The White Paper and Homelessness – Taking Things Forward

Report on Stakeholder Event Discussion Groups
October 2012
Section 1  Introduction

1.1  In October 2012, the Welsh Government arranged, via the Wales Homelessness Network, a series of consultation events on proposed changes to local authorities’ duties towards people who are homeless, which were set out in the Housing White Paper, “Homes for Wales: A White Paper for Better Lives and Communities”.

1.2  This report provides feedback to the Welsh Government on the comments made by practitioners attending the events.

1.3  The report has been produced by independent consultants:
•  Anne Delaney
•  David Hedges
•  Joanne McNally
•  Simon Inkson
who were engaged by the Welsh Government to facilitate and report on discussion in workshop sessions at the events.

About the events

1.4  The events were arranged on a regional basis as follows:
•  South East Wales  The Gate, Cardiff  2nd October
•  North Wales  Glyndwr University, Wrexham  3rd October
•  South West Wales  The Plough, Rhosmaen  5th October

1.5  Each local authority was allocated 6 places at an event and was asked to send representatives from within the authority and to extend invitations to external agencies involved in the provision of homelessness services. In addition a range of other agencies were invited to the events, including Tai Pawb, Community Housing Cymru, CIH Cymru and Shelter Cymru.

1.6  In total 119 delegates attended the three events, representing 71 organisations.

1.7  Prior to the events the Welsh Government circulated:
•  a discussion paper (attached at Appendix 1), which provided clarification about the proposed homelessness duties of local authorities when the Housing Act is implemented
•  questions to be posed in workshop sessions.

1.8  At each event delegates heard presentations from:
•  Welsh Government officials on the responses received to the White Paper consultation and the next steps in the process
- Dr Peter Mackie on the possible impact of the proposed changes to the homelessness duties of local authorities
- Chris Price on the views of local authorities on the proposed changes to their homelessness responsibilities.

1.9 Following the presentations in the morning and afternoon session, workshops were held where delegates were encouraged to provide their views on a number of pre-circulated questions.

1.10 The agenda for the events is attached at Appendix 2.

Structure of this report
1.11 The remainder of this report is set out in three main sections:
- Section 2 sets out the key themes that emerged at workshop sessions
- Section 3 provides details of workshop participants’ responses in the workshops to pre-circulated questions
- Section 4 sets out a series of recommendations aimed at:
  - Welsh Government
  - Welsh local authorities
  - partner organisations.
Section 2  Key themes from the workshops

2.1 In this section of the report, the facilitators have identified a number of key themes which emerged during discussions in the workshops.

Support for the proposed new responsibilities of local authorities
2.2 There was general support at all three events for the proposed new homelessness duties. Delegates at the event in Wrexham (in particular local authority representatives) expressed more concern about the proposals than delegates at the South East Wales and South West Wales events and their possible impact.

Understanding of the proposals
2.3 From some contributions made, it was clear that many delegates did not yet understand the nature of the duties to be placed on local authorities at the end of Stage 1, relating to prevention of homelessness and finding an appropriate housing solution.

2.4 At each of the events delegates articulated concern about the absence of detailed information to date on the proposed Stage 1 duty.

2.5 It is critically important that:
• the proposed new responsibilities are set out as clearly as possible (possibly in the form of a process map), to enable all stakeholders to develop a clear understanding of what is intended in relation to the Stage 1 responsibilities of local authorities.
• work commences at an early stage on the development of a code of guidance, to provide additional clarity on a wide range of issues raised by delegates.

Changing the culture of service provision
2.6 There was a unanimous agreement that the proposals, when implemented, will require local authorities and partner agencies to undergo a radical change in the way that homelessness and advice services are delivered in Wales. This will involve a fundamental culture change for local authority staff delivering homelessness and housing advice services, and for their partners in the third sector.

2.7 There was broad agreement that a radically new model of service delivery would need to be developed, requiring:
• a clearer focus on prevention
• an increased emphasis on a multi disciplinary and multi-agency approach to both preventing and alleviating homelessness
• the role of homelessness officers to develop into one of first point of contact and case manager, receiving applicants, providing housing advice and directing the applicant to more specialist advice or services, to either prevent homelessness from occurring or to deliver an appropriate housing solution. The quality of this intervention will be critical and staff need to be properly resourced and supported to perform this function effectively.

2.8 Securing this culture change will require:
• strong corporate leadership within local authorities (see separate theme below)
• adequate resources (see separate theme below)
• training for staff
• significantly improved partnership working
• the provision of support to facilitate change.

2.9 Significant training will be required for local authority and third sector agency staff. Training for local authority staff will need to focus not just on developing hard skills in terms of general housing advice and the changed aspects of their role, but also investment in the ‘softer’ interpersonal skills that will be required to support the move from ‘gatekeeper’ to ‘problem solver’ working in partnership with the applicant and others to secure positive outcomes.

2.10 Partnership working (both between local authority departments and between local authorities and external statutory and non-statutory agencies) will need significant improvement. Delivering effective partnership working within local authorities will require strong corporate leadership. Delivering effective partnership working with external agencies will require a change in the nature of relationships between local authorities and their partners to reflect greater mutuality.

2.11 Many suggestions were made about the support that the Welsh Government could offer local authorities to facilitate the necessary changes, and these are summarised in Section 4 of this report.

**Consistency of service provision**

2.12 There was broad agreement that the services provided by authorities and their partners should be consistent across Wales, in respect of both the range of services provided and the quality of service provision.

2.13 There were suggestions that, to aid consistency of service provision across Wales, the Welsh Government might want to:
• develop a model for the minimum forms of homelessness prevention tools or types of housing options it would expect local authorities and their partners to be able to provide or access
• undertake a mapping exercise of existing homelessness prevention, housing advice and housing solutions available across Wales, to inform the Welsh Government, local authorities and their partners of any service gaps.

2.14 In relation to consistency in terms of service quality, there was general support for the need to develop:
• accredited training for staff in the statutory and third sector
• common approaches to support particular duties (e.g. common support needs and risk assessments), but also recognition that any common approaches developed would need to offer some flexibility

2.15 There was broad agreement that there were opportunities for some services to be delivered nationally and some to be delivered on a regional basis. In addition there was a recognition that effective services do not always necessarily require an on-site presence and that local authorities and their partners need to work smarter (e.g. by making better use of video conferencing and IT systems to deliver services across Wales).

Corporate leadership
2.16 There was broad agreement that, in many local authorities, officers experience considerable difficulty in getting homelessness on the corporate and LSB agenda, and frustration at trying to engage with other services (particularly health).

