

**Senedd Local Government  
and Housing Committee  
Inquiry on housing support  
for vulnerable people  
Crisis response: February 2025**



### **About Crisis**

Crisis is the national charity for people facing homelessness across Wales, Scotland and England. We know that homelessness is not inevitable, and we know that together, we can end it.

We provide services directly to people experiencing homelessness, carry out research into the causes and consequences of homelessness, and campaign for the changes needed to end it.

Our South Wales Skylight provides direct one-to-one support to people who are at risk of or experiencing homelessness in Swansea, Neath or Port Talbot. We help our members find safe and affordable homes and support with accessing benefits, healthcare services and employment opportunities. We also offer a range of learning, social and wellbeing opportunities.

Our Wales Policy team works closely with Members of the Senedd from all parties, contributes to working groups and advisory groups, responds to consultations and calls for evidence, and connects with policy teams in other organisations in Wales.

Our Best Practice team works with local authorities, third sector partners, businesses and other organisations on a range of homelessness projects across Great Britain to identify, test and promote ways of ending homelessness.

We are passionate about working collaboratively across the sector to seek positive policy solutions to help end homelessness in Wales.

### **About this response**

This response has been written by our Wales Policy team, with input from Crisis members who have lived experience of homelessness and the South Wales Skylight staff team

Whilst Crisis' frontline service is not funded by the Housing Support Grant, we are aware that HSG plays a vital role in enabling public and third sector housing support services across the country to prevent and end homelessness.

### **Inquiry terms of reference: Crisis response**

#### **1. How effectively the Welsh Government is planning for the future of HSG in light of rapid rehousing transition and the forthcoming Homelessness Bill**

We appreciate the Welsh Government's investment in HSG through the recent draft budget; however, we worry about the impact of rising costs on vital services and believe that greater investment is needed across housing and homelessness prevention as well.

## Housing Support Grant

Many services accessing this fund have been under constant pressure over the last decade, and under the added strain of the current cost-of-living crisis, the sector has been facing ever-increasing pressures as both running costs and demands for services have increased.

Crisis supports the Cymorth Cymru and Community Housing Cymru [Housing Matters campaign](#), which makes clear the significance of investment in HSG. It highlights that every £1 invested in Housing Support Grant services delivers a net saving of £1.40 for other public services in Wales.

Following a previously frozen budget and campaign, the uplift to the Housing Support Grant last year was welcome and helped to address concerns raised by a number of services around real living wage for staff. However, as the cost of running services rises and more people in Wales face homelessness and require support from services, it is imperative that the Welsh Government invests further in HSG. To this end, the £21million uplift in the December draft budget was warmly welcomed.

However, as services now face increased pressure with new requirements on National Insurance Contributions, many commissioners will now be in the unfortunate position of needing to utilise increases to address these costs – Crisis is aware of concerns that, without taking such action, the increased National Insurance Contributions threaten the continuation of services. Indeed, Cymorth Cymru reports that on average the increase will amount to £120,162 for its service providers, with one service provider quoting £621,000. These increased costs will, again have an impact on services' ability to meet rising demand and to retain skilled workers by paying the real living wage.

As Wales moves towards a Rapid Rehousing approach, our frontline services will play a crucial role in supporting people out of homelessness and into homes and it is imperative to continue to invest in the HSG.

## Homelessness Prevention Grant

To truly transition to a rapid rehousing approach and effectively implement anticipated new homelessness legislation on ending homelessness, it will be important to complement investment in HSG with investment in homelessness prevention. This budget line was flatlined in the Welsh Government's most recent draft budget.

Amidst the cost-of-living crisis and with homelessness at record levels, we must implement new legislation to improve the way that homelessness is relieved in Wales and drive homelessness prevention further upstream to reduce homelessness presentations in the future.

This will not only prevent the significant personal trauma homelessness causes for individuals and families but would also make cost savings across public sector spending.

There is a wide range of research demonstrating the increased health and social care needs among people experiencing homelessness, including evidence specific to Wales.<sup>1</sup>

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<sup>1</sup> For example: Song, J., Moreno-Stokoe, C., Grey, C., Davies, A., (2021) [Health of individuals with lived experience of homelessness in Wales, during the COVID-19 pandemic](#). Public Health Wales.

Without investing in homelessness prevention, we place additional cost pressures on our health and social care sector.

Therefore, investment in prevention addresses both the human cost of homelessness and the wide and long-term financial cost to the public purse.

Beyond the anticipated new legislation, we know that the Homelessness Prevention Grant is used to fund advice services across all local authorities in Wales<sup>2</sup>, as well as many other key projects.

