

## **1. The impact of wider policy developments on the programme including**

### **a) The overall clarity of the Programme's objectives**

Since the reconfiguration of the Supporting People Programme Grant back in 2012, following the Aylward Review, there has been a clear shift towards homeless prevention being its key priority. Whilst it is still perceived by many as supplementary service to social care, particularly given the significant financial constraints within the social care sector, the current guidance clearly states that its purpose is to help vulnerable people develop or maintain the skills and confidence necessary to live as independently as possible. In achieving its objective, it has housing, and preventing homelessness or people living in inappropriate institutional settings, at its core.

However, it is our opinion that Welsh Government need to decide whether or not it is their intention to publish the revised Guidance which has been in draft format prior to the publication of the Auditor General's Report. In general, it our opinion that the current revised draft guidance provides greater overall clarity of the Programme's objectives compared to the actual guidance, which remains in use.

### **b) The implications of, and emerging response to, the UK Government's Supported Accommodation review**

Without question, there are considerable risks associated with the Supported Accommodation review, in relation to the financial viability and long term sustainability of temporary accommodation. This has direct consequences for homeless hostels, refuge, designated exempt other properties for vulnerable groups such as those associated with needs attributed to substance misuse, offenders, domestic abuse, and mental health who are currently accorded exempt status. Similarly, risks are also identifiable within specialist accommodation such as Extra Care and Sheltered Accommodation, which are accorded specified status. We feel it is imperative that Welsh Government recognise the risks presented by what is seen as part of the Welfare Reform Agenda which will undoubtedly impact adversely upon some of our most vulnerable citizens, as noted above. A mitigating and fair strategy which is required, to alleviate the risk of exacerbating poverty

levels across all age groups, particularly for 16–21 year olds and the under 35, where the change in Local Housing Allowance rules will present inevitable financial and affordability challenges. Similarly should LHA be applied to Extra Care schemes, it will undoubtedly restrict access to only the most affluent, with the less well-off restricted to more institutionalised options. It is therefore necessary to recognise that a one size fits all approach to this issue is not appropriate, across the UK and that needs across Wales may also differ from one Local Authority to another.

**c). How the Welsh Government might improve communication about the priorities for the Programme and the impact of wider developments**

The Welsh Government needs to adopt a more collaborative and co-produced approach which includes all key stakeholders such as Local Authorities, Health Boards, Criminal Justice Agencies, Housing Associations, Third Sector Provider Organisations and most importantly of all, the service users, past and present. Collaborative working and joined up thinking within Welsh Government Departments such as Housing, Health and Social Care needs to be improved to effectively administer and realise the vision contained within the Social Services and Wellbeing Act 2014, The Housing (Wales) Act 2014 and the Wellbeing of Future Generations (Wales) Act 2015.

The presence of Welsh Government within the RCC meetings has also reduced significantly over recent months. Their previous attendance provided an opportunity for a number of agencies named above to engage in meaningful discussion and allow opportunity to challenge policy and procedures associated above. This opportunity no longer presents itself.

**d) How best to align the work of the Regional Collaborative Committees with the other collaborative governance arrangements**

It is important that there is improved synergy between other collaborative governance arrangements. A potential improvement on current arrangements would be to establish Smaller Regional Tackling Poverty collaborative groups on a regional basis, which would include Senior Leaders Heads of Services from all sectors etc making key decisions presented to them by working Groups or Sub Groups from the various tackling poverty programmes. This could reduce duplication in investment and time spent with some vulnerable

families/individuals. Furthermore, more efficient use of funding where duplication is reduced would extend provision to those whose needs currently remain unmet.