2.17 There will be a need for strong corporate leadership if sufficient resources are to be allocated to deal with the challenges presented by the proposed legislation, and if key statutory services are to work effectively together to develop effective solutions for individuals with differing needs.

2.18 There was a call for the Welsh Government and the Welsh Local Government Association to do everything they can to support strong corporate leadership across all Welsh local authorities to highlight the proposed changes and the associated responsibilities for key decision makers.

Resources
2.19 Delegates were concerned about the additional financial burden placed on local authorities given the requirement of the new housing solutions approach.
2.20 Delegates were assured that the Minister was mindful of resource needs in implementing the proposed new homelessness duties. However, they wanted to stress that the Stage 1 duty would require significant resources for initial implementation.

2.21 Delegates considered that additional resources would be required for, e.g.:
- developing standard protocols for use across Wales
- disseminating positive practice
- developing a sufficient supply of ‘safe places to stay’
- increasing the supply of private rented accommodation
- ensuring that the work required to bring about the necessary change in culture of local authority homelessness services is delivered (there was a suggestion that resources for this should be ring fenced)
- providing joint training for frontline staff (of authorities and their partners) on their new roles and the new skills that would be required
- ensuring consistent levels of service provision exists across Wales in relation to housing advice and prevention services
- developing multi-disciplinary and multi-agency housing options and advice hubs
- supporting the development of regional collaboration and commissioning of services, where this is appropriate.

Other concerns
2.22 Delegates raised a number of other concerns about the proposed new housing solutions duty, and these are detailed in Section 3 of this report.

2.23 Key concerns included:
- the absence of the local connection requirement at Stage 1. There were concerns, expressed particularly by rural authorities, that they would experience a significant increase in the number of people approaching
- that the approach taken at Stage 1 (reasonable steps) may be affected if a local authority anticipates it will have a Stage 2 duty to the applicant. It was articulated that an unintended consequence of the new duties might be that the assessment obligations under stage 1 duties might be distorted if a local authority anticipated a Stage 2 obligation to the applicant
- fears from voluntary partners particularly that support needs assessments under the reasonable steps duty would be tokenistic
- concerns from a number of authorities (particularly those which had transferred their stock) about the willingness of partner housing associations to work with them to prevent and alleviate homelessness
- the need to ensure that potential applicants, and other agencies and professional groups, were aware of the proposed changes and had realistic
expectations of what local authorities could and could not be provide when they discharge their homelessness duties.
Section 3  Stakeholder responses to questions

3.1 This section of the report provides a summary of the views expressed by participants to each of the questions posed to them in the workshop sessions.

Question 1  What difficulties do you envisage in implementing ‘somewhere safe to stay’ and how can these difficulties be mitigated?

3.2 There were widespread concerns about the range of possible interpretations of what might be meant by ‘somewhere safe to stay’, and wholesale agreement on the need for clear guidance on this, in order to clarify the Welsh Government’s intentions, promote consistency, manage expectations, and minimise the risk of challenge. Delegates said that guidance would need to cover, e.g.:

- the applicant’s risk of harm and abuse
- location (e.g. access to social and family networks)
- the physical condition of accommodation (e.g. disrepair, space standards)
- the applicant’s perception of their safety and what weight is given to this
- the relationship between ‘safe to stay’ and the current ‘reasonable to continue to occupy’
- the weight given to an applicant’s preferences
- what happens if a suitable housing solution at Stage 1 is rejected by the applicant?

3.3 Many authorities believed that the requirement to find ‘somewhere safe to stay’ would result in a considerably increased demand for emergency or interim accommodation (the need for HMO accommodation was particularly highlighted). Delegates said this would pose a challenge for many authorities, particularly those in rural areas, areas with a significant tourist industry, university towns, and authorities that had transferred their stock. They feared that inability to meet increased demand might lead to:

- people being accommodated in housing inappropriate to their needs
- incompatible client groups being housed together
- a decrease in the availability of private lets for discharging Stage 2 duties.
- a surge in the use of bed & breakfast (this was considered to be a backward step, and clarification was sought as to whether it would be an acceptable option)
- compromised assessments based on “best fit”.

3.4 There was clear agreement that the interpretation of ‘somewhere safe to stay’ would need to be tailored to every individual applicant’s unique set of circumstances, and that, therefore, a needs assessment of each applicant would be necessary. There were, however, concerns about:
• the extent of assessment necessary, and fears that it would be labour and resource intensive. Some authorities said assessments would need to be ‘quick and dirty’, others (particularly the support and voluntary sectors) stressed that assessments would need to be thorough and robust if applicants’ safety was to be paramount
• the need to clearly identify risks as these would need to be managed by a third party in the majority of cases
• the danger that the burden of proof would be placed on the applicant not the authority
• the difficulties of carrying out a robust assessment on Day 1 (particularly, for example, if applicants presented at 4pm on a Friday)
• whether further safeguards would be necessary (particularly for vulnerable applicants), e.g.:
  o access to independent support and advocacy
  o someone independent to sign off to confirm process and that the offer of interim safe accommodation was adequate
  o a robust review/appeals procedure at this stage.

3.5 There was discussion (but no agreement) on the potential for assessments to be outsourced to organisations with expertise in this field (e.g. in specialist areas of support). There was broad agreement (but not consensus) on the need for a common approach to risk assessment to be adopted across Wales, and the development of a common risk assessment tool and clear guidance on its use.

Question 2 What do you think will constitute taking ‘all reasonable steps to achieve a suitable housing solution’?

3.6 Again, there was clear agreement that the interpretation of ‘all reasonable steps’ would need to be:
  • tailored to every individual applicant’s unique set of circumstances
  • based, therefore, on a clear needs assessment of each applicant
  • focus on identifying tools to assist the applicant rather than process
  • clarified in the code of guidance.

3.7 Third sector organisations expressed concerns about the approach to needs assessment given the time available, particularly in regard to ensuring the applicants views and preferences had been considered. These concerns mirrored those expressed in regard to assessing a ‘safe place to stay’. The need for authorities to listen to the applicant, and to empower the applicant to be part of the solution, was viewed as critical. It was acknowledged this would be difficult to legislate for or provide guidance. It was suggested the process could be supported by specialist agencies or peer advocates, and that the supporting people framework could be ‘modelled’ in this regard.
3.8 In order to evidence that ‘all reasonable steps’ had been taken, there would also be a need to develop personal housing plans for each applicant setting out:

- why the individual approached the authority
- what the authority had done to help
- what would happen next (with clear designated responsibilities and monitoring to ensure agreed actions were carried out).