We urge the Welsh Government to consider investment in this area as a key part of current homelessness support provision, as well as a vital part of future cost savings to health, social services and the wider public purse.

### **Social Housing Grant and the Transitional Accommodation Capital Programme**

It is critical that the HSG sits alongside a healthy budget for increasing levels of affordable homes in Wales. These homes are needed to move people on from support services and to reduce homeless caseloads.

The Welsh Government's recently announced £81 million investment in the Social Housing Grant and Transitional Accommodation Capital Programme is welcome; however, it is important to highlight that the findings of the Audit Wales report<sup>3</sup> suggests that an even greater level of funding will be required to meet the Welsh Government's target of delivering 20,000 new social homes.

Investing in social housing and ensuring there are suitable homes for people to move into is a critical part of Wales' journey towards a rapid rehousing approach and the broader legislative reforms which aim to make homelessness rare, brief and un-repeated. We urge that the Welsh Government continues to seek ways to invest in the SHG.

TACP funding plays a crucial role in providing more suitable interim accommodation and decreasing the numbers of individuals in temporary accommodation. However, over time, we would expect investment in this area to decrease, while SHG funding should increase further to provide more permanent housing solutions. It is essential that Rapid Rehousing Transition Plans (RRTPs) and local planning processes fully account for this shift, ensuring that this forms part of strategic planning efforts.

### **2. Current and anticipated pressures in the delivery of HSG-funded support services, including pressures on the workforce;**

As explored above, there are many pressures on the delivery of HSG-funded support services, and these pressures only seem to be growing.

For example, these pressures include supporting increased caseloads, increased running costs of services as a result of the cost of living, and struggles affording to pay at least the real living wage in order to protect and retain skilled workers. In addition, the changes to employer National Insurance Contributions announced in the UK Chancellor's Autumn Budget will incur significant additional costs for homelessness support providers, and

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<sup>2</sup> Shelter Cymru (2025) [Investing in ending the housing emergency: does the draft budget go far enough?](#)

<sup>3</sup> Audit Wales (2024) [Affordable housing](#)

many organisations across the sector are concerned about how they can absorb these costs.

Again, we support the [campaigning of Cymorth Cymru and Community Housing Cymru](#) on this matter.

### 3. How much is known about service performance, including data on outcomes

Crisis welcomes the introduction of the Housing Support Grant Framework and the connections of data from this framework with the Ending Homelessness Outcomes Framework. However, both of these data systems have only recently been introduced and we have not yet seen the data derived from the Housing Support Grant Framework. Given that our services are not HSG funded we are unable to comment on the collation of this data.

### 4. How effective is joint working between housing support services and public services such as health and social care;

It is clear that, for many, homelessness interconnects with other factors – leaving care, facing mental health difficulties, fleeing abuse, and leaving prison are just a few of the trigger factors that can push a person into homelessness. The stresses and strains of experiencing homelessness can also cause further matters to arise – for example a person's physical and mental health is often exacerbated when living out the trauma of homelessness.

It is, therefore, important to consider homelessness as more than a housing issue. If we are to truly move homelessness prevention upstream, we must work across agencies to identify risks of homelessness at the earliest opportunity. And if we are to support people out of homelessness and to retain tenancies, we must also look holistically at their support needs, again working across agencies.

Unfortunately, as was strongly reflected through the work of the [Expert Review Panel](#), there are currently significant barriers in effective joint working structures.

In 2022-23, Crisis co-ordinated and contributed to the [Expert Review Panel](#) which considered how legislative change could help to end homelessness in Wales and informed the writing of the Welsh Government's Ending Homelessness White Paper.

The panel's membership consisted of representatives from local government, housing associations, third sector homelessness and equality organisations as well as experts from academic and legal fields. Its work involved detailed evaluation of current legislation based on research from across the UK and other nations, engagement with 300 people with lived experience of homelessness in Wales, and consultation with public and third sector professionals in the following fields: housing and homelessness; health and inclusion health; disability/disabled people's rights; social services; children's rights; criminal justice; violence against women, domestic abuse and sexual violence (VAWDASV); housing support for ex-service personnel.

The panel heard a strong message from housing workers that they needed greater co-operation from other agencies – both in terms of early referrals and in relation to securing support needed for an individual. This message was strongly echoed by experts by

experience who emphasised the need for greater collaboration between services, and the need for this collaboration to extend beyond referral stage.

