

POLICY AND RESOURCES SCRUTINY COMMITTEE – 13TH NOVEMBER 2018

SUBJECT: HOMELESSNESS STRATEGY AND ACTION PLAN 2018-2022

REPORT BY: CORPORATE DIRECTOR OF SOCIAL SERVICES AND HOUSING

1. PURPOSE OF REPORT

1.1 To request that Members provide their views on the Gwent Regional Homelessness Strategy 2018-2022, prior to the report being presented to Cabinet to request its approval.

2. SUMMARY

2.1 The Housing (Wales) Act 2014 requires all Welsh local authorities to undertake a review of their homelessness services and produce a four year homelessness strategy to address the issues identified. The five local authorities in Gwent have responded to the requirement by working together to produce a regional strategy, delivered through local and regional action plans. A regional approach was approved by Welsh Government and this takes into account the need to consider more partnership and cross boundary working. The strategy has been developed from the findings of an extensive regional consultation and review. Local Authorities across Wales are required to implement their homelessness strategies by 31 December 2018.

3. LINKS TO STRATEGY

- 3.1 The <u>Housing (Wales) Act 2014</u> requires all Welsh local authorities to undertake a homelessness review and produce a four year homelessness strategy
- 3.2 Well-being Goals within the Well-being of Future Generations Act (Wales) 2015:

A prosperous Wales* P2: Improve standards of housing and communities, giving appropriate access to services across the county borough

- A resilient Wales
- A more equal Wales
- A Wales of cohesive communities
- A globally responsible Wales

<u>Improving Lives and Communities: Homes in Wales 2010</u> which sets out the national context on meeting housing need, homelessness and housing related support services.

Caerphilly Homes Service Plan (2018-2023) Priority Objective 7.

<u>Caerphilly CBC Equalities and Welsh Language Objectives and Action Plan 2016-2020:</u> Objectives 1,3,4,5,6,7,8 and 9.

- 3.3 **Corporate Plan (CCBC, 2018-2023): Well-being Objective 3**: "Address the availability, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's well-being."
- 3.4 The Caerphilly We Want (CCBC, 2018-2023) Well-Being Plan: Positive Places Enabling our communities to be resilient and sustainable.

4. THE REPORT

- 4.1 Preventing and addressing homelessness remains a high priority for the Welsh and Local Governments in Wales. The Housing (Wales) Act 2014 requires all Welsh local authorities to undertake a homelessness review and using the results, produce a four year homelessness strategy to be operational by 31 December 2018 (see Sections 50-2 of the Act). This document reviews homelessness in five local authority areas:
 - Blaenau Gwent County Borough Council
 - Caerphilly County Borough Council
 - Monmouthshire County Council
 - Newport City Council
 - Torfaen County Borough Council
- 4.2 Each of the five authorities has worked together to take both a regional and local approach to this work. As well as making better use of resources, it is anticipated a broader view will help create further opportunities for working together in the future, supporting consistency and quality in the delivery of homelessness services across the region. An extract of the Gwent Homelessness Review 2018 is attached at Appendix 1, which defines the scale of the issue across the region and within Caerphilly. A full copy of the review will be placed on the Members' Portal and made available in the Members' Library. The reviews analyse the nature and extent of homelessness in Gwent, specifically covering:
 - The wider environment that homelessness services operate within.
 - The accommodation in place to prevent and alleviate homelessness.
 - Demand for homelessness services and trends past, current and estimated future levels
 of homelessness.
 - The main causes of homelessness.
 - The resources currently in place to prevent homelessness and support those who are homeless and possible gaps.
 - Potential areas of improvement.
 - The resources used to deliver statutory homelessness services.
- 4.3 The table below displays the number of households approaching the Gwent local authorities requesting homelessness services. The initial focus is to prevent homelessness but if this cannot be achieved, temporary accommodation is provided and where the household is eligible, in priority need and unintentionally homeless, we secure a housing solution for that household. The data represents a section of the Welsh Government statutory return and shows a general upward trend in the number of households approaching local authorities for homelessness assistance. Of note, 391 additional households approached the homeless service in Caerphilly when comparing the 2016/17 data to the 2017/18 data.