Where multi-disciplinary teams were responsible for actions, there would be a need for a named single point of contact, and a trail of accountability.

3.9 Delegates listed a very wide range of tools available to help them to take ‘all reasonable steps’, including:

- independent housing advice
- independent financial/money management/debt advice
- mortgage rescue funds (one suggestion was that authorities should have access to a fund that would help them assist an owner to meet their mortgage commitments in exchange for an equity share)
- prevention funds (incorporating DHP funding)
- family mediation services
- landlord and tenant mediation services
- paper based bond schemes
- tenancy support (including crisis intervention services)
- target hardening services
- provision of an appropriate range of temporary accommodation options (including supported lodgings, shared housing)
- reconfiguration of supported housing to better address the new homelessness duties
- well developed supplies of affordable private rented sector accommodation
- good links with social lettings agencies
- funds to address disrepair in private sector homes
- joint working with education to inform young people about the realities of homelessness
- improved links with prisons to prevent prisoners becoming homeless on release
- agreements with housing associations to ensure that they play a more proactive role in preventing homelessness.

3.10 However, not all these tools were currently available (or available to the same extent) in all authorities. Delegates thought there was a need for a mapping exercise to be undertaken across Wales, to identify:

- what tools were available to each authority
- the effectiveness of existing tools in preventing homelessness
- gaps in the availability of tools.
3.11 In order to clarify the Welsh Government’s intentions, promote consistency, manage expectations, and minimise the risk of challenge, there was general agreement on the need for clear guidance on what authorities would need to do to ensure they had taken ‘all reasonable steps’. There was much discussion (though no agreement) about the need for that guidance to include a minimum list of tools which every authority should have in its toolbox, in order to avoid a ‘postcode lottery’. However, there was agreement that there was no need for ‘22 of everything’, and of the necessity for more regional and national working.

**Question 3  Do you think there should be a time limit on the Housing Solutions duty – if so how can we avoid unintended consequences?**

3.12 There was confusion about the time limit referred to, and inconsistency in the Welsh Government’s use of terminology (‘42 days’, ‘42 working days’, 56 days’, etc). Welsh Government officials clarified their intention that the time limit should be 2 calendar months, to ensure this stage was ‘short and sharp’.

3.13 There was general support from all delegates for the proposal that Stage 1 should be ‘short and sharp’, and should, in most cases, be capable of being completed within two months. Without such a time limit, authorities were concerned about their continued liability for the cost of temporary accommodation. It was also considered important the applicant had a clear timeframe, to avoid uncertainty and to minimise disengagement with the process.

3.14 However, there was also agreement that it would not always be possible for an authority to complete its duty within that timescale (e.g. developing an appropriate solution for mortgage repossession cases is likely to take significantly longer than two months). There was therefore a broad consensus that the legislation should require authorities to take all reasonable steps to discharge their Stage 1 duty within 2 months, and an expectation that this should in most cases be achievable, but provide authorities with the power to continue to work with an applicant to deliver an appropriate housing solution beyond the 2 month period, where this can be demonstrated to be necessary, and where the applicant agrees.

3.15 Authorities were concerned about the way in which their performance would be judged against this requirement. They were concerned that, for example, a performance indicator showing success against a 2 month target would result in flawed perceptions about performance, and perverse consequences (e.g. the adoption of an easily available, but perhaps inappropriate, solution for an applicant approaching target timescale). Delegates generally agreed that data collection on this requirement might be necessary (focussing on ‘softer’
outcomes), but that there should be no performance indicator. There was agreement that indicators should be very simple, e.g.:

- success in preventing homelessness at Stage 1
- repeat Stage 1 applications
- successful outcomes at Stage 2.

**Question 4 Is it reasonable to define a housing solution as somewhere that prevents homelessness for 6 months?**

3.16 There was confusion between the 6 months requirements at Stage 1 and Stage 2, and agreement that the difference between these requirements needs to be clearer.

3.17 There was also confusion about what constitutes a change of circumstances once a 6 month housing solution has been offered, and fears that this could be open to challenge. Clarification was called for, including how a local authority would be expected to approach the Stage 1 assessment process if someone re-presented in a short time frame.

3.18 Although there were some concerns that this could be disruptive to families (particularly to children’s education), there was broad agreement that, at Stage 1, a 6 months solution would be appropriate. Delegates said this aligned well with the length of assured shorthold tenancies in the private sector, or a licence for a supported housing project. Some pointed out the need to ensure that this time period was aligned with current tenancy reform proposals. The issue of whether offer of a licence agreement was a reasonable housing solution was also raised.

3.19 However, there was general consensus that the duty should refer, not to ‘preventing’ homelessness for 6 months, but to a solution which provides ‘a reasonable prospect’ of preventing homelessness for that time (and beyond). This was to reflect the reality that some solutions would undoubtedly break down before 6 months (e.g. due to arrears or ASB in the case of tenancies, or relationship breakdown in the case of young people remaining at home).

3.20 There was general recognition that, to achieve ‘a reasonable prospect’ of a solution being sustainable for 6 months, many vulnerable applicants, or applicants with a history of tenancy or relationship breakdown, were likely to require substantial additional support (e.g. in the form of tenancy support, mediation, etc.), and that such support would need to be made available in order for their prospects of sustaining the tenancy to be considered ‘reasonable’.
Question 5  Do you think the proposed new legislation will have any negative impact on the 9 protected characteristics?

3.21 In general, delegates thought that the proposed new legislation would have few negative impacts on the 9 protected characteristics.

3.22 However, given that priority need would no longer be a consideration in Stage 1, it was thought inevitable that some applicants in protected characteristic groupings could be disadvantaged (e.g. pregnant women).

3.23 The main concern was that if, as many delegates expect, there is a considerably increased demand for accommodation and support, this, together with the removal of ‘local connection’ requirements, could disproportionally impact on some vulnerable groups by making specialist accommodation or support less available to local people than it is at present.

3.24 Delegates suggested that, in order to mitigate any potentially negative impacts on protected groups, it would be necessary to:
- clearly tailor approaches to the needs of individuals via robust needs assessments
- ensure staff are skilled in interviewing techniques which make applicants feel comfortable in disclosing sensitive information (e.g. sexual orientation)
- ensure that vulnerable and difficult-to-engage applicants have access to suitable support and advocacy
- ensure that translation services are easily accessible
- conduct outreach work in respect of hard-to-reach groups
- develop formal protocols on confidentiality of personal data and exchange of information between local authority departments, support providers, and other agencies involved.