We know that there are some good examples of joint working that take a progressive approach towards preventing homelessness across the public sector. However, during stakeholder engagement conducted on behalf of the Panel, we heard from professionals that where things are working well, this is often due to the personal passion of certain post holders and ways of working are not consistent across Wales.

### **Feedback from members at Crisis Skylight South Wales**

To inform our response to the Welsh Government's White Paper on Ending Homelessness, we asked Crisis members in a survey:

*"In your experience, how good are public services in working together to provide support to people who are at risk of or experiencing homelessness?"*

They could rate the following services 'very good', 'good', 'fair', 'poor' or 'not applicable':

- social services
- A&E department at the hospital
- other department at the hospital
- midwife services
- GP/doctor
- NHS mental health services
- probation service
- police
- prison service
- Job Centre Plus
- drug and alcohol services

Feedback on all of these public services was variable, with every single service receiving both positive and negative responses. This reinforces the evidence of inconsistency across public services and the variation within each public service, demonstrating the need for a more consistent approach across Wales.

In particular, Crisis members reported the need for more joined up working with job centres, probation services and better access to mental health services, as well as health services generally.

For example, one member said their GP practice told them they could no longer see them when they became homeless because the homelessness shelter they were sleeping in was not in the surgery area.

Other members emphasised that, where there is a lack of co-ordination between services, people are often asked to repeatedly share the same details of their history, current situation and support needs with multiple professionals. This can be retraumatising.

Another theme reported by our members, and by experts by experience within the panel work, is that it can be difficult to navigate support across different agencies. In particular, we hear that people face long waits for mental health support, during which their housing situation can worsen. We also heard that people can struggle to access support

for a dual mental health and substance misuse issue, despite the often interlinked nature of these difficulties.

In our survey, we also asked Crisis members how working across public services could be improved. A key theme was improvement of communication and information sharing between public services:

*"Communication is key and needs to be improved."*

*"I think doctors and the job centre should be more effective when passing information on to housing options so they can process peoples applications more fairly"*

*"They [Housing Options] should work closer with medical/ health staff to get medical evidence."*

### **Feedback from staff at Crisis Skylight South Wales**

Our members often find it difficult to access social care and safeguarding assessments.

We understand that due to the high demand on services the threshold to access this support is high; however, without the skills and resources of these specialist services, it is difficult for to access preventative support.

Many of our members are deemed "not complex enough" or "not in enough of a crisis" to be eligible for mental health support, but too complex to access domestic abuse support and/or a refuge. This means they are stuck in an uncertain limbo, where without these supports they are likely to develop further complexity of need.

One particular aspect of this problem relates to the vulnerability assessment required by the Housing Wales Act 2014, which determines whether or not a person has a priority need for accommodation. The Code of Guidance states: "The assessment of vulnerability will need to take into account any medical information given in support of the application. It is for the Local Authority to make any further inquiries it deems necessary with any health professionals involved in the provision of any treatment."<sup>4</sup>

However, we know that this part of the guidance is not always followed, and our members often have to take on the responsibility of chasing their medical records to support their homelessness application. This can be a complex and arduous process which is particularly difficult to navigate for people who are already experiencing the trauma and chaos that comes with experiencing homelessness. Better communication between services would prevent this burden falling to the applicant.

Recently, we have also encountered barriers with the new Right Care, Right Person Framework (currently being implemented by a number of police services across Great Britain). While this framework was introduced with the aim of ensuring people can access appropriate care from the right service, we are finding that it is presenting barriers to support where staff have concerns about our members' wellbeing and/or fear they may be at risk of mental health crisis.

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<sup>4</sup> Welsh Government (2016) [Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness](#)

## Our project work

Crisis is involved in a number of different projects which seek to support practices to help end homelessness. Often multiagency working is a key linchpin to such work.

We often encounter key barriers around the ability to share data and information across agencies as well as different organisations holding different Key Performance Indicators, which drive their organisational aims. We believe greater consideration in these areas would be helpful in improving effective multi-agency delivery.

## The White Paper on Ending Homelessness

The Expert Review panel made key recommendations around introducing new public sector duties to help identify, act, refer and co-operate where a person is at risk of or experiencing homelessness, with a view to assisting greater collaboration between services. Crisis was pleased to see this recommendation reflected within the Welsh Government's White Paper on Ending Homelessness and, as identified within the summary of consultation responses, that this proposal has attracted wide-ranging support.<sup>5</sup>

It will be important to press ahead with introducing these new duties. It will also be important to explore further how these new duties can be implemented effectively across different organisations, looking at clear information on what actions organisations can take, how awareness of homelessness and the new duties can be raised across organisations, and how these duties can be supported by existing systems and structures.

