**Post pandemic interim homelessness measures**

**CIH Cymru consultation response**

This is a response to the Welsh Government consultation considering views on post pandemic interim homelessness measures.

**Question 1: Do you agree with Welsh Government’s ‘no-one left out’ policy?**

Yes, we agree with the Welsh Government’s “no-one left out” policy. There can be no public benefit in leaving any individual without a safe and secure place to call home. That is at the core of our mission as a charitable organisation and are therefore in full support of the Welsh Government’s ambition of ending homelessness in all its forms and therefore ensuring no-one is left (or at risk of) sleeping rough.

**Question 2: Do you agree that adding a ‘person sleeping rough’ as the 11th category of Priority Need allows us to continue with the ‘no-one left out’ policy? If not, how else could this be achieved.**

We agree with the intention behind adding the 11th category to Priority Need. Many of our members who work within local authority homelessness prevention services report that it is already common practice to treat rough sleeping as a priority. Whilst it isn’t clear to what extent this is the approach taken by every local authority, it would appear to be a step that will bring the policy in-line with practice in many areas, acting as a driver for change where this isn’t the case at present.

**Question 3: Do you agree with the definition of ‘person sleeping rough’ than we propose to use? If not, please provide a reason for your answer.**

We agree with the definition in principle. Whilst we understand and broadly agree with the rationale behind not including people sofa surfing within this definition, we do have some concerns about potential unintended consequences. For example, we would not wish to see a situation whereby people who are sofa surfing believe that sleeping rough may be a route towards receiving help quicker, or being viewed as a greater priority. At present local authority homelessness prevention teams work hard to sustain communication with people sofa surfing to retain an overview of their housing circumstances and how precarious their situation is/is becoming. Local authorities therefore require the freedom to treat people sofa surfing at risk of homelessness (or at risk of sleeping rough) with sufficient priority, but clearly explicit inclusion in the definition would be damaging to local authorities’ ability to help those completely without somewhere safe to stay.

**Question 4: Do you agree that pressures caused by Covid-19 should be added as a new exemption under Article 6 of the 2015 Suitability Order? If not, please provide a reason for your answer.**

Yes we agree with this addition.

**Question 5: Do you agree with time limit of 31 March 2023 to address the temporary accommodation pressures caused by Covid-19 exemption?**

The consultation rightly highlights that the present (and by now long-standing trend) in many authorities sees many exceeding the legal limit within which it is expected that people will be housed in temporary accommodation. We see the logic in imposing a deadline, not least as a means to protect local authorities from legal challenges.

Having said this, one concern that our members working in local government raise with us regularly is the challenge of moving people into sustainable accommodation who currently reside in temporary housing. One of our members highlighted that for the first time ever, the authority now have a waiting list for temporary accommodation, as a result of the stark increase in demand. We believe that the deadline needs to be accompanied by a clear plan, led by the Welsh Government and coproduced with local authority and third sector colleagues that sets out clearly how the proposed deadline is to be met in practice given the stark shortages in housing options that many teams grapple with locally on a day-to-day basis at present.

**Question 6: What impact do you foresee on resources (for example staffing)? Do you have evidence to support this?**

It is clear that the situation faced by teams at a local level is unprecedented in modern times. Our Tyfu Tai Cymru project has been surveying local authority housing professionals both before, in the midst of and following the pandemic. This work has revealed the stark reality faced by many operational teams with key pressures reported linked to staffing, workload and resources.

The following points reflect the findings of both our surveying during the pandemic, and our most recent, yet to be published report, that captures recent experiences.

* Despite positive progress, staff strongly felt under pressure due to COVID-19 placing additional requirements on top of already busy day jobs - respondents felt that this was compounded further by a general lack of staff and affordable housing.
* Respondents have consistently reported that more staff would make a real difference. In addition to more streamlined links to access specialist staff/expertise e.g. mental health practitioners
* Over a third of respondents felt they had needed support with their mental health during the pandemic - largely as a result of work pressures and changes to their working environment. While many had felt supported by their local authority, people told us they had struggled with challenges including isolation and juggling work with childcare. Nearly 80% of respondents highlighted the need for more land and resources for local authorities to reach targets to deliver more affordable housing, suggesting that additional capital investment will need to be a focus.

More broadly, we believe there are other fundamental challenges, in addition to the additional staff resource needed, linked to resources in realising the policy in practice including:

* The recent and ongoing intensity in local housing markets, limiting the ability of teams to find suitable longer-term accommodation.
* The impact of the cost of living crisis on housing and living costs remaining affordable and the impact on demand for support services at a local authority level
* A lack of both temporary accommodation and a severe lack of suitable accommodation to move people into
* Changes to the funding environment whereby local authorities will have previously been accessing the hardship fund provided by Welsh Government to support the approach which was not a pre-determined budget or spend. Following the removal of that fund some local authorities are reporting that their budgeted spend to continue this activity is significantly lower that the actual spend realised during the pandemic.

**About CIH**

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 and their organisations 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](http://www.cih.org).

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