Question 6  To what extent do you see the new legislation changing housing advice in Wales? How can we work together to build stronger partnerships with advice services and to avoid challenges?

3.25 Delegates stressed the need for a clear distinction between the legal duty on local authorities to provide advice, and the advocacy and support provided by other agencies. The distinction between advocacy and support also needed to be clear. Some concerns were expressed about the potential for duplication. Third sector partners in particular argued the importance of ensuring that independent advocacy services were available (particularly for vulnerable applicants), and that legislation and regulation did not compromise this. Some suggested that advocacy could potentially be provided by peer advisors who have experienced the process previously.
3.26 There was general agreement from all delegates (including local authorities and advice providers) of the need for closer working with advice providers. Conversations and negotiation around the needs of individuals and their circumstances were considered more appropriate forms of engagement than formal reviews and legal challenge. However, this approach should never compromise the rights or legal position of applicants, or the independence of advice agencies, and there was widespread agreement that challenge was important to highlight weak areas and to clarify legislation. There was consensus that advice agencies and authorities should work closely together prior to the implementation of legislation to share interpretations, understanding and use of language, to support a joint approach to the development of guidance that would avoid unnecessary challenge.

3.27 There were concerns about the need to ensure that advice services are more accessible than they are at present in many areas. There were fears that reductions in LSC funding will mean that advice services would be further and significantly reduced by 2015, resulting in waiting lists which are unable to respond to urgent advice requests. There was agreement of the need for a national mapping exercise to identify the range and quality of advice available in each local authority area, and to identify any gaps.

3.28 There was agreement that the new legislation was likely to result in the need for authorities to procure (possibly on a regional basis) more specialist and wide ranging advice services from independent advice agencies (especially on income management, debt and financial inclusion) and from specialist support providers. Authorities were concerned about, e.g.:
- the increase in volume and diversity of individuals seeking advice
- the potential cost of procurement
- the need for clarity about the roles and responsibilities of all agencies involved (including first point of contact, lead responsibility, and responsibility for following up on recommended actions)
- the need for information exchange protocols to support such arrangements
- the importance of developing a shared local understanding about the range of options available to the authority, so that all parties have realistic expectations, and applicants are given consistent messages
- accountability for the quality of advice given.

3.29 There was discussion (but no agreement) on the best ways of ensuring consistency and quality of advice provision across Wales. There was some (but not universal) support for a nationally branded advice service, delivered locally, to ensure the advice provider is familiar with local housing market conditions. However, concern was expressed what ‘nationally branded’ might mean, and why national rather than regionally branded advice services were being
promoted. There was general support for a national standard on advice provision (providing the audit process was rigorous), and for common training for providers.

3.30 Several authorities (e.g. Cardiff, RCT) talked about their experience of bringing providers into one location to provide an advice hub. This was considered less feasible in some (e.g. rural) areas, but in cases where the location of a physical hub was considered problematic, there was the potential for developing a ‘virtual’ hub, using IT applications including Skype, with outreach services to less accessible areas.

**Question 7  How can we work in partnership with the private rented sector?**

3.31 Most agreed that there was a need for local authorities to make a step change in the way that they work to secure and increase the supply of PRS accommodation. Considerable concern was expressed by some authorities (particularly those in rural areas, areas with a significant tourist industry, and university towns) about the scarce supply, quality and affordability of PRS accommodation, and the near-impossibility of realistically increasing that supply significantly.

3.32 Many delegates thought that welfare reform could be ‘a nail in the coffin’ of successful working with the PRS in respect of homelessness. Others said they would be interested to see whether landlord registration and accreditation would provide a further disincentive for PRS landlords to engage, or would increase professionalism in the market.

3.33 Delegates across Wales referred to a wide range of initiatives which are currently being used, or could be used, to help engage the PRS, including:

- landlord forums (to aid communication)
- offering financial incentives by way of loans and grants (although they stressed that additional resources were needed to offer meaningful incentives to landlords)
- leasing schemes (though in several cases these were said to have skewed the market, and local authorities with in-house leasing schemes said they faced large losses in the light of changes to Housing benefit subsidy)
- use of the DHP budget to offset rent shortfalls and provide deposits
- use of Credit Union jam jar accounts to cope with direct payment
- helping landlords to mitigate risk (e.g. via rent guarantees, rapid processing of Housing Benefit)
- local or regional paper based bonds guaranteed by local authorities, to enable households to access the PRS
• educating private landlords about homelessness and people who receive benefits
• ensuring that tenancy support is available to tenants living in the PRS
• providing an advice service for landlords
• providing a landlord and tenant mediation service
• undertaking pre tenancy work with service users (including help to complete Benefit applications and set up bank accounts)
• provision of tenancy training (possibly linked to an accredited qualification)
• developing social lettings agencies or pump priming the creation of additional capacity in existing social lettings agencies.
• working with private developers to increase awareness about the need to support local development plans to meet need and free up the supply of private rented accommodation.

3.34 There was agreement on the need to map positive practice across Wales, and also to import positive practice from the rest of the UK and Europe

3.35 Delegates stressed the need for local authorities to act corporately in their dealings with the PRS, and to ‘join up’ PRS initiatives (e.g. by ensuring that empty homes renovated under ‘Houses into Homes’ schemes are used to increase the supply of PRS accommodation to Stage 1 homelessness applicants, by ensuring no inefficiencies in Housing Benefit processing and payment impact on landlords’ willingness to work with local authorities).

3.36 Authorities and agencies with wider experience of working with the PRS stressed that not all PRS landlords had the same needs. Most would jump at the chance of having a guarantee of 52 weeks occupancy per year, rent paid on time, and robust support and advice when things went wrong, but it was necessary to ask individual landlords what would be most important to them, and to deliver the packages of support and assistance that individual landlord wanted.

**Question 8  How can we work in partnership with support services, social services, health, and other statutory agencies?**

3.37 There was some concern about the availability of support services generally. It was generally agreed that the new homelessness duties were likely to require an increased level of input from support services. North Wales delegates, in particular, were concerned about the shortage of support services and supported housing solutions in the area.

3.38 Delegates listed a range of roles for support services under the new legislation. These included:
• providing needs assessments (especially in relation to specialised needs) at Stage 1
• supporting and providing independent advocacy for applicants (particularly vulnerable applicants) as they move through the Stage 1 process
• providing supported, emergency and temporary Stage 1 accommodation (there was a general feeling from some local authorities that having control of Supporting People monies would enable them to remodel services to address this need)
• providing family mediation support for young people and parents
• providing support to tenants to maintain their tenancy
• providing crisis intervention support to prevent individuals from losing their homes.