Household Numbers	Blae	nau Gv	went	C	aerphil	ly	Mon	mouths	shire	1	<mark>lewpo</mark> i	rt		Torfaer	1
(i.e. Not	2015-	2016-	2017-	2015-	2016-	2017-	2015-	2016-	2017-	2015-	2016-	2017-	2015-	2016-	2017-
Percentages)	16	17	18	16	17	18	16	17	18	16	17	18	16	17	18
Number of households requesting homelessness assistance	552	651	668	672*	1581	1972	591	744	584	2154	2532	2142	780	1053	1116
Total households whose homelessness was prevented	267	303	289	249	609	571	249	183	255	393	537	461	333	432	427
Total households provided with temporary accommodation because of actual homelessness	132	198	263	288	525	410	96	216	228	537	1107	968	147	315	395
Total households housed by the local authority (where a statutory housing duty existed)	12	21	36	54	81	134	39	36	32	204	180	278	69	66	39
Assistance provided as a percentage of total households approaching homelessness service requesting housing assistance	74%	80%	88%	88%	77%	56%	65%	58%	88%	53%	72%	79%	70%	77%	77%
Not owed any duty to assist (not homeless, not eligible, not in priority need, intentionally homeless)	26%	20%	12%	12%	23%	44%	42%	42%	12%	47%	28%	21%	30%	23%	23%

*Footnote - the number of Caerphilly households requesting homelessness assistance in 2015/16 is considered to be significantly underestimated due to the change to the computerised data recording system during that period.

- 4.4 Using the reviews and strategy, each local authority will produce their own bespoke plans to deliver specific actions to address homelessness in their areas, continuing to engage with partners and stakeholders as appropriate, and anchored to the reviews and strategy. To ensure that sustainability and quality of life factors are optimised, a wellbeing assessment will be undertaken on the action plans in line with the Wellbeing of Future Generations (Wales) Act 2015. The action plans will be reviewed periodically during the lifetime of the strategy (as will the homeless strategy itself) by each local authority, so they remain responsive to emerging needs and trends and the ever changing environment. If any significant changes are required to the strategy, a further report will be submitted to seek Cabinet approval.
- 4.5 The strategy document is attached as Appendix 2 to this report and contains four key priorities and ten strategic objectives. A regional action plan has been developed which in Caerphilly's case, also contains the local actions we intend to deliver through the term of the strategy period. The Gwent Homelessness (Caerphilly) Action plan is attached in Appendix 3.

5. WELL-BEING OF FUTURE GENERATIONS

5.1 This report contributes to the Well-being Goals as set out in Links to Strategy above. It is consistent with the five ways of working as defined within the sustainable development principle in the Act in that:

Long Term – supports the sustainability of cohesive communities for tenants and residents; providing a fair and transparent service for tenancy sustainment.

Prevention – supports tenants and assists in the prevention of eviction and homelessness. It supports the well-being of tenants and residents.

Integration – improved standards of housing and stable community environments.

Collaboration – joined up working arrangements within the organisation and with outside agencies to support tenancy sustainment.

Involvement – Engages tenants, residents and support agencies in relation to sustainment of tenancies.

6. EQUALITIES IMPLICATIONS

6.1 The Equality Impact Assessment for the strategy has been undertaken and is contained in Appendix 4.

7. FINANCIAL IMPLICATIONS

- 7.1 The strategy will be introduced in quarter 3 of this financial year (2018/19) and funding commitments are already in place by way of the Revenue Support Grant. Welsh Government Ministers have announced that there will be a new grant funding system to ring fence funding for Supporting People, Homeless Prevention Grant and Rent Smart Wales enforcement funding. This announcement confirms that financial support will be available to the local authority to enable us to implement the actions identified within the strategy. A separate report has been drafted on the amalgamation of existing grants into two new grants: The Children and Communities Grant and the Housing Support Grant. That report requests recommendations on governance of both grants moving forward.
- 7.2 Statutory Homelessness schemes currently receiving Supporting People funding will be unaffected by the costs of funding the strategic actions identified, which will be reviewed annually.

8. PERSONNEL IMPLICATIONS

8.1 There are no personnel implications for Housing.

9. CONSULTATIONS

9.1 Consultation responses have been reflected in this report.

10. RECOMMENDATIONS

10.1 Members are asked to provide their views on the Gwent Regional Homelessness Strategy 2018-2022, prior to the report being presented to Cabinet to request its approval.

11. REASON FOR RECOMMENDATIONS

11.1 To comply with the requirements of Section 50 Housing (Wales) Act 2014.

12. STATUTORY POWER

12.1 Housing (Wales) Act 2014.

Author: Sue Cousins, Housing Solutions Manager

(Tel: 01443 873544, Email: cousis@caerphilly.gov.uk)

Consultees: Cllr Dave Poole - Leader of the Council

Cllr. L. Phipps - Cabinet Member for Homes and Places

Cllr S. Morgan - Deputy Leader & Cabinet Member for Economy, Infrastructure,

Sustainability & Wellbeing of Future Generations Champion.