**e) The lessons to be learned from the mixed effectiveness and impact of the regional working over the past five years**

From a Supporting People perspective, it is reasonable and fair to assume the establishment of the Regional Collaborative Committee in North Wales has been successful in terms of promoting a more consistent approach where processes are involved. Arrangements have been implemented for the establishment of regional quarterly monitoring form, regional outcomes gathering and analysing, regional needs mapping database, and an agreed Regional Clawback Statement for non-delivery of service as per contract agreement, shared provider forums etc, to name a few. However, whilst this has demonstrated a will to work collaboratively, regional commissioning of service delivery has proved to be a complex issue, due to linguistic, demographic, socio-economic and cultural differences across the 6 North Wales Authorities as well identified local priorities in keeping with the Corporate visions of each individual Local Authority. It should also be noted that North Wales had prior to the compulsory introduction of its Regional Collaborative Committee had a long established Regional Planning Group, where work had already commenced to implement a more consistent approach to administrative processes. Furthermore, the lack of presence from Health and Probation on a regional level would appear to have restricted further progress, particularly in relation to adopting a more collaborative approach.

**f) The extent to which the governance and management arrangements for the Programme reflect the ways of working under the Wellbeing of Future Generations (Wales) Act 2015**

We recognise that the principle of sustainable development is key to effective delivery in achieving the aims and objectives of the above-mentioned Act and are of the opinion that the summary below demonstrates the extent to date in reflecting the aims and objectives of the Act.

Long Term – Supporting People is seen as a key preventative service aimed at reducing longer term issues and dependency on more costly forms of statutory intervention. Numerous case studies read over the years have clearly demonstrated that timely appropriate and effective intervention can yield considerable savings to the service commissioners whilst improving the lives of some of the most

vulnerable citizens. Our experiences demonstrate that there is a clear will at both local and regional level to ensure that short-term intervention achieves long-term gain, and Supporting People has a key role in ensuring this vision is realised.

Prevention – Supporting People continues to be at the forefront of homeless prevention and will doubtless continue to play a crucial role whilst funding is made available. The programme focuses on a need to provide early intervention in order to negate the need for other types of service provision e.g. statutory intervention. All partners recognise the value of the support and services provided. The recently reconfigured floating support service for people aged 55+ now provides a clear emphasis on prevention of homelessness and empowering the individual to live independently and feel part of the community without a need for any intervention from social care personnel or a need for unnecessary admission to hospital, or residential care.

Integration– Supporting People has on Anglesey worked in conjunction with programmes such as Communities First, and Families First to commission services to meet needs across a range of service users who include Young Vulnerable People, People with Mental Health Needs, People Leaving Prison and those who engage in substance misuse. Services such as building CV's job placements, counselling and therapeutic services that are not eligible for Supporting People Funding has been provided to complement SP commissioned services. Furthermore the Anglesey Supporting People Planning Group have recently integrated services for people with substance misuse and those involved with the criminal justice system, given the strong correlation.

A corporate pilot for the delivery of local asset co-ordination on the Island includes partners from Housing, Social Services and Health, working together on an identified geographical patch covering the Beaumaris area.

Collaboration – The progress achieved by the North Wales Regional Collaborative Committee has demonstrated a resolve and will to work collaboratively. However, there is a need to increase collaboration across other programmes to reduce duplication and utilise available funding in a more targeted and efficient manner.

Involvement – Service user involvement has been recognised as a key priority for development on both a regional and local level. There are regular consultations with service users, i.e. when undertaking service monitoring and reviews, taking part in tender evaluation processes and feeding back via a continuous on-line

service user questionnaire. Take up of the online service has been positive and evidence presented has been used within the decision making process. This includes the decision to procure an ongoing low level floating support service.

## **2. Monitoring and evaluation including**

### **a) How monitoring / outcome data is used to inform decision making about programme expenditure and contract monitoring**

Welsh Government have placed significant emphasis on the data gathered from the Outcomes Framework. As Strategic Commissioners, we fully support the ethos and value of an outcomes framework. However, we have regularly stated that the current outcomes system is unfit for purpose and welcome the proposed changes to the framework. It is reasonable to assume that Welsh Government currently place greater emphasis than Local Authorities / Planning Groups on the outcomes data when making key decisions which impact upon the Programme's Expenditure Levels.

Work undertaken both locally and regionally has resulted in a robust process to gather and monitor data across all projects in North Wales. This includes, throughput, the number being supported quarterly, numbers leaving etc. Equality data is also monitored. The data is analysed regularly in order to ensure contract compliance and that service is providing value for money. Any voids over 10% is clawed back, unless there are justifiable mitigating circumstances. Service user consultations are also used as monitoring mechanisms within Anglesey.

### **b) The revised outcomes framework that the Welsh Government is proposing and the extent to which it will address the limitations of the current framework**

On the whole we feel that this is a step in the correct direction, in that there is a significant shift towards the implementation of a person centred approach within the revised framework. However, we remain concerned that the capturing of outcomes is not a one 'size fits all' methodology. It is our belief that different service user groups will almost inevitably have different aspirations e.g. past experience has indicated that older people supported within the community will want to be made to feel safe and or be assisted to feel physically and mentally healthy. In comparison most young people entering the Supporting People environment will require basic tenancy management and daily living skills. Applying all outcome domains to our service users is not conducive to achieving

positive results which will benefit them in the longer term. It is better to concentrate on those areas which requires prioritising in the initial stages to ensure engagement and build trust. The shift from the current 1–5 scoring mechanism is welcomed. However we need clearer guidance on how the proposed 1–3 category is to be recorded, and more importantly how Welsh Government will interpret them, to make their informed decisions, particularly around future grant funding. Under current arrangements, service users can potentially achieve a score of 5 within a particular domain, but upon the identification of a new aspiration under the same domain, it could result in changing their score for that domain to 1 or 2 for the next reporting period. We have previously queried returns to Welsh Government where it was noted that only scores of 4 or 5 were classified as a positive outcomes, where it is our opinion that any increase in score, constitutes a positive outcome.

**c) How any revised outcomes framework arrangements can be best communicated and embedded**

Client aspirations would be best addressed by the service users themselves, therefore, it is imperative that their opinions and voices are heard and considered. Providers will also require improved clarity as to what some of the aspirations mean. For example feeling safe is a very open ended issue and could mean whole range of different things to different individuals. It is therefore essential that suitable training is arranged for providers from the outset, and previous lessons learnt from the initial roll-out of the SP Outcomes framework to ensure that a consistent and transparent process is adopted from the outset to enable a fit for purpose framework to be implemented.

**d) Other opportunities to strengthen monitoring and evaluation, including in assessing the relative value for money of comparable services**

Case studies have previously provided clear and tangible evidence of the effectiveness of the Supporting People Programme. Furthermore, cost benefit analysis commissioned to evaluate the SP Programme, along with the publication of regional documents such as the North Wales ‘Our Stories’ booklet ( and a similar Gwent version) have highlighted the significant value for money and savings to statutory services such as Social Services, Health and Criminal Justice. Given the advancement in technology over recent years it may be worthwhile considering the development of a spreadsheet / database which Single Point of Access co-ordinators /analyst can utilise when closing cases. The savings achieved via

Supporting People intervention can be directly compared with recognised unit cost of e.g. hospital bed, homeless intervention, criminal justice involvement etc, which probably would have occurred had it not been for the provision of Housing Related Support via the Supporting People Programme. The financial benefit to health related services is rarely acknowledged. There is a need for greater collaboration at local, regional and national level by Health representatives in acknowledging the undoubted cost savings to acute and community health services, as a direct result of the intervention of providers funded via the Supporting People Programme.

### **3. The distribution of Programme funding and financial planning including**

#### **a) The issues that need to be considered in developing and implementing any new funding formula**

A new formula needs to be fair and equitable on a national level. Previous attempts to re-distribute funding placed some Local Authorities at a substantial disadvantage. A 23% decrease in funding was implemented over a four year period. This resulted in presenting substantial financial challenges at a time when other budgets were also being reduced by considerable amounts.