3.39 There was clear recognition that the threat of homelessness, whilst considered to be a housing problem, is often related to a range of other factors, and that effective solutions to homelessness often require the input of a wide range of agencies in order to bring about an effective solution. Although some partnerships were reported to be working well, a large number of delegates reported substantial difficulties in accessing this input currently, and in getting the necessary commitment from other departments and agencies, including:
• other departments within the same authority (many delegates reported difficulties in engaging with social services, in particular) Should there be a named individual in social services to be a link person to facilitate cooperation
• voluntary agencies (there was some feeling that competition for contracts was damaging to partnership working)
• statutory bodies (with health being most frequently mentioned as being difficult to engage).

3.40 Sharing budgets was suggested as a means of fostering joint responsibility for individuals with more complex needs.

3.41 There was widespread agreement of the need for:
• housing to get heard corporately at the Local Service Board
• strong local authority corporate leadership in pulling together all local authority departments (e.g. social services, Housing Benefit), statutory organisations (e.g. health services, police), and third sector services (e.g. support providers, advice agencies) to develop effective solutions to the issues presented by individuals
• proper resourcing to ensure partnerships were able to work effectively
• a well-coordinated approach to ensure that applicants do not have to repeat their stories to each agency (there was a general feeling, for
example, that many agencies do not currently trust assessments undertaken by another agency)

- the Welsh Government to take a strong lead in ensuring inter-agency cooperation and coordination:
  - externally, by stressing the importance of this to authorities and other agencies involved
  - internally, by strongly promoting the necessity of this approach with other Welsh Assembly departments
  - by collecting and disseminating examples of positive practice.

**Question 9  How can we work in partnership with HAs/RSLs?**

3.42 There was a perception amongst some delegates that some HAs were selective, and that performance targets make them reluctant to house homelessness applicants. Some felt that HAs could do more, rather than the minimum they were required to do.

3.43 However, delegates referred to a wide range of ways in which authorities and housing associations across Wales are working, or could work, in partnership to further the new approach to homelessness. These included:

- working with HAs to provide market rent housing
- working with HAs to provide social lettings agencies
- use of HA stock to provide emergency accommodation
- conversion of redundant sheltered schemes into emergency accommodation
- working with HAs to provide pre-tenancy training for applicants (including excluded tenants), possibly linked to an accredited qualification (to help excluded tenants access private or socially rented housing, and to help reduce the rate of tenancy failure generally)
- utilising financial inclusion skills developed by HAs to provide money management/ debt advice services
- working with HAs on the provision of early information in relation to the ending of tenancies, and to carry out more intensive preventative work with their own tenants.

**Question 10 What can the Welsh Government do to offer support in the years before implementation to help local authorities and other organisations to ready themselves?**

3.44 Delegates had a wide range of suggestions as to the support they needed from the Welsh Government.
3.45 They thought that Welsh Government support would be essential to emphasise to authorities the requirement for a fundamental culture change in the way they provide homelessness services, and that they should, e.g.:
- run a series of seminars to help local authorities think through the process of change
- assist housing colleagues to ensure that this is understood across local authorities, and to promote these changes to staff and members, by:
  - producing presentation materials which could be used locally
  - sending Welsh Government officers to support presentations to staff and members
  - ensuring that the Minister continues his dialogue on this issues with members and with other Ministers
- promote lean or systems thinking reviews to ensure that staffing resources were used to their best effect.

3.46 They wanted the Welsh Government to produce publicity materials for use across Wales, to:
- provide information to the public about the revised homelessness role of local authorities and how to access social housing, and to raise the profile of the PRS as an acceptable housing option
- provide information for other professional groups about the revised homelessness role of local authorities and how to access social housing, and to promote realistic expectations about what housing options services can and cannot provide
- provide information for landlords on the support available to them from authorities and their partners.

3.47 They wanted the Welsh Government to facilitate the development of real partnerships and collaboration to develop services and approaches to providing housing solutions, and to:
- disseminate positive practice examples
- develop standard protocols for use across Wales
- develop a process which evidences the effectiveness of partnerships working.

3.48 They suggested that the Welsh Government should fund the development and maintenance of a housing solutions IT system, to enable people who move from authority to authority to be tracked, and to free up resources currently spent producing statistical returns.

3.49 They wanted the Welsh Government to develop clear guidance (on the range of issues referred to in the previous sections of this report) on how the revised process will work, and to:
actively involve practitioners and the Ombudsman in the production of this guidance
use early drafts of the guidance to assist corporate discussions in local authorities
ensure that final guidance was made available at least 6 months prior to the introduction of the new duties.

3.50 They asked the Welsh Government to closely analyse the impact of other pieces of legislation and policy development on the revised homelessness proposals, e.g.:
- the potential impact of new approaches to PRS enforcement on the available pool of PRS accommodation
- the impact of tenancy reform (in particular the development of a minimum Assured Shorthold Tenancy term of 12 months)
and to ensure that other initiatives are linked to homelessness e.g.:
- portable discount
- shared ownership to free up social housing for homeless households.

3.51 They made a plea for the introduction of a new (and lighter) approach to the regulation of homelessness, and for less bureaucracy, including:
- revision (and reduction) of requirements for the production of data returns on homelessness
- the introduction of Results Based Accountability to assess the effectiveness of prevention activity.

3.52 There was, of course, concern about the resources that would be needed to implement the new legislation, although this concern was evident to a far greater degree in discussions with North Wales delegates, and far less prominent in discussions in South West Wales. When asked what they thought additional resources would be necessary for, delegates listed a wide range of local resource requirements, including for example:
- the development of a sufficient supply of ‘safe places to stay’
- increasing the supply of private rented accommodation
- the work that would be needed to bring about the necessary change in culture of local authority homelessness services (there was a suggestion that resources for this should be ring fenced)
- joint training for frontline staff (of authorities and their partners) on their new roles and the new skills that would be required
- the development of housing and debt advice
- mortgage rescue schemes
- the development of housing options and advice hubs
- the development of regional collaboration and commissioning of services.
3.53 It was suggested that each authority should be required to identify its particular development needs (perhaps with the support of external assistance similar to that currently being offered to authorities by the WLGA (via Welsh Government grant) in regard to the PRS.

3.54 They wanted the new legislation to be robustly piloted (not just in authorities who currently have well-developed services, but also in authorities where services are not so well developed).

3.55 They asked the Welsh Government to ensure there was a good flow of information, so that all practitioners are updated on Welsh Government plans for implementation, and progress towards implementation.

