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**Chartered
Institute of
Housing**
Cymru

Draft housing support grant guidance

CIH Cymru consultation response

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

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General Comments

CIH Cymru welcomes the opportunity to provide information a response to this consultation on the draft housing support grant guidance.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a *one housing system* approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in a sustainable framework;
- improves standards and develops the consumer voice within the private rented sector
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
- uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;
- promotes consumer rights & tenant involvement;
- and supports the continued professional development of housing practitioners.

1. Introduction

Housing related support via the Supporting People Grant has provided truly vital services for families and individuals to remain in their home, develop skills and live independently. We were supportive of the decision to combine the three funds covering homelessness prevention, housing related support and Rent Smart Wales enforcement activity. Whilst we recognise the shift the new structure represents, many of the characteristics remain coherent and we believe the good practice produced through the previous mechanism under the label of Supporting People should continue to be championed in the interest of increasing collaboration and consistent good practice.

One area that we believe requires careful and focussed attention is on the continued engagement of the Private Rented Sector (PRS) in working with and referring to support services funded through Housing Support Grant (HSG) funding. In work carried out through our Tyfu Tai Cymru project (Full report submitted alongside this response) focussing on private renting and mental health we found a concerning lack of awareness of housing related support services from landlords and tenants alike which for some seemed to clearly impact on their ability to maintain their tenancy. We believe a concerted effort is needed to increase awareness of PRS landlords and ensure their voice, along with that of tenant in the PRS is well-recognised by governance structures and service commissioners alike.

2. 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?

Due to the strong history between housing related support and social housing we are concerned that PRS landlord's awareness of support services to help maintain tenancies and support tenants continues to lag behind. We welcome the clear reference to the fund being tenure-neutral and believe the eligibility as it stands is sufficiently clear.

3. 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?

We believe this is sufficiently clear.

4. Do you think the strategic planning framework within the draft guidance provides sufficient – Flexibility, Accountability Transparency? If not suggest how this could be improved.

We agree that the proposed outline for the strategic planning framework to be sufficient. The suggestion within the draft guidance is that local authorities will be expected to engage with a number of stakeholder in shaping and implementing their HSG delivery plan. Whilst we agree with the stakeholders listed we are concerned that listing them in this fashion assumes that high quality engagement is both happening now and common place consistently across Wales.

We know that despite the positive work of local authority housing professionals and a wide variety of colleagues in establishing and working within the governance structure of the Supporting People Programme; Regional Collaborative Committees have been inconsistent in their membership from some bodies listed. With colleagues in health and social care increasingly stretched, we believe there is a need to address the impact on membership of RGCs across Wales ensuring there is consistency in all regions.

In a similar vein engagement with the PRS differs across local authorities. Whilst some have well established private landlord forums others do not. With the PRS playing a growing role in providing homes for people who may receive housing related support it seems timely to target engagement activity increasingly at this part of the sector to ensure landlords feel well supported and continue to build on good practice.

The guidance should place an emphasis on being open and honest about the strength of partnership working with other sectors, encourage a reflective exercise aimed at unpicking how links could be improved and point to good practice that can further guide thinking at a local and national level.

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

We welcome the vision of the Regional Collaborative Groups (RCGs) acting as forums to increase collaboration and share good practice. We believe that activity should be undertaken to learn form the experiences of those involved in the former Regional Collaborative Committees (RCCs) to inform how the RCGs can achieve success. It is clear that in speaking to our members involved that there was considerable inconsistency in the perceptions of each RCC with some being seen as leading the way, and others struggling to fully meet their intended purpose. We would be keen to see the views and insights of professionals inform and shape the workings of the RGCs.

The consultation is clear that local authorities will not be accountable to RCGs but must show how engagement with RCGs has shaped their approach. We would like to see additional guidance to reflect in more detail what the expectation on this engagement could look in practice to ensure meaningful use of the expertise of the RCG is done.

The membership sensibly mirrors the previous composition of the RCC structure. One addition we believe is required is a private landlord voice. Our report on private renting and mental health recommended that private landlords have a stronger voice in helping to shape how housing related support services are commissioned and delivered in practice. We believe that this addition would considerably improve the awareness and engagement of landlords working directly with support services to provide better, earlier support to tenants and prevent the breakdown of tenant-landlord relations in some circumstances.

Our report found that:

- One in three support organisations feel there is ‘never’ enough mental health support for tenants renting privately
- 62 per cent of landlords have had, or currently have a tenant with a mental health problem
- Almost half of private landlords felt they ‘never’ had enough support or information to support tenants living with mental health problems
- Landlords would like to access more information and support
- Early intervention is key to helping people maintain their tenancy
- There are suggestions that people with mental health problems sometimes face discrimination when trying to access private rented sector housing