We are also pleased that the White Paper on Ending Homelessness recognised the need for a case co-ordination approach for people who have complex support needs, with the service equipped with the expertise most suited to meeting the individual's needs taking the lead in meeting those specific needs. We feel that this approach is another key solution to improving joined up working to prevent and end homelessness.

However, we would urge the Welsh Government to reconsider the suggestion that this approach is only used when an individual requires input from three public services. We are concerned that requiring input from three services to warrant a case co-ordination approach will exclude a significant number of people, and potentially exclude those most in need of this approach. Some Crisis members do not engage with certain services due to a lack of trust and/or because of a difficult experience with the service in the past. The higher the complexity of needs, the more likely this is to be the case, so the need for three services could exclude these members most in need of this coordinated approach.

### **5. What services should be commissioned in future to effectively support people with complex needs to find and keep a home.**

A significant part of the Welsh Government's Ending Homelessness Action Plan is the commitment to delivering a Rapid Rehousing (RRH) approach to ending homelessness, which ensures that individuals experiencing homelessness are quickly moved into stable accommodation. A key aspect of this approach is providing comprehensive, wraparound support for those with more complex needs.

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<sup>5</sup> Welsh Government (2024) [Consultation Analysis for the White Paper on Ending Homelessness in Wales](#)

At our South Wales Skylight, more and more people with complex support needs are approaching us for support because they are unable to access the specialist support they need. This is also being reported by other organisations across the sector.

Prolonged stays in unsuitable temporary housing are causing people to develop more complex needs, and we know that this situation is not likely to improve in the near future, given the shortage of affordable housing across Wales. During stakeholder engagement conducted on behalf of the Expert Review Panel, we heard many cases where people requiring support from more than one public service were “ping-ponged” between different services, with no service assuming a lead on their support. This often meant that people who had experienced trauma were at risk of re-traumatisation as they had to repeatedly share the same details of their history, current situation and support needs with multiple professionals.

During the Expert Review Panel stakeholder engagement, stakeholders raised that a key enabler of joint working between different services is the co-location and of co-funding of services.

One Crisis member said:

*“An integration of services throughout all sectors including mental health, physical health, addiction services, DV & SV services, police & probation, homelessness, training & employment, treatment and therapy etc... The treadmill of trauma that is currently available blatantly isn’t working.”*

We appreciate the Ending Homelessness White Paper’s commitment to consider possible co-funding of multi-disciplinary homelessness and housing support teams with dedicated mental health expertise, co-location of services, or pathways that enable swift access to NHS mental health services for people experiencing or at risk of homelessness. This would certainly assist with collaboration across some of the key services accessed by people experiencing homelessness and would complement the ethos behind the new public sector duties.

We understand that the Welsh Government is looking to Cardiff and Vale Health Inclusion Service as an example of good practice in this area, as well as the work of the national health and homeless charity, Pathway. We consider that it would be helpful to consider how learnings from these areas could inform improved practice across the country.

In addition, Crisis is also an advocate for the increase of Housing First projects in Wales. Housing First has proved to be a highly successful approach to meeting the needs of people with complex needs and this should form a key part of the Welsh Government’s wider work in moving towards a rapid rehousing approach.

As well as commissioning these types of services, Crisis would emphasise the importance of the aforementioned proposed legislative changes around wider public sector duties for preventing homelessness and case co-ordination as enablers for the success of these services.

In addition, we would draw attention to the Expert Review Panel’s recommendation for the establishment of new Joint Homelessness Boards, which would help to monitor whether services are working collaboratively to resolve homelessness, discuss complex



cases, share existing good practice, and investigate where there are incidents of a serious nature.<sup>6</sup>

Crisis is pleased that the Welsh Government supports the principle of this recommendation and understands the position outlined in the White Paper, which is to explore how existing partnership functions or boards might be able to deliver these policy aims. However, we are aware that existing Regional Partnership Boards do not currently provide adequate space for detailed planning of support for those experiencing or at risk of homelessness.

To facilitate effective oversight within health settings, we would also welcome further consideration of the panel's recommendation on identifying homelessness leads in each health board.

### **More information**

Thank you for reading this response. For further information, please email Jasmine Harris, Senior Policy and Public Affairs Officer: [Jasmine.Harris@crisis.org.uk](mailto:Jasmine.Harris@crisis.org.uk)

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<sup>6</sup> Expert Review Panel (2023) [Ending homelessness in Wales: a legislative review](#), p.64.