3.56 Above all, they asked for the Welsh Government to listen and take on board what was being said by stakeholders about the likely impact of changes.
Section 4  Recommendations and Actions to Support the Implementation of the New Homelessness Duties

4.1 This section of the report draws on the suggestions made by delegates on actions which need to be undertaken prior to the implementation of the new homelessness provisions. Delegates felt that an implementation date of April 2015 provided a significant lead in time, and that this opportunity needed to be maximised to ensure a smooth transition.

4.2 The recommendations below are addressed to the following agencies:
- the Welsh Government
- local authorities
- Voluntary Sector
- Housing Associations

Welsh Government
4.3 Recommendations to the Welsh Government are grouped under the headings:
- legislation
- guidance
- resources
- other actions to support implementation.

4.4 The Welsh Government should:

Legislation
i  include in legislation a power (with consent) to extend the 2 month time limit on the Stage 1 duty

ii  reconsider the issue of local connection for the Stage 1 duty. This could be introduced where a local authority has implemented the Wales Housing Measure 2011, to suspend the Right to Buy

iii amend the wording of the Stage 1 duty to say that the housing solution provided by the local authority should provide ‘a reasonable prospect’ of preventing homelessness for a period of 6 months

Guidance
iv  work with local authorities, housing associations, third sector partners and the Public Sector Ombudsman for Wales to produce clear guidance in relation to the new duties of local authorities

v  ensure that final guidance is available, a minimum 6 months prior to the implementation of the legislation
vi develop guidance to provide clarity in relation to:
  • what constitutes a “safe place to stay” (with due regard to minimum standards)
  • what constitute ‘reasonable steps’ under the proposed new duties
  • what constitutes a ‘change of circumstances’ after the Stage 1 duty is discharged
  • set out a minimum level of service provision required to effectively prevent and alleviate homelessness

vii develop a series of complex case scenarios, ask authorities how they would approach their resolution, use best practice responses to inform the guidance, and disseminate best practice responses widely.

Resources
viii consider the provision of additional resources to the sector, to:
  • facilitate partnership working, including dissemination of positive practice examples, and assisting in the development of standard protocols for use across Wales. This could possibly replicate the work funded by the Welsh Government to ensure local authority compliance with the Southwark judgement.
  • support the culture change required within existing local authority homelessness services. This funding should be ring fenced specifically for this purpose
  • provide joint training for frontline staff (of local authorities and relevant statutory and voluntary agencies) on new roles and new skills required
  • enable the development of specific housing solutions (e.g. mortgage rescue, housing advice, debt advice, PRS initiatives) to ensure that service provision is consistent across Wales
  • develop and maintain a housing solutions IT system to enable people who move from authority to authority to be tracked, and to free up resources currently spent producing statistical returns.

Other actions to support implementation
ix promote the vision and intention behind the legislation, and provide leadership for its implementation. It should:
  • immediately provide clarification on the Stage 1 duty, by means of an annotated process map, to ensure that all stakeholders understand the impending changes
  • consider establishing an Implementation Group which would support local authorities and their partners realign services in preparation for April 2015
  • develop an implementation plan
• ensure a good flow of information between now and implementation, to ensure that all practitioners are updated on progress and are confident that their development work to meet their new duties is fit for purpose
• arrange additional consultation events (like the events which are the subject of this report) to support shared thinking and solution focused thinking
• produce publicity materials in relation to the proposed revisions to local authority homelessness duties, which can be used across Wales to:
  o raise awareness of the changes
  o promote realistic expectations about what housing options services can and cannot provide
  o raise the profile of the PRS as an acceptable housing option amongst the general public and other professional groups
  o provides information for landlords on the support available for them from local authorities and their partners

x work with the WLGA to seek local authority partners who are willing to ‘pilot’ the housing solution model in a live environment. Pilot authorities should be a mix of local authorities where services are well developed and those where services are not so well developed. Pilot authorities should be supported during the pilot process and the results used to inform development of the guidance

xi support the development of common risk and support assessment tools for applicants, to promote consistent, good quality assessment and support local authorities in their new duties

xii reduce the requirement for data returns on homelessness, and develop a set of key performance indicators which focus on outcomes, not process

xiii establish the current availability and effectiveness of services in each local authority area to support the implementation of the proposed new homelessness duty. They should:
  • undertake a mapping exercise to establish what tools are available to each authority, to ensure that there is a consistency of service provision across Wales
  • review Section 180 funding to ascertain the effectiveness of funded activities in supporting the prevention and alleviation of homelessness
  • review Supporting People funded services to ascertain their effectiveness in supporting the prevention and alleviation of homelessness
• use the findings of these exercises to inform the future use of S.180 and Supporting People resources

xiv ensure that other existing and proposed legislation is reviewed and analysed to assess its potential impact on the proposed homelessness legislation, and to ensure that they do not result in unintended consequences for homelessness services

xv ensure that all other housing initiatives promoted by the Welsh Government (e.g. shared ownership initiatives, the Houses into Homes programme) are linked to the alleviation of homelessness and ensuring that a supply of affordable rented housing is available for homeless households

xvi consider the implications of tenancy reform (and in particular the development of a minimum Assured Shorthold Tenancy term of 12 months) on the proposed homelessness legislation

xvii establish and support a national PRS network to share learning to support the development of local strategies to increase the supply of affordable private rented housing

xviii through the Housing Association Regulatory regime, ensure that housing associations comply with S.170 of the Housing Act 1996 to “co-operate to such an extent as is reasonable in the circumstances in offering accommodation to people with priority under the local authority allocation scheme”

Local Authorities

3.22 Each local authority should:

i demonstrate strong and effective corporate leadership, ensuring that all senior officers, staff and members understand:
• the implications of the proposed legislation
• the requirements for local authorities to act corporately in discharging their duties
• the need to ensure that homelessness functions are adequately resourced to meet the anticipated growth in presentations and the requirement to provide housing solutions for a larger group of applicants

ii ensure that locally funded initiatives and wider local authority strategies support the implementation of the new homelessness duties
iii undertake a comprehensive analysis of the causes of homelessness in their area and develop strategic responses to address both the causes and unmet needs

iv consider undertaking ‘lean’ or ‘systems thinking’ reviews of their approach to the implementation of their new duties, to ensure that staffing resources are used to best effect

v develop local and/or regional working groups with advice providers (in line with future Welsh Assembly guidance) to better understand each party’s interpretations of the new legislation, and to reach a common understanding, to minimise future challenges

vi develop and maintain an up-to-date and comprehensive directory of tools available in their area to prevent and alleviate homelessness

vii consider the provision of an on-call advocacy service provided on either a local or region basis, to assist and advocate for vulnerable applicants who present as homeless

viii consider the use of Results Based Accountability systems to assess the effectiveness of their prevention activity, to support a focus on outcomes rather than processes

ix consider the need for funding for the provision of furniture and appliance ‘starter kits’ to meet the basic needs of an applicant’s, irrespective of tenure.

Voluntary Sector
3.23 Voluntary sector organisations should:

i continue to raise awareness of the proposed new legislation at relevant forums

ii continue to engage with the Welsh Government and local authorities during the consultation process, to ensure the voice of the third sector is heard

iii engage with service users and seek their views on the Stage 1 duty, to ensure that the views and preferences of applicants are considered

iv review their activities to ensure they support to the best of their ability the prevention and alleviation of homelessness
v consider establishing social enterprises as a mechanism to deliver peer advocacy support

Housing Associations
3.24 Housing associations should:

i continue to raise awareness of the proposed new legislation at relevant forums

ii continue to engage with the Welsh Government during the consultation process to ensure that their views and, needs are heard

iii share their experiences (e.g. on the development of social lettings agencies, financial inclusion activities) to ensure positive practice is disseminated throughout Wales

iv explore the use of their housing stock to provide local authorities with a supply of emergency accommodation

v review their policies and processes to ensure that opportunities to prevent homelessness are maximised

vi work with local authorities and other partners to provide pre-tenancy (possibly accredited) training to homelessness applicants

vii ensure that front line staff develop and maintain good up-to-date awareness of the range of services available locally to prevent and alleviate homelessness.
Introduction

1. The challenges facing Wales as a result of pressures on housing supply, economic pressures such as the increasing cost of living and Welfare reform are well documented. The Housing White Paper “Homes for Wales” set out proposals for a new agenda to tackle homelessness through legislation and other means. It is a significant opportunity to boost even further the emphasis on preventing homelessness in the first place so that as few people as possible have to suffer the damage it does to people’s lives, to their health and well being and, in the case of children, to their development and education.

2. The formal consultation on the White Paper ended on 17 August 2011. The responses on homelessness and related matters are being considered in detail. The consultation ran in parallel with the second phase of the research study – an impact assessment – that was commissioned from Cardiff University. The report from the impact assessment has been published.

3. The next stage in bringing forward the legislation is to determine the detailed proposals. As with the research study, the involvement of stakeholders is important to the Welsh Government. This paper provides the basis for seeking more views so that, where necessary, the proposals can be refined.

4. This paper is intended to provide the more detailed presentation of the changes we wish to make, to enable a fuller understanding of our proposals and the difference they aim to make. We also highlight some questions where we are in particular seeking views to help us to develop the final package.

5. This paper provides the background for the stakeholder events being held in the first week of October. Some questions to guide discussion on the proposals are attached at doc 1. Following these events and responses to this paper, Welsh Government officials will take into account the views of stakeholders in preparing advice for the Minister for Housing, Regeneration and Heritage. This will form the basis for the drafting of the homelessness element of the Housing Bill.

6. We anticipate Royal Assent for the Housing Bill in 2014, with commencement of the first provisions on homelessness from April 2015. Thus there will be at least two and a half years before the legislation will take effect, and the Welsh Government is keen to use this time to work with local government and others to prepare for introduction. Further consideration will be given to the timing of commencement of the various aspects of the Bill.
Comments on this paper are invited by 12 October 2012. Responses should be sent by e-mail to: geoff.marlow@wales.gsi.gov.uk, and christine.parry@wales.gsi.gov.uk or by post to: Geoff Marlow, Housing Directorate, Welsh Government, Rhydycar, Merthyr Tydfil, CF48 1UZ

“Housing Solutions”

8. The White Paper used the term “Housing Solutions” to try and capture in a few words the nature of the proposed model. The phrase does reflect the central goal of finding a solution to people’s circumstances. However, it is clear that from some responses we have received and subsequent discussions that the term is one which is open to a number of interpretations. The thrust of all proposals is a greater emphasis on preventing homelessness and fairer and more consistent treatment of those who require assistance. This overall approach has considerable agreement from all stakeholders and service users.

9. This paper provides an opportunity to clarify the model, which has two main stages. The ‘First Stage’ is the new duty and provides the greater emphasis on prevention that is described above. The current arrangements for assessing and assisting people, which continue to be vitally important, feature as the “Second Stage” of the model.

10. Consideration is being given to the use of the term “Housing Solutions” and the need for this or for an alternative “branding” for the model and action that stems from it. Comments are invited. The key is a common understanding of the model, its broad aims, and how it will bring about a greater focus on prevention.

The proposals – an overview

11. Current legislation as set out in the Housing Act 1996 is based around the assessment of duties owed to an applicant for homelessness assistance, which vary depending on the outcome of a number of tests. For those who are unintentionally homeless and in priority need, the final outcome may vary but there is in effect a right to a social housing tenancy, whilst for others the offer may be only limited advice and assistance.

12. The proposed reforms are intended to introduce a much more inclusive service we are calling housing solutions, which will be the first stage of the legislative process. This will give everyone eligible for public assistance and at risk of homelessness the right to specific advice and help to find or retain accommodation which meets their housing needs. This intervention is intended to be relatively short, sharp and focused, to enable the best option available at that time to be identified and pursued.

13. We are retaining most of the existing duties to people who are unintentionally homeless and in priority need but for whom homelessness cannot be
prevented. This will form a second stage which we believe most people will not need to access due to the success of the prevention process under the first stage.

14. Our proposals also involve a more flexible discharge of this second stage, with applicants no longer automatically entitled to a social rented sector tenancy, although there will be an entitlement to a 12 month assured shorthold tenancy in the private rented sector or a social housing tenancy.

15. We are also allowing flexibility in the application of the intentional homelessness test at the second stage.

16. This new model is designed to prevent homelessness at an earlier stage and for a much wider population than has happened in practice before. We are aware that there is much good practice already in existence which informs our confidence in the achievability of this model.

17. We do intend to end intentional homelessness decisions for households with children by 2019, including those comprising only under 18s, thus helping to implement our commitment to the UN Charter on the Rights of the Child.

18. We would also like to strengthen the focus of priority need on vulnerability over time, and we will carry out further work to review the status of former prisoners and rough sleepers.

19. Our vision requires cross-sector collaboration to achieve the prevention of social exclusion. We will examine further the best mechanisms to ensure that housing associations, the health and criminal justice sectors, and other local government and public services support this vision.

Redrafting the Legislation

20. The existing law relating to homelessness is set out in Part 7 of the Housing Act 1996 and is supplemented by various regulations. The legislation has been amended numerous times since it was first introduced in 1977 and is fairly convoluted. To add our proposed changes to the existing law would make it even more complicated and confusing. Therefore, the intention is to re-write all of the existing homelessness law in one place together with the changes that we propose. The new law will be set out in the Housing Bill. It will be necessary to retain the powers of the Welsh Ministers to make some policy (e.g. priority need categories) by regulations as it is necessary to retain flexibility to meet changing circumstances in some cases. Once the Housing Bill is in force, the existing homelessness law will cease to apply in Wales (although it will continue to apply in England).
First Stage - Housing Solutions/Prevention

21. Where an authority has reason to believe that someone who applies for assistance is homeless or threatened with homelessness within the next 56 days, it must make enquiries to establish whether the person is eligible for assistance.

22. The authority will then need to establish whether the person is currently homeless or is threatened with homelessness within the next 56 days.

23. If they are eligible for assistance, the authority must undertake an assessment of the circumstances and needs of the applicant in order to facilitate the prevention or alleviation of homelessness.

24. The authority must take reasonable steps to assist the applicant to prevent their homelessness or find suitable accommodation through retention of their existing accommodation or finding alternative accommodation.

25. In discharging this duty the authority would have to have due regard to local housing market conditions, the support needs of the applicant’s household including their health and disability needs, and their views and preferences.

26. The time limit proposed in the White Paper of 6 months is too long, as the First Stage needs to be implemented in a relatively short period to avoid uncertainty for the applicant. We are minded to set a time limit of 42 working days after the application has been made. The duty will be ended either by:

   (i) provision of assistance and information to the applicant to retain or procure specific accommodation to prevent the risk of homelessness
   (ii) lapse of the time limit, or by notification to the applicant that reasonable steps have been taken and have not been successful
   (iii) Refusal by the applicant of the ‘solution’ or to co-operate with the work to achieve one.

27. We propose to introduce a new power to enable local authorities to provide advice and assistance to any person in order to reduce their risk of homelessness, including those who may be at risk in a greater time period than 56 days, and those where a first stage duty has been brought to an end, such as those where the authority have not been able to find a solution but wish to continue working with an applicant over a longer period.

28. Where a first stage duty has been discharged, there will be no right to a further application until the applicant’s circumstances have changed.
**Second Stage**

29. Where the prevention duty has been ended under (ii) or (iii) above, the application will then be assessed under the second stage duties which are currently set out in s183 and subsequent sections of the 1996 Act.

30. There will be no right for the applicant to apply for assistance under the second stage duties where information and assistance has been provided to retain or procure accommodation under the first stage or where the applicant has not co-operated with implementation of that first stage duty.

31. The applicant will have the right to internal review and then to appeal to the Court if they believe that the prevention duty has not been achieved in addition to existing rights of review and appeal at the second stage.

32. The Welsh Government will issue guidance on the implementation of this duty which the authority must have due regard to.

**Safe Place to Stay**

33. When assessing an application for homelessness assistance, the authority must identify on the first day of the application whether the applicant has somewhere safe to stay.

34. If the applicant does not have a safe place to stay, they will be required to find the applicant’s household safe and suitable accommodation until either the person finds their own safe accommodation or where the prevention duty is ended. Where the applicant continues to be subject to assistance under the second stage and has no safe place to stay, the authority will be under a continuing duty to provide safe and suitable accommodation until the applicant’s priority need status is determined and if they are in priority need until the second stage duty is discharged.

35. The current s188 duty to provide interim accommodation will no longer be needed due to the new safe place to stay provisions, and thus will be removed.

36. Safe accommodation will be accommodation where there is no significant risk of harm or abuse. Further guidance on this will be given in statutory guidance.

37. Accommodation provided to meet the duty in 27 above will be required to meet the standards in the Homelessness (Suitability of Accommodation) (Wales) Order 2006.
Discharge of Second Stage main duty into the Private Rented Sector

38. The second stage can be brought to an end where the applicant is made an offer of an assured or assured shorthold tenancy from a private landlord provided that the tenancy is for at least 12 months, or where the applicant is willing to accept an offer of less than 12 months, but at least 6 months.

Intentional Homelessness

39. From April 2019 a local authority may not determine that an applicant is homeless intentionally if their household comprises one or more persons under the age of 18, including those comprising only 16 and 17 year olds.

40. A local authority will have discretion to apply the test of intentionality, subject to criteria which will be published in statutory guidance.

Conclusion

41. This paper has set out, as the basis for further discussion, the background to and more detail on the proposals for new legislation on homelessness. The timetable for preparing the draft legislation is tight. The next 6-7 weeks are crucial to shaping the final legislative proposals. In addition to considering responses to this paper, the Welsh Government is committed to further discussion with stakeholders as part of this process.

September 2012
# THE WHITE PAPER & HOMELESSNESS – TAKING THINGS FORWARD

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<tr>
<th>Agenda</th>
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<tr>
<td>1.</td>
<td>Arrival (tea and coffee available)</td>
<td>Welsh Government</td>
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<td>2.</td>
<td>Welcome and Introductions</td>
<td>Welsh Government</td>
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| 3.     | **Response to the White Paper – next steps** – Following on from the consultation responses, Tamsin Stirling/Ceri Breeze, (Welsh Government), will give an overview of the responses and discuss the next steps | Tamsin Stirling (Cardiff/Wrexham)  
Ceri Breeze (Rhosmaen) | 10.35 |
| 4.     | **The Housing Solutions Model – How it will work in practice** – Peter Mackie, (Cardiff University), presents the research team’s views on how the legislation is intended to work in practice including practice examples | Peter Mackie             | 11.00 |
| 5.     | **Break** (to include tea and coffee to take into discussion group)       |                          | 11.30 |
| 6.     | **Discussion Groups** – Statutory and Voluntary Sector organizations split to discuss details around the legislation proposals | Group                    | 11.40 |
| 7.     | **Lunch**                                                                  |                          | 1.00pm|
| 8.     | **Responding to Proposals** – Chris Price (WLGA) feeds back on the consultation he has undertaken with local authority managers on what they will need to do to make the proposals work effectively | Chris Price              | 1.45pm|
| 9.     | **Discussion Groups** – Mixed groups discuss how they can work in partnership to take the proposals forward to effectively prevent and manage homelessness in Wales | Group                    | 2.15pm|
| 10.    | **Closing Words**                                                         | Welsh Government         | 3.20 pm|
| 11.    | **Finish**                                                                |                          | 3.30pm|