Council Torfaen County Borough Council Gwent Supporting People Merthyr Tydfil Housing Association Monmouthshire County Council Rhondda Cynon Taf County Borough Council Vale and Cardiff Regional Collaborative Committee Vale of Glamorgan Council Tai Pawb Hafal Denbighshire County Council Cwm Taf Supporting People Merthyr Tydfil County Borough Council Llamau	Hafan Cymru Caerphilly County Borough Council Cymorth Cymru Torfaen & Blaenau Gwent Mind Welsh Women's Aid Carmarthenshire County Council Ceredigion Supporting People Team Digartref Cyf Wales and West Housing Cartrefi Conwy Wrexham County Borough Council Mid-Wales Housing Association CAIS Llamau Blaenau Gwent Supporting People Team

This document summarises the key responses to the consultation questions. There will need to be a more substantial consideration of the responses given, which will form part of the further development of the Supporting People Guidance. Where possible similar comments have not been repeated and have only been included under one question, however there are a number of key themes suggested below which highlight where similar comments were received.

It should be noted that although there were yes/no questions provided frequently responders did not provide a yes/no answer but did provide a narrative. Some of the responses received did not focus on the questions, but responded more generally on the Supporting People Programme (SPP) and/or the guidance. As had been expected, the responses demonstrate not only the diversity of the SPP and its stakeholders, but also the passion stakeholders have in helping to shape the future. This summary will not try to respond to the comments provided, simply to summarise the key themes emerging in response to each question.

Additionally the comments gained from the consultation event have been added when they were not covered by consultation responses.

Key themes

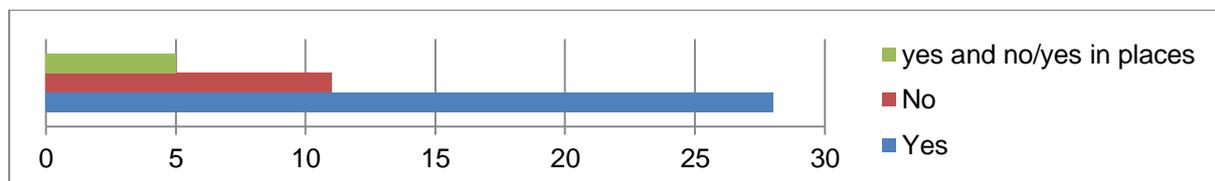
There were a number of key themes to the responses received and these are summarised below.

- Eligibility – for those who do not have recourse to public funds is not clear enough.
- The term ‘Local Connection’ – further clarity required to ensure consistency of application.
- Short term interventions – whilst an emphasis on short term interventions was generally welcomed, further clarity was sought around what this means, what timeframe does it cover and how can it be evidenced.
- Equality -The requirement to complete an Equality Impact Assessment for funding decisions made was generally welcomed, but some felt that the guidance could go further in its consideration of and promotion of the Equalities Act 2010.
- There are concerns around varying procurement practices across Wales, the need to have consistency with EU procurement regulations, and guidance which provides local authorities with the tools they need to procure/commission services as needed, and with consistency.
- Several comments noted the limitations of annual budgets and suggested a move to 3 yearly budgets.
- Guidance to set out how the Regional Collaborative Committees (RCCs) will link with/report to the Public Service Boards. Also the Welsh Government need to take a stronger role in ensuring the RCCs are encouraging innovation and doing what they were set up to do.
- The need to consider how future commissioning would be ‘harmonised’ with new duties under other Acts including Well-Being of Future Generations (Wales) Act 2015, Part 2 of the Housing (Wales) Act 2014, the Social Services and Well-being (Wales) Act 2014 as well as the Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015. However, further to this there was some concern about the ability of Supporting People teams to respond to an increasingly large list of duties under each of the Acts, and any new Acts that may come up in the future.

Responses to individual consultation questions

1. Is the draft Guidance appropriately person centred and is the eligibility criteria clear? Please give a reason for your response.

Of the responses received, 28 people responded positively, 11 negatively and 5 either yes and no or yes and no in places.



Most respondents agreed that that the guidance is person centred and the eligibility criteria is clear, however a number of suggestions and common themes for improvement and where further clarity is required were put forward; particularly around eligibility to public funding and the ‘no local connection’ criteria.

Key comments/suggested improvements made:

- The guidance would be more appropriately person-centred if it were to emphasise the need to find out and deliver what matters to each vulnerable individual as laid down in the Social Services and Well-being Act 2014 with consequential outcomes to measure impact.
- It was commented that the term 'local connection' eligibility criteria is interpreted differently in different local authorities depending on the commissioning team. Guidance on this matter needs to be clearer to avoid local authorities differing from one county to the next. In particular a concern was raised for those who were asylum seekers or victims of domestic abuse. One respondent said that the local connection criteria is not appropriate for refuge-based support services and other VAWDASV accommodation services. Others also questioned whether local connection rules apply to the SPP.
- At 2.5 the draft guidance states 'Any person in need of housing support is eligible to receive housing support as long as they are eligible to receive public funding'. It was noted that this statement was not included in the previous guidance document and a significant number of responses requested guidance/clarity on what this means and how to help those with no recourse to public funds, e.g. those entering domestic abuse services, asylum seekers and rough sleeping. Welsh Women's Aid (WWA) commented that they strongly oppose the statement that SPPG is a 'public fund' under immigration rules.
- Further clarity was sought around eligibility for care leavers, children and young people, people with complex needs, asylum seekers, older people who are not in receipt of benefits, people who are registered under section 117 of the Mental Health Act, and follow up support for those exiting services.
- Clarity and/or definitions required of the following terms: Emotional support; care or domestic assistant services; special activities; and housing management tasks (how this differs to housing related support).
- There were conflicting opinions amongst respondents with regards to the emphasis in the guidance on short term interventions. Whilst it was generally seen as a positive to recognise the value of short term interventions, there is concern that the need for medium to long term services, especially in relation to young people will not be recognised. Llamau also commented that they are concerned that the drive to shorter length support could create a "revolving door". Further clarity was also sought around what is a 'short term intervention', what timeframe does it cover and how will service providers show what has been done/achieved by the client.
- There were concerns about the absence of guidance on older people and learning disabilities; respondents suggested there should be more detail about how this element of SPP can be managed. Some felt that there seemed to be an implication that individuals with a learning disability or older people will not be covered by the programme in the future particularly if the individual is accommodation based.
- There was general support for the commitment to encouraging service user engagement. However, there were concerns of how this can be funded and what training and guidance may be available to providers to help with the practicalities of implementing this. Further there were comments around the need for service users to sit on, or be more involved with Regional Collaborative Committees (RCCs) and Supporting People National Advisory Board (SPNAB). WWA commented that there needs to be clear guidance on the requirements and expectations on local authorities and RCCs to address barriers to service user involvement with commission and developing services.

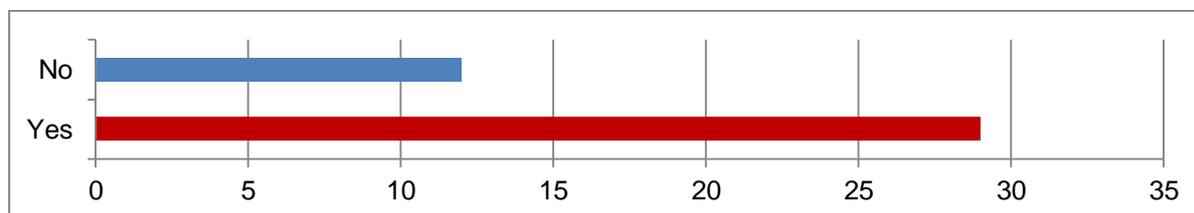
- A number of responses agreed with ‘skills, training and employment’ being included under what can be eligible for funding within a SPPG service (ref 2.6.5). It was suggested that this should also include volunteering.
- The guidance makes reference to Gateways but does not stipulate if these can be funded through the grant.
- It was suggested that eligibility needs to be expanded to include not only those who are deemed ‘in need’, but also those ‘at risk of being in need’. Another commented that eligibility for services should be based on ‘assessed’ need, not just need, for housing-related support. However, a concern was raised that if support is prioritised on need it may undermine the preventative approach and lead to a focus on those in crisis.
- Several respondents suggested that the document should be reviewed to ensure that the terminology used is tenure neutral i.e. to incorporate owner occupiers and others who may not hold a tenancy e.g. caravan dwellers etc.

Consultation event comments

- Poverty Action Group and homelessness links could be clearer.
- Could there be an outcome around how Supporting People has prevented Statutory Duty?

2. Does the draft Guidance have a positive impact on equality across service development and commissioning? If not why not

Of the responses received 29 people responded positively and 12 negatively.



Over half of respondents agreed that the guidance has a positive impact on equality across service development and commissioning, and welcomed in particular the inclusion of the requirements for funding decisions to have to undergo an Equality Impact Assessment. However, a number of respondents felt that the guidance needs to be strengthened with following key themes highlighted:

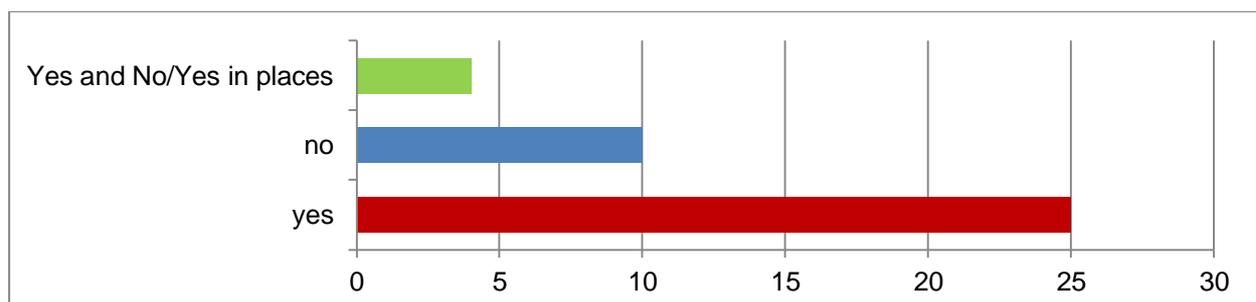
- There were concerns around the costs and arrangements for translation and interpretation, not just between English and Welsh but a number of other languages to enable people to communicate and access support services.
- Swansea Council commented that domestic abuse impacts on men and women, however many domestic abuse services are still focused only on women’s services. Perhaps there needs to be specific reference in the guidance to gender neutrality in ensuring services are available in an area.
- Many welcomed the requirement of Equality Impact Assessments (EIAs), but were concerned around them being completed appropriately and effectively, therefore more guidance around this would be useful. Further, one respondent said that the guidance makes little reference to equalities or the Equalities Act 2010 and that EIAs

should be expanded to more areas e.g. for proposed new developments, re-modelling, downsizing or merging of services.

- Cardiff Third Sector Council commented that the draft guidance does make a positive impact on equality but it could be more robust. For example, the specific roles of the bodies or personnel in the guidance do not make reference to maintaining oversight of the need to ensure equality and diversity or consistency of delivery against the values stated at page 9 (1.3).
- A number of respondents highlighted a gap in the lack of detail or reference in the guidance to the following client categories: older people; people with learning disabilities whom need long term support; and Black and Minority Ethnic (BME), Lesbian Gay Bisexual and Trans (LGB&T) individual and communities, and people wishing to enter full time employment, who may be unable to move on into private tenancies immediately.
- Several responses highlighted the need for more information and guidance around engaging with and developing services for hard to reach and marginalised groups, and would welcome a more joined up approach in respect of links with other Welsh Government policies and legislation linked with opportunities for joint commissioning arrangements and service developments. It was suggested that some models of good practice included within the document would be helpful to understand how other local authorities have implemented a joined up approach to the delivery of equitable services.
- The guidance provides a framework and an overview of the principles of good practice when commissioning services which promotes equality, but several concerns were raised about how it corresponds with local authority procurement rules and processes. For example, the requirement that the impact of services users should be considered in re-tendering arrangements.
- A number of respondents referred again to the inclusion of the eligibility criteria of eligible 'public funding and local connection' as they may disadvantage some vulnerable groups. With one respondent seeking reassurance that the criteria had been properly EIAd before reference is included as part of the eligibility criteria.
- Cardiff Third Sector Council commented that there is nothing explicitly in the guidance about those who are cognitively impaired and are unable to take part in staff recruitment, for example those with severe learning disabilities or those living with dementia (ref 2.2.1).

3. Does the draft Guidance provide a clear commissioning framework for Supporting People commissioners and service providers? Please give a reason for your response

Of the responses received 25 people responded positively, 10 negatively and 4 replied with Yes & No or Yes in places.



Whilst most responses agreed that it does provide a clear framework for commissioners and service providers, some said that it was open to interpretation and contained contradictions in advice throughout, particularly around retendering, de-commissioning of services and the responsibilities of different roles/bodies. It was also felt that the framework will not be applied consistently by commissioners and sought assurance around what measures will be put in place by Welsh Government to ensure it is consistently applied.

Key comments/ suggested improvements made:

- It would be useful to have a national procurement strategy to help with consistency across LAs and for large scale providers working in several areas.
- The guidance does not fully emphasise that local authorities have to adhere to their own Contract Procurement Rules and Procedures which needs to be reflected in the guidance. It is also not clear in the guidance that EU Procurement rules still apply.
- The guidance contradicts itself about strategic reviews and further guidance/ clarification is required of when a strategic review is required and when this would lead to a re-tendering exercise, what a strategic review should look like and a standard template for completion would be useful to ensure consistency across local authorities.
- Concerns around paragraph 4.10 and charging of services being at the discretion of the local authority. Some felt that this should be removed from the guidance and that services should not be chargeable. Action for Children would completely disagree with any proposals to charge for SP services.
- Cymorth Cymru raised a concern around 4.8.1, the section on Developing Regional Services and Consortia, and said that the guidance needs to be very clear about the drawbacks of consortia working as well as the potential benefits.
- WWA highlighted that WWA and VAWDASV specialist services across Wales have contributed to the production of commissioning toolkit that has been supported by the Welsh Government. Further to this the Welsh Government is producing statutory commissioning guidance for VAWDASV; this will need to be adhered to by public bodies including local authorities as part of their duties under the VAWDASV (Wales) Act 2015. WWA recommended that the commissioning framework needs to include specific instruction to RCC and local authorities to adhere to the VAWDASV commissioning toolkit and accompanying statutory guidance once it is published.
- The SPPG guidance suggests collaboration across strategic themes in regards to commissioning, however it fails to recognise VAWDASV as one of the strategic themes.

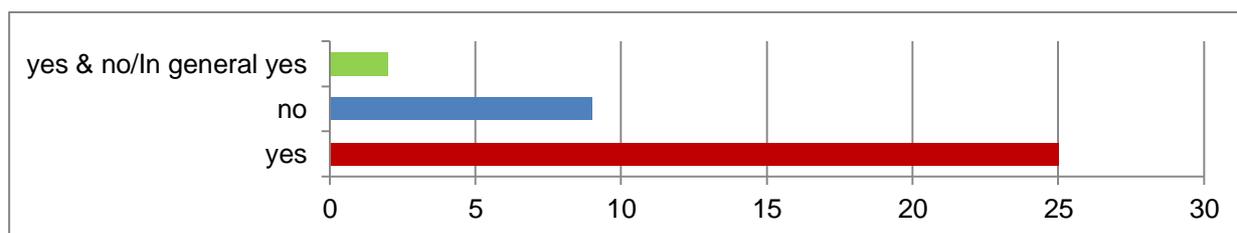
Consultation event comments

- Although the framework is clear will it be used by LAs due to differences in procurement practices?
- When does the 'super specialist' (for intense services) be the 'specialist' and others just the norm – everyone dealing with complex cases?
- If services are regularly retendered it can cause de-stabilisation but differences across LAs may mean the 'competition' to run services is unbalanced in favour of those larger providers. Also that some LAs may be retendering and therefore services are 'up for grabs' but others are not which means some providers could lose contracts without the ability to apply for others.
- Could WG get all procurement teams together and agree a common way forward?

- Consortia element not always positive – tends to privilege large organisations and could lose smaller specialisms and increase risks if you end up with 1 or 2 large organisations that may fail rather than more smaller orgs to spread the risk. Consortia can be very time consuming to set up and not enough time to do this effectively with short LA tendering periods.

4. Is the draft Guidance flexible enough to encourage innovation and make the most effective use of the Supporting People budget? Please give a reason for your response

Of the responses received 25 people responded positively, 9 negatively and 2 Yes & No/In general yes.



Generally respondents agreed that the guidance is flexible for local authorities to commission innovative services whilst making best use of the SP budget, particularly around the reduction in the need for support plans for short term interventions. However, not all agreed and the following key comments/suggested improvements were made:

- Annual budget cycles make it difficult for LAs to plan. Many would like to see longer term budget setting (3 years) to support longer term planning of services and provide increased stability and certainty to the sector.
- There were concerns around the re-categorisation of floating and fixed support to reactive and preventative as it was felt it could lead to confusion about the way these services complement one another but may also be at odds with the wider move towards early intervention approaches in Wales. Also there is fixed support that provides preventative services, and floating support that can be reactive. Most advised that the terms floating and fixed should be retained.
- The guidance needs to provide greater clarity on how the fund can be used to deliver services outside of the usual housing and support setting but still comply with the eligibility criteria set-out in the guidance.
- The guidance promotes and allows flexibility in how services are developed and delivered. For example, the Housing First approach - the guidance should demonstrate how SP funded services link in and compliment such approaches.
- There is a lot of bureaucracy surrounding the SP Programme which can stifle innovation. Bureaucracy could be reduced by the introduction of a national SP database.
- Innovation can be improved by further engaging with service users and providers in relation to service planning and development, including contributing to service specifications, Needs Mapping Events.
- A clearer focus on flexibility and innovation within the framework is needed that ensures prevention work is true prevention work, and not just intervention at the point of crisis. Innovation must focus on earlier intervention. Another respondent commented that they would like to see more emphasis on prevention services and

services that work with specific client groups and those that work with people with multiple and complex support needs.

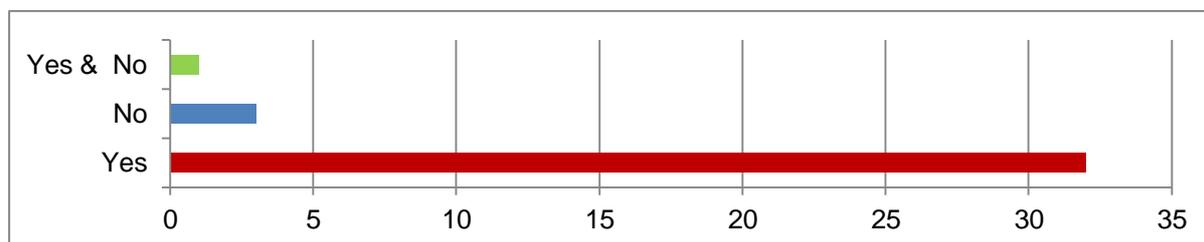
- It was suggested that that the language used in the guidance needs to be strengthened so that innovation is seen as a key feature of delivering the SPP effectively, rather than an additional extra or 'nice to have'. Furthermore, the guidance needs to be more explicit in encouraging new and different ways of working across commissioning pathways, towards achieving a more integrated approach for service users and best practice innovation.
- Whilst some welcomed the reduction in the need for support plans for short term interventions, with the third sector stating that this 'would speed things up' leaving more time to spend with the client. The WWA highlighted that it is important to assure that this change does not lead to a lack of assessment altogether and that opportunities for disclosure of VAWDASV, both within the specialist sector and within the wider housing sector, are not reduced. Others said that even short term interventions need an element of planning even if this does not require a long term traditional type of support plan. Blaenau Gwent CBC said that there is still a need to evidence this work and this can be captured on the outcomes data and by using local monitoring systems. The Personal Housing Plan may not always be an appropriate option to record this data as it will depend on the service being delivered.
- WWA raised a concern regarding the development of regional services and consortia as possibly posing a threat to specialist expertise in smaller organisations.
- The language of the document tends towards a traditional approach to funding, review and monitoring that does not demonstrate how innovation will actively be supported within the framework e.g. the use of funding for pilot projects.
- The section on 'support by demand' (p36) doesn't explain what this is, nor does it show full understanding of the concept. For instance, there needs to be an understanding of unnecessary and avoidable demand caused by a failure to provide the right response first time. There also needs to be an understanding of hidden demand and how to identify it. Further, one respondent said that wording used in the guidance could eliminate and create barriers for some of the most vulnerable people who would not come forward to seek the support, they may not acknowledge or accept they need support or may have other barriers to prevent them doing this, until crisis point.
- Local authorities felt that the guidance was flexible enough to encourage innovation but less monitoring from the centre would further facilitate this.

Consultation event comments

- Need to be mindful that you can be innovative but WG need to recognise where this has happened as the outcomes may be different.
- Less monitoring from WG would be welcome – it stifles innovation.

5. Do you agree that the draft Guidance strengthens the governance arrangements of the Regional Collaborative Committees (RCCs) (e.g. Regional Partnership Boards)? If not, please explain why

Of the responses received 32 people responded positively, 3 negatively and 1 Yes & No.



A majority of respondents agreed that the draft guidance does strengthen the governance arrangements of the RCCs but further clarity is required around the links between the RCCs and the Regional Partnership Boards and Public Service Boards. Monitoring the effectiveness of the RCCs was raised as a concern and what mechanisms the Welsh Government are going to put in place to ensure that the RCCs are operating as they should be.

Key comments/areas for improvements put forward:

- Clarity of where the RCCs fit with the Regional Partnership Boards fit and Public Service Boards fit. Specifically around reporting and decision making.
- It would be helpful to understand how these governance arrangements will fit with Welsh Government proposals for local government reform and in particular governance arrangements of regional collaboration though Joint Governance Committees.
- Provider representation with RCCs requires further governance to ensure the views of all providers are fed into the system. It was suggested that a round robin spreadsheet would ensure transparency and ensure all providers who want to contribute had a voice.
- Greater emphasis sought on the role of governance in addressing and mitigating risk. For example, see the governance arrangements in place for Housing Associations across Wales.
- A number of comments were raised about the membership of the RCCs e.g. should include specific reference to Regional Partnership Boards and Public Service Boards, consistent membership of the RCC remains a concern, frequency of meetings, (too few) attendance records and turnover of members, engagement of certain sectors, as well as a thorough knowledge of some of the issues to enable informed contributions to be made.
- There is still ambiguity over the role and responsibilities of the RCC, SP Team and Local Planning Groups.
- The guidance now requires the RCCs to publish key messages from each meeting in addition to the minutes (3.17.4) which the RCCs already publish. It was felt that this would increase the costs attributed to Welsh Language translation for duplicating information that is already contained and published in the minutes.
- More detail could be included about working in partnership with the Voluntary Sector
- RCCs need to be more strategic. Concerned that the involvement of the RCC in the operational management will detract from the strategic focus.

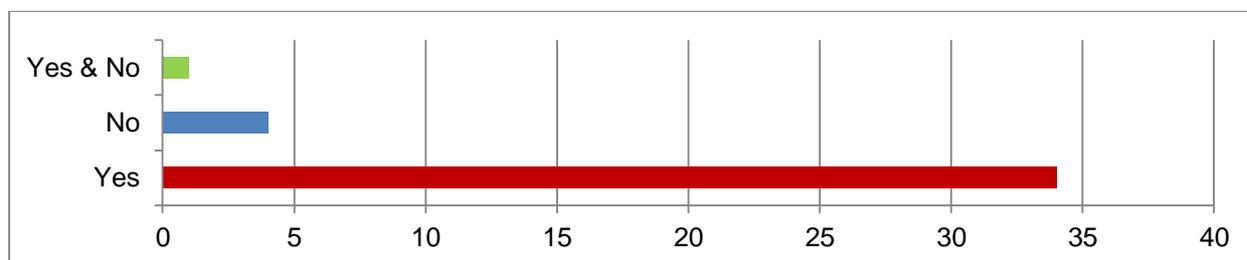
- The link between the Regional Strategic Development Plan (for which the RCC has responsibility) and identified strategic priorities (for which Local Planning Groups have responsibility) remains ambiguous.
- Consideration should be given to how Independent Professional Advocacy is promoted by both SP providers and the RCCs to ensure that people are supported to engage in the governance of SP commissioned services.
- Several respondents commented on the lack of governance/ planning of services role that the RCCs are able to undertake given that SPPG monies are awarded to each local authority not to the region to administer.
- The OPC highlighted that with regards to the RCCs role in involving services users on the Board, (2.3.1 and 3.13.2), engagement with older people should be “expected” rather than just “encouraged”. Engagement should be meaningful and SP providers and LAs should ensure that they are not only seen to interact with older people but actively encourage their participation, adopt an inclusive approach and demonstrate a willingness to change as a result of learning through engagement.

Consultation event comments

- Greater collaboration is a positive
- Nothing in the guidance to suggest moving to regional budgets/pooled resources

6. Is the connection between Supporting People commissioning and Welsh Government legislation clear? Please give a reason for your response

Of the responses received 34 people responded positively, 1 negatively and 4 Yes & No.



Whilst most respondents felt that the guidance provides a clear connection between Supporting People commissioning and Welsh Government legislation some felt that not all relevant legislation had been sufficiently included whilst others were concerned that the priorities of the Supporting People programme is now too wide ranging and is in danger of being overstretched.

Key comments:

- Greater links or emphasise was requested to the following areas:
 - Social Services & Well-being Act 2014
 - Part 2 of the Housing (Wales) Act 2014
 - Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.
 - Well-Being of Future Generations (Wales) Act 2015, particularly in relation to socio economic inequality and the new equalities focus introduced by the Act 2015.

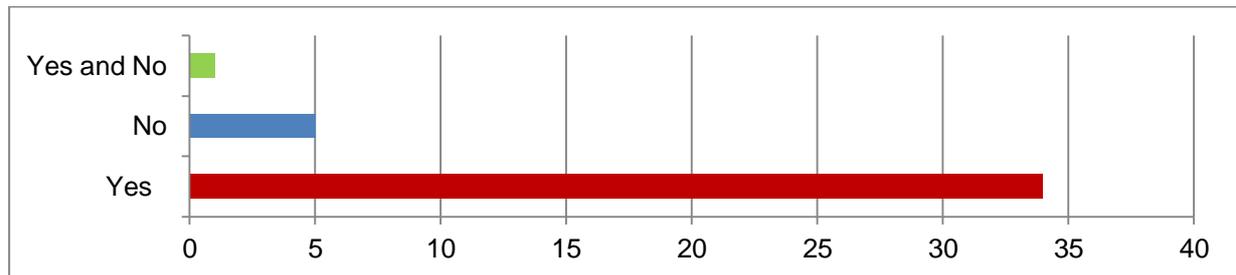
- Welsh Government Framework for Action on Independent Living and the local Ageing Well Plans.
 - New policy drivers for equality and rights based approaches to public service.
 - Links between SP and other tackling poverty groups.
 - Greater alignment with the homelessness grant needed. Commissioning must be aligned with local homelessness strategies.
 - Stronger references throughout the Guidance with health services across Wales and legislation relating to health services.
 - Reference to legislation regarding client groups with protected characteristics i.e. Together for Mental Health etc.
 - The protection of people's Human Rights. The right to respect for private and family life, home and correspondence (Article 8 of European Convention on Human Rights), is of particular relevance to the SP programme.
 - The impact of welfare reform and other developments e.g. Local Housing Allowance cap Supported Accommodation Review, Universal Credit
 - Renting Homes Wales Act 2016 and the supported housing tenancy and role of SP working with landlords/partners on exclusions and extensions to tenancies.
 - Devolved policy on Independent Advocacy
 - The Older People's Commissioner recommended referring to their guidance on Equality and Human Rights Impact Assessments to ensure a greater understanding of people as individuals.
 - Guidance around the alignment of SP with other anti poverty programmes, Families First, Flying Start, and Communities First as sometimes SP is expected to support across a multitude of areas from health, probation, and well-being.
- Several commented that in the various legislations there is very little mention of SP although the Programme seems to be at the centre of all, but that they are still expected to deliver against them e.g. Housing Act, Social Services and Well-being Act, or the Future Generations Act.
 - Need to clarify the actual primary focus of the SP Programme. At present the aims and objectives of the Programme are too wide ranging e.g. homeless prevention, VAWDASV, social care, health, criminal justice, tackling poverty etc. There were concerns that the SP Programme is in danger of being stretched beyond capacity and diluted as it can be expected to respond to a multitude of issues and groups.

Consultation event comments

- Can we make sure language is SP not health (prudent health care)?
- Could be better links and good practice around action other LAs have taken.

7. Is the role of stakeholders clear?

Of the responses received 34 people responded yes, 1 responded yes and no, and 5 responded no.



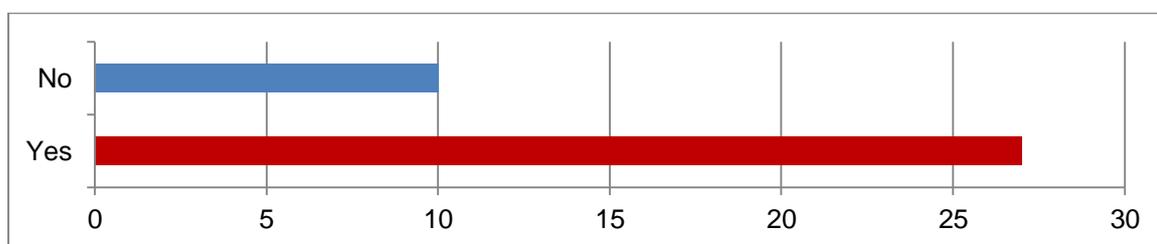
A majority of respondents agreed that the guidance is clear about the role of stakeholders but could be strengthened, with the following key comments/improvements put forward:

- Would welcome further guidance on how joint working and commissioning would be encouraged, monitored and implemented.
- Guidance on how to evidence the reduced demand on other services (1.4.2).
- The process of involving service users should not be one defined solely by the level of involvement in different stages of the delivery and design of services. RCCs should be provided with the flexibility to demonstrate how these opportunities are given and how they have been conceived.
- In regard to de-commissioning, stakeholders should have the opportunity to have their say and therefore should be informed before a final decision is made to allow them to add their voices to the conversation.
- The role of the stakeholder appears in different chapters of the document. It would make the document easier to read and understand if the role of the stakeholder was included in one section only.
- It was suggested that stakeholder membership should be expanded to further incorporate the role of service users. In particular, service users given a greater role in the governance and commissioning processes of SP services.
- The framework does not allow for sufficient co-production; under the representative arrangements it would help if there was a mapping exercise done so it was clear on who was representing who and what was expected of the representative role.
- There needs to be sufficient resources and development of co-production with all stakeholders – should this be included in the RDC's role?
- Clarification required around the funding of service user and stakeholder engagement. E.g. SUs may require support, training to take on an active role in service reviews, remodelling, re-commissioning. Also events, travelling, support all require some element of funding. Clarity needs to be provided as to who is expected to fund these activities otherwise they may not be achievable
- The role of wider stakeholders could be strengthened e.g. Health and Probation.
- It was suggested that the role of the regional provider forums could be highlighted as a separate section within the guidance and the role of RCC provider reps could be incorporated into this section.
- WWA recommended that RCCs engagement with stakeholders should also include engagement with the new regional and local structures being developed regarding VAWDASV, including ensuring strong links with strategic VAWDASV boards.
- It was recommended that RCCs should publish mechanisms for service user engagement on their webpages to ensure that these are widely publicised.

- Further consideration required around the membership of SPNAB and there was felt to be an imbalance of ‘statutory officers’ with people who have lived experience. There should be provision for service users/ people to be able to sit on this board, and other stakeholders, such as suppliers, supporting people workers, representative of Anti-Poverty and Domestic Violence.
- In respect of the RCC membership, it does not mention the Voluntary Sector Representatives.
- The ability for local stakeholders to influence regional initiatives will need to be strengthened.
- One respondent said that it is often difficult to maintain positive operational input from stakeholders. Job roles change frequently and accountability shifts from one person to another within stakeholders groups and the benefit of stakeholder collaboration is lost.

8. Are there sections of the draft guidance that could be strengthened or made easier to use? Please give a reason for your response

Of the responses received, 27 people responded yes and 10 no.



Key suggested improvements made:

- Would welcome a young person friendly or easy read guide to be available.
- More clarity on what is a ‘Specialist’ and what is a ‘Generic’ Support Service.
- Clarity required around how SP funded services will identify the point at which a threat of homelessness is triggered, and the point at which a homelessness duty ends if this is a LA duty.
- Clarification required around void-claw back; different local authorities operate differently – could there be guidance on this area? I.e. what would constitute a reasonable explanation?
- More details required on the content of the LA annual update and regional annual update. Section headings are included in the guidance for the LA annual update but it doesn’t detail what is expected within the sections.
- One respondent raised a concern around the emphasis on the role of service users and how they can or would want to be involved in such areas as commissioning of services. Service user engagement is imperative however needs to be proportionate to the Programme arrangements as consideration needs to be taken around how time intensive this is to continually factor in to all decision making and how this is done (i.e. should be through evaluation and provider as well as face to face/direct consultation activities).
- Guidance required where services are jointly commissioned and what the arrangements are. It was suggested that for jointly commissioned services could there be joint monitoring and review of service provision and cost reviews.

- It would be useful to have a copy of the hierarchy structure for all the meetings that take place, its purpose and who is involved and the outlines of the decision making in these meetings.
- Commissioning and procurement needs to be clarified. One respondent said that it currently gives providers the false hope of services not being routinely tendered where this may have to happen given the Contract Procedure Rules.
- The expectations of Welsh Government need to be more fully explained around regional working, collaborative working and consortia.
- Once the guidance is published, a summary document outlining the changes should be produced and issued to existing providers.
- WWA recommended a strengthening of the links in the guidance to the VAWDASV (Wales) Act 2015 and the National VAWDASV Strategy objectives. Particularly at 4.7 - where they raise a concern about the reference to accommodation based and other support services for domestic abuse as costly options and the suggestion that target hardening can be used where possible to reduce demand on these. They say that this is inaccurate and potentially life threatening.
- Clarity needed around the reasoning and format for quarterly LA reports to RDCs (p25, 13.6.2).
- Further clarity is now needed on the role of the NME within the context of the new guidance if it is to be a meaningful data source.
- It was suggested that if Homelessness Grant and SPPG are to be so collaboratively delivered is there potential to combine the funding streams with one guidance document (p.34).
- Clarity around management charges which are only required to be 'as low as possible'. One respondent would welcome a definition on this point as it was felt that this could be seen as contradictory to the approach advocated toward staff welfare where training, continual personal development and high regard of profession are detailed.
- Access to Independent Professional Advocacy should be promoted to help ensure that all service users, including those hardest to reach, have their voices heard.
- The guidance could be improved by the explicit inclusion of communication with older people, carers, BME and LGB&T forums (3.17).
- Equality is a weak area in the document, concentrating on EIAs, as is the Welsh Language Act and standards and needs a separate section to draw areas and issues together.
- Improved guidance on the delivery of emotional based services would be helpful to the commissioning arrangements for domestic abuse.
- There is no reference to what level pricing benchmarks should be set at. If there is to be consistency then this needs to be included or reference to when a review will take place to be able to continue to use benchmarks previously set.

Consultation event comments

- LCPs – thought this had gone now – local annual update instead?

9. We would like to know your views on the effects that revision of the guidance could have on the Welsh Language, specifically on opportunities for people to use Welsh and on treating the Welsh Language no less favourably than English and:

Please also explain how you believe such revision could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

There was generally a low level of response to these questions; however most of those who responded recognised the importance of providing services in the language of choice, particularly when supporting vulnerable people with complex needs. However, some felt that the guidance could be improved to ensure Welsh language responsibilities are included.

Key comments received have been summarised below.

- Would be positive to see a bilingual version of the support plan and outcomes.
- It would be assumed, as a condition of tender, that all providers will be complying or working towards compliance of the Welsh Standards.
- In areas / region where Welsh Language is less common, provision of a service in Welsh will be more difficult / costly to provide.
- Accommodating the language needs and other cultural barriers faced by minority ethnic individuals and communities must also be considered here.
- It was suggested that the importance of providing services in the Welsh Language to those that want it needs to be made clear in tender documentation.
- There is a clear issue here around how the statutory duties placed upon LAs/ commissioners impact on the requirements placed on providers and the associated cost of delivering a bilingual service.
- Demand for Welsh Language services should be captured within the regional strategic planning and needs assessment processes, and any additional costs should be recognised within the commissioning process and provided as part of the funding settlement to providers.
- The Active Offer needs to be firmly entrenched in this guidance and support for organisations, commissioned by the LA in providing SP services, needs to be factored in to any commissioning
- The revision is an opportunity to ensure that all supporting materials have been designed to be truly bilingual from the start. Advice should be sought on good practice of design e.g. having Welsh and English side by side enables a learner to attempt to complete the form in Welsh and turn for assistance to the English as required.
- The cost of translation services to providers was raised as a concern. Provider organisation may have difficulty in meeting Welsh Language service delivery expectations without some guidance from the WG regarding collaborative approaches etc.
- Providers need clarity around the impact and relevance of the Welsh Language Standards to third sector organisations.

- A few respondents commented that there is no mention of the Welsh language or relevant legislation in the guidance and there is little evidence in the document that the Welsh language was a consideration in the drafting stage.
- The Welsh Language Standards specify that the Welsh language needs to be considered throughout the government's business, in consultation, in research and in policy formulation. There should be a section outlining the Welsh Government's intentions as to how this new guidance would increase people's opportunities to use Welsh and to be treated no less favourably than English.
- There should be a separate section within a larger section on equalities encompassing the Welsh Language Act, the Welsh language standards and how the guidance promotes this policy area.
- It would be helpful for a standard contract/grant funding agreement to be provided to local SP teams in which the Welsh Language provision of services (as and when appropriate) is stipulated.

Comments from consultation event

- How is this passed on to the providers who have no statutory duty?
- Issues much wider than English/Welsh, what about other languages which are far more prevalent in some areas especially around asylum seekers status areas?

10. Do you have any other comments on the draft guidance?

Key comments/suggestions received that have not already been included elsewhere:

- Would be helpful if there was more significant recognition of the impact of Welfare Reform on SP Providers (1.7.1).
- SPP currently focuses heavily on outputs and outcomes. It was recommended that more of an emphasis is given to impacts (e.g. the impact of the Programme on cross-commissioning plans and budgets) and that this is combined with the development of a series of impact measurements, including social return on investment toolkits.
- Data validation: could there be guidance on this area to encourage consistency across regional areas?
- At 4.7 under the heading of Social Services, Health and Well-being lists mental health, physical health and drug and alcohol services, this should also include learning disabilities.
- At 4.11.6 - under role of the provider includes the bullet-point 'Advise the local authority where surpluses are made on contracts'. There is no equivalent for advising if a deficit is being made due to changes in other external factors, such as increases in the living wage. It was felt that this means that there is an unequal relationship between service providers and commissioners.
- Consideration given to the inclusion of a statement for clients which explores the risk of homelessness re-occurring after six months. This would provide a better understanding of how long-term housing solutions actually are and also may provide an opportunity for planning for the future.
- There needs to be clearer guidance upon the requirements of providers to comply with the Financial Conduct Authority's regulations, which is defined by the Financial Services and Markets Act 2000 (FSMA). At present this is proving to be a major barrier for small providers to engage in issues around financial management.

- A reference needed to the requirements of service providers conforming to the requirements of Rent Smart Wales, particularly when dealing with Private Sector Landlords.
- Would like to see membership of the SPNAB include a senior person from Health Services, not just Public Health Wales.
- There is reference throughout the guidance about commissioners using homelessness data and statistics to inform the development of services. However, it was felt by Llamau that the official statistics do not show the true picture, especially in terms of youth homelessness, and depicts a very limited picture of the true scale of the issue.
- Longer term services: It would be useful to get a steer from Welsh Government within the guidance as to how to approach the future commissioning of longer term services. The guidance seems to remain focussed on shorter term interventions to prevent homelessness.
- Clarification required around Early Intervention / Prevention - A person needs to be in need of housing support to be eligible for SP; at what point is prevention of homelessness then a consideration? How can early Intervention, preventing homelessness and the soft outcomes that are vital for prevention and building resilience in people be captured?
- Ref: 1.1.2 – a need to consider Rough Sleeper projects.
- RCC – participation/views of service users – No mention of support/resources to enable providers to break down barriers to enable individuals to take part in a meaningful way. No child care is ever provided on site at service user events – whether by SPNAB, RCCs or local SP Teams.
- A comprehensive IT system to collect all the information required by Welsh Government could be collected centrally freeing up the burden of 22 LAs collecting and forwarding on this information

Concluding Remarks

Overall the feedback to the consultation is broadly positive. However, there are a number of key areas that will need further consideration before a final version of the revised guidance can be agreed.

We would like to thank everyone who has taken the time to respond to this consultation, and attend the workshop. Your views are vital in helping to develop guidance which will both provide clarity, and help to shape the Supporting People programme going forward, and we are very grateful for your contributions.