A new formula should be based on need and vulnerability in accordance with the eligibility criteria to access Supporting People Services. Factors for consideration should relate to:

- The index of deprivation categories
- % of population in receipt of Universal Credit / Contributory JSA and Contributory ESA
- Number of people at risk of homelessness per 10,000 of the population
- Number of people assessed as homeless per 10,000 of the population
- GDP levels per Local Authority

#### **b) How budget pressures and funding uncertainty have affected service planning and delivery**

Annually agreed Grant awards have not been conducive towards achieving the principle of sustainable development which is intrinsically linked with Wellbeing of Future Generations Act, discussed above. Current funding arrangements does not

allow for effective longer term planning and there is constant uncertainty across service providers as to whether funding will be available or reduced year on year. Unfortunately, this creates a negative culture which results in service providers struggling to retain staff they have invested in and is ultimately transferred to the service user who having built a relationship of trust with a case worker, needs to familiarise and repeat the process with another member of staff. Funding uncertainty has also restricted development of new services, for fear of funding being unavailable for newly awarded contracts, particularly within fixed support services.

### **c) Reasons for identified wide variation in financial support for different client groups across local authorities**

The wide variation in our opinion is as a result of multiple factors as follows

**Historical Legacy Funding –** When Supporting People was first introduced in 2003, a maximising the pot approach was adopted which benefited some LA's more than others, as it was not based upon a needs led approach. This led to a substantial investment in the resettlement of people with Learning Disabilities from institutionalised settings as part of reform under the Community Care Act. Service users were granted assured tenancies in a number of properties and have remained in receipt of housing related support across a number of Local Authorities, with limited potential for independence. Numbers supported have been low with cost high. Locally, we have disinvested significantly within this area since 2012, and the Regional Collaborative Committee have identified Learning Disabilities as key area for development within the next Regional Strategic Plan.

**Close working with Social Services –** There has historically been a close working relationship with Social Services, with some Local Authorities have managed the Supporting People Programme within Adult Social Care. Investment in older people services, particularly sheltered housing (wardens) and community alarms has also been significant in terms of numbers accessing the service, but reflects an insignificant financial outlay due to the low unit cost levied for community alarm monitoring.

**Differing Local Priorities –** Each Local Authority is required to deliver against its Corporate Plan. It is therefore inevitable that there will be similarities as well as differing priorities across 22 Local Authorities which will impact on how Supporting People funded services are commissioned and delivered. This will be further

influenced by the 22 Planning Groups, which provide the necessary local governance and accountability on a local level, comprising of Housing, Social Services, Health and Probation.

**d) Reasons for the noticeable change in the overall proportion of programme funds on floating and fixed support**

We are of the opinion that we have an acceptable balance of floating and fixed support. However, any further provision of suitable and affordable designated properties would always be welcome. Floating support is less problematic in terms of commissioning, and does not involve the need to apportion housing management costs into the overall delivery cost. Furthermore, floating support can be seen as a more proactive support to assist vulnerable people to maintain their tenancies when faced with barriers such as welfare reform which impacts on affordability and the required skills to budget accordingly. Floating Support also promotes a preventative approach where if the support is effective and successful, it can result in negating the need for the service user to present as homeless or at risk of homelessness within the 56 day period as per the Housing (Wales) Act 2014.

In comparison, Fixed Support can be seen as being more reactive to crisis, where people are actually homeless and require considerable skilling, re-skilling as part of an intensive support package. It can also prove problematic in terms of location and can stigmatise particular vulnerable groups more than others. However, there will remain a need for a proportionate mix of floating support and fixed support, to meet the complex needs of an ever changing society.

**e) The extent to which local and regional planning processes and spending reflect well-evidenced needs, rather than historical pattern**

Both local (Anglesey) and regional (North Wales) RCC adopt a needs led approach to planning, remodelling or commissioning from new where applicable. This is evidenced by robust intelligence gained from, performance management tools and data, benchmarking with other areas, analysis of demographic sources and public consultation exercises to gauge the opinions of potential service users and key partners and stakeholders.

The above mentioned processes subsequently underpin written business cases which if approved result in the development of detailed service specifications

which along with an Invitation to Tender Documents form the basis of a very robust procurement process which is advertised on the Sell2Wales Portal. The commissioning cycle is completed via twice-yearly monitoring reports and 3 yearly service reviews which act as key evidence when considering the need for future service planning and commissioning.