Christina Harrhy - Interim Chief Executive

David Street - Corporate Director of Social Services and Housing

Shaun Couzens - Chief Housing Officer

Robert Tranter - Head of Legal Services & Monitoring Officer

Rhian Kyte - Head of Regeneration & Planning Fiona Wilkins - Housing Services Manager

Lesley Allen - Principle Accountant

Shelly Jones - Supporting People Manager
Claire Davies - Private Sector Housing Manager

Background Papers:

Gwent Homelessness Review 2018 (Copy placed on the Members' Portal and made available in the Members' Library)

Appendices:

Appendix 1 Extract from Gwent Homelessness Reviews 2018
Appendix 2 Gwent Regional Homeless Strategy 2018-2022
Appendix 3 Gwent Homelessness (Caerphilly) Action Plan

Appendix 4 Gwent Regional Homelessness Strategy Equality Impact Assessment

Extract from Gwent Homelessness Strategy 2018

5.22 Key Points:

- The above data has provided a wealth of information into homelessness in Gwent, which helps us to summarise the main themes, trends and higher risk groups moving forward; also what future demand on homeless services should look like over the next four to five years. The main points include:
- Newport has the greatest demand on its homeless services, followed by Caerphilly, Torfaen, Blaenau Gwent and Monmouthshire in that order. That trend is not expected to change during the lifetime of the strategy.
- The levels of successful preventions (section 66) across Gwent appear to be broadly decreasing over the last three financial years. Successful Section 73 outcomes have reduced almost year on year for every Gwent local authority. Based on the data alone, some local authorities may be seeing greater success in discharging their Section 75 duties in some parts of Gwent than others.
- Operating effective 'triage' type systems in providing homeless services and also securing as many successful Section 66 outcomes as possible to prevent escalation to Section 73 and 75 duties is going to be essential in the future. This is especially the case for Newport, where greater proportions of service users are in greater need. Addressing client expectations and encouraging people to help themselves as much as possible will be important.
- It will be imperative for the Gwent authorities to concentrate on co-ordinating access to more temporary accommodation in the region. There is an acute need for appropriate temporary accommodation in Gwent and as is affordable single person accommodation. This will become even more critical when the intentionality test is no longer applied to households with children by 2019.
- Improving systems and support for move on from temporary and supported housing should be a key focus.
- The councils should work together to ensure homeless statistics are recorded in as uniform a way as possible.
- All councils should focus on effective activities that respond to and ideally prevent: breakdowns in relationships, rent
 arrears and loss of rented or tied accommodation. Such factors are also causes of escalating homelessness issues i.e.
 rough sleeping. Sufficient resources should continue to be channelled towards preventing these major causes of
 homelessness.
- Proportionally 16 to 24 year olds are over-represented in accessing homelessness services, as are single person households and males. These cohorts are likely to require additional support from the Gwent local authorities moving forward. In doing so, there is the potential that successful preventative outcomes with these demographics would in-turn save resources to be used on other demographics. Monmouthshire and Torfaen could give additional focus to those

- over 25; and Newport Asian/Asian British and people categorised as 'other ethnicity'.
- Gwent councils and their partners to work together to reduce all use of (B & B going forward.
- Activities that mitigate domestic abuse should be a key focus particularly in households with dependent children in them.
- Prison leavers and those leaving institutions or care are cohorts that are consistently at risk of homelessness and should be focused upon. Prison leavers are especially at risk of rough sleeping. Single households are more likely to be exprisoners and leaving an institution and/or care and also more susceptible to rough sleeping e.g. specialist recovery and rehabilitation programmes, community payback unpaid work, education, training and employment, mentoring and working with families of offenders etc. can be effective.
- Single person households are more likely to see harassment due to a protected characteristic, causing a homeless issue (under the Equality Act 2010). Gwent councils should aim to focus on this issues.
- Housing affordability remains a key issue households with dependent children are considerably more susceptible to rent arrears in both the private and social housing sectors.
- Debt advice, financial payments, resolving benefit issues and resolving rent and service charge arrears are having the most impact in helping households remain it their homes, thereby preventing homelessness in Gwent focus should be expanded in these areas if possible.
- Mediation intervention may be less likely to be effective with younger people and alternatives should be considered going forward.
- Partnership working and sharing best practice is likely to be becoming more important. Any reductions in this area (indeed increases will be needed), would mean that the Gwent councils would likely be at an increasing disadvantage, struggling more and more to cope with rising demand for homeless services (especially Newport). There's the real potential that co-ordinated strength and effectiveness in this area would bolster preventative work, potentially easing pressure on council's homeless services over the next four to five years.
- Each local authority must engage with and work with private landlords to meet their expectations. There will be variation in each local authority because each of the markets differ; supplying incentives are clearly not the only factor at play in successful engagement with the private sector in any of the Gwent authorities. Finding new ways to develop mutually beneficial relationships between councils and private landlords needs to be a key focus (especially in Monmouthshire).
- Social housing appears to be becoming relatively harder to access in Monmouthshire, Newport and Torfaen leading to increased reliance other types of housing such as the private rented sector in Newport. Councils should work with social landlords to reverse this trend.
- People experiencing homelessness repