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Llywodraeth Cymru
Welsh Government

Welsh Government
Consultation Document

Draft Housing Support Grant Practice Guidance

Consultation on draft practice guidance for the Housing Support Grant for local authorities

Date of issue: 7 October 2019
Action required: Responses by 29 November 2019

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

Overview

This consultation is to gather views on the draft Housing Support Grant Practice Guidance

How to respond

The closing date for response is 29 November 2019

This consultation will be for a total of 8 weeks due to the extensive stakeholder engagement already undertaken to co-produce the guidance.

Please respond by completing the online form or completing the questionnaires and sending it to SupportingPeople@gov.wales

Or by post to:

Supporting People Team
Housing Policy
Welsh Government
Rhydycar Business Park
Merthyr Tydfil
CF48 1UZ

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

The consultation document can be accessed from the Welsh Government website at:

<https://gov.wales/draft-housing-support-grant-practice-guidance>

Contact details

For further information:

Supporting People Team
Housing Policy
Welsh Government
Rhydycar Business Park
Merthyr Tydfil
CF48 1UZ

email:
SupportingPeople@gov.wales

General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

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Under the data protection legislation, you have the right:

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- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ

The contact details for the Information Commissioner's Office are:

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01625 545 745 or
0303 123 1113

Website: <https://ico.org.uk/>

e-mail:

Data.ProtectionOfficer@gov.wales

Draft Housing Support Grant Practice Guidance

Consultation on draft Practice Guidance

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1. Introduction

The purpose of this consultation is to seek views on the new draft practice guidance for the Housing Support Grant (HSG), which has been produced by the Welsh Government in partnership with external stakeholders. The guidance sets out the framework in which local authorities should operate and administer the grant.

The HSG, introduced in April 2019, seeks to improve the outcomes of a range of individuals who are amongst the most vulnerable in society through the range of early intervention, prevention and support interventions. The HSG's main purpose will be to address the housing and housing related support needs of those individuals.

In line with expectations of the Well-being of Future Generations (Wales) Act 2015, we fully intend the new grant to be implemented in an involved way and a co-productive approach has been undertaken to develop appropriate administrative, governance, planning and monitoring arrangements for the HSG, as set out in the draft practice guidance being consulted upon.

To inform the development of the draft practice guidance we have held a number of engagement events across Wales with key stakeholders, along with attending meetings with key partners, 1:1 meetings with local authorities and a call for evidence exercise with Universities and lobby groups.

The consultation seeks views on whether the arrangements set out in the practice guidance document are fit for purpose, are clear and enable commissioners and providers to fulfil the core purpose of the grant and deliver the essential support services required for the intended service recipients.

The Welsh Government is inviting responses to the consultation questions, which will help inform the final practice guidance document. A response form is provided at the end of this document.

2. Background - Case for Change

The Supporting People programme was established in 2003 and provided grant funding to local authorities to provide housing-related support to some of the most vulnerable people in Wales. The programme made a significant contribution to the prevention of homelessness and to reduce the need for more costly interventions by the NHS and/or social care.

During the course of 2018-19, the Funding Flexibilities project tested a new way of working in seven pathfinder local authorities. The aim of this work was to bring together a number of grants to strengthen the ability of local authorities and their partners to deliver preventative services focused on early intervention for those in the greatest need and to allow local authorities greater flexibility.

There were ten separate grants and the proposal was to merge these ten grants into one Early Intervention, Prevention and Support grant (EIPS). The individual grants were Supporting People, Flying Start, Families First, Legacy Fund, Promoting Positive

Engagement for Young People, Childcare and Play, Homelessness Prevention, Rent Smart Wales, St David's Day Fund and Communities for Work Plus.

In October 2018 a decision was made by Ministers to create two grants; a Children and Communities Grant (CCG) and a single housing related grant called the Housing Support Grant (HSG).

<https://gov.wales/written-statement-early-intervention-prevention-and-support-grant>

Consequently, from April 2019, the Welsh Government established a Children and Communities Grant (encompassing Flying Start, Families First, the Legacy Fund, Promoting Positive Engagement for Young People, St David's Day Fund, Communities for Work Plus and Childcare and Play), and a single Housing Support Grant (encompassing Supporting People, Homelessness Prevention and Rent Smart Wales Enforcement).

However, Ministers have set clear expectations that the CCG and the HSG should work in a seamless fashion, providing integrated services where appropriate. The work to produce and develop the new arrangements has been guided by this principle and with the objective of streamlining processes wherever possible.

3. Where we are now

The HSG came into being in April 2019, however full implementation of the grant is taking place over two stages. For 2019-20, the existing guidance, instructions and memoranda of understanding in place to support these programmes has remained in force, except where superseded by the HSG Supplementary Guidance (issued in January 2019).

During 2019-20 we have adopted a co-productive approach to develop a full and integrated set of guidance for the HSG. This is being consulted upon in the guidance document attached, and the final version will become applicable from April 2020.

Review of Distribution and Learning Disability Funding

Within the work being carried out to develop the HSG there are two other elements currently under consideration; the overall distribution of HSG funding to local authorities and the use of HSG funding to support people with Learning Disabilities (LD).

Two separate reviews are currently underway and external researchers have been commissioned to carry out work to fully understand the nature of both of these issues, and to gather evidence which can be used to formulate advice for a Ministerial decision later in 2019.

The engagement around these reviews will be dealt with as separate exercises and are not included as part of this consultation. The draft HSG practice guidance therefore continues to include the funding of LD provision so as to establish a default position until a decision is made.

4. This proposal – what are the main changes?

This consultation seeks views on the new draft practice guidance for the HSG. The guidance puts forward the following key changes to existing practices:

- **Core purpose of the grant**

The purpose of the grant has been widened to incorporate the whole spectrum of support necessary to prevent homelessness and build capacity. The new grant will be defined by its housing purpose and will be flexible as long as a positive impact on the user's ability to secure or retain a stable home can be demonstrated. The core purpose will be "to prevent homelessness and support people to have the capability, independence, skills and confidence to access and/or maintain a stable and suitable home."

The proposed structure also introduces the concept of a 'Housing Support Programme' which encompasses both the statutory duty to prevent homelessness and all of the services which are offered to support access to and maintenance of suitable housing solutions. The HSG is then the mechanism by which the non-statutory elements are funded. The aim is to break down the funding and cultural differences that have existed between homelessness prevention and relief and Supporting People services and to establish a strategic oversight of the whole system.

- **Length of Support**

The grant criteria will no longer describe support as time bound and there is no limit on the length of time support can be provided. Commissioners should decide on the length of time of support based on the need but should avoid a person developing dependency. The support will no longer be identified by specific user groups in order to recognise the complex needs of individuals needing support.

- **Funding of alarm services**

The guidance attempts to clarify the criteria around the funding alarms, which can be funded from HSG where the local authority takes the strategic decision to do so. However where hard wired alarms are provided in social housing settings and may be eligible for support through the welfare system, these should be charged through rent and service charges and should not fall under the HSG.

- **Information and Advice Services**

A number of support providers who receive HSG funding provide information and advice to individuals or households on financial, budgeting and welfare matters related to accessing and maintaining a home. The guidance sets out new advice in relation to quality assurance requirements in support of the Welsh Government [Information and Quality Framework Wales](#) (IAQF). We have discussed and agreed these requirements with Cymorth Cymru, and have also agreed that they will undertake a piece of work next year to develop good practice to support local authorities and providers.

The guidance also clarifies expectations around providers providing budgeting and debt counselling support and the need to check registration requirements with the Financial Conduct Authority.

- **Strategic planning process**

The proposed model seeks to secure the concept of the whole system of homelessness prevention through the Housing Support Programme by integrating the strategic planning mechanisms with the statutory duty to produce a homelessness strategy.

The proposed model requires local authorities to produce a four year Housing Support Programme (HSP) Strategy and an annual local HSG Delivery Plan, informed by a comprehensive needs assessment. The new arrangements will be implemented ready for local authorities to apply for the 2021-22 financial year, with the first HSP Strategy to be developed by December 2020.

The proposed model also offers more freedom to local authorities on how they engage stakeholders, delivering the Well-being of Future Generations duties rather than a prescribed joint-planning structure.

- **Payments, Monitoring and Reporting**

Proposed payment, reporting and monitoring mechanisms have been simplified to reduce the bureaucratic burden of the new grant. The implication is that Welsh Government will exercise less control over what is delivered on the ground, providing more flexibility and accountability to local authorities.

- **Regional Working**

Local authorities will be expected to work with neighbouring authorities to form Regional Collaborative Groups (RCGs) comparable with Health Boards. RCGs will not have a governance role, but will provide a forum for collaborative working.

Regional Partnership Boards (RPB) will provide the mechanism through which collaborative working between Health, Social Care and Housing can be developed. Therefore RCGs should build a close working relationship with RPBs so that services can be jointly commissioned and designed, and should establish a relationship with the Housing Representative on the RPBs.

Local Authorities are expected to fully engage with RCGs with the support of Regional Development Co-ordinators (RDC). The RDCs will facilitate collaborative service provision and identify opportunities to improve outcomes through collaboration.

- **Commissioning and Procurement**

The document provides more detailed and clearer commissioning and procurement guidance to support local authorities to take a more flexible and innovative approach to commissioning and procurement to be able to build a more diverse and sustainable market. For example, we have attempted to provide clearer guidance which explains

appropriate use of grants rather than contracting procedures and to encourage the use of longer term contracts with less disruptive renewal processes.

In addition a hints and tips document has been included as an annex in order to provide useful practical guidance to commissioners.

- **Housing Support National Advisory Board**

The Supporting People National Advisory Board (SPNAB) is a Ministerial advisory board which was built into the governance of the Supporting People programme. Proposed new arrangements will see the board becoming the 'Housing Support National Advisory Board' (HSNAB), which will provide advice to the Minister on policy development in relation to the Housing Support sector and the effectiveness of the grant in delivering its' objectives.

The new Advisory Board will not inherit the scrutiny or grant governance responsibilities of SPNAB, therefore there will be no requirement for local authorities and regional structures to report to the board.

There remains work to do by the board to establish the new structures, membership and terms of reference. You will therefore note that Annex D of the guidance document has not been included; this will be updated once finalised. Welsh Government will work with stakeholders to develop this work.

- **National Networks**

A national network currently exists for both the homelessness agenda and Supporting People programme. These are supported by Welsh Government and attended by local authority leads and Regional Development Co-ordinators in Wales. The two networks will merge creating one Housing Support network, which will work collaboratively with Welsh Government and all local authorities to share information and best practice. The co-ordination of the network will continue to be supported and monitored by Welsh Government.

5. Consultation Questions

Question 1a - Is eligibility for the grant clearly described, and correct in terms of its scope? If the answer is no, what would you change about the guidance?

Question 1b - Do you think the draft guidance provides a clear purpose for the grant? If the answer is no, what would you add to the guidance?

Question 2 – The section on funding for Alarm Services (at Annex F of the guidance) is intended to be clearer and is broader than in previous guidance. Is the scope for funding alarms appropriate and clear?

Question 3 - Do you think the strategic planning framework within the draft guidance provides sufficient –

- Flexibility,
- Accountability
- Transparency?

If not suggest how this could be improved.

Question 4 - Regional Working

Do you think the direction set for regional working and the scope of the Regional Collaborative Groups is correct?

Question 5 - Do you think the draft guidance has any negative impact on equality across the protected characteristics? If the answer is yes please explain why?

Question 6 - We would like to know your views on the effects that the draft practice guidance would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 7 - Please also explain how you believe the proposed practice guidance 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 favorably 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 favorably than the English language

Question 8 - We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

ANNEX A Response Form

Consultation on the draft Housing Support Grant Practice Guidance

Consultation Response Form

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

The closing date for response is 29 November 2019.

Please respond by completing the online form or completing the questionnaire and sending via email to SupportingPeople@gov.wales

Or by post to:

Supporting People Team
Housing Policy
Welsh Government
Rhydycar Business Park
Merthyr Tydfil
CF48 1UZ

1a. Is eligibility for the grant clearly described, and correct in terms of its scope? If the answer is no, what would you change about the guidance?		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Comments:		
1b. Do you think the draft guidance provides a clear purpose for the grant? If the answer is no, what would you add to the guidance?		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Comments:		
2. The section on funding for Alarm Services (at Annex F of the guidance) is intended to be clearer and is broader than in previous guidance. Is the scope for funding alarms appropriate and clear?		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Comments:		
3. Do you think the strategic planning framework within the draft guidance provides sufficient:		
<ul style="list-style-type: none"> • Flexibility, • Accountability, • Transparency? If not suggest how this could be improved.		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Comments:		

4. Do you think the direction set for regional working and the scope of the Regional Collaborative Groups is correct?		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Comments:		
5. Do you think the draft guidance has any negative impact on equality across the protected characteristics¹? If the answer is yes please explain why?		
Yes <input type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
Comments:		
6. We would like to know your views on the effects that that the draft guidance would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English.		
What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?		
Comments:		
7. Please also explain how you believe the proposed practice guidance could be formulated or changed so as to have:		
<ul style="list-style-type: none"> • positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favorably 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 favorably than the English language 		

¹The protected characteristics are: Age, disability, gender re-assignment, being pregnant or on maternity leave, race, religion or belief, sex/gender, sexual orientation, being married or in a civil partnership.

Comments:

8. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Comments:

Are you:

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input type="checkbox"/>

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:	<input type="checkbox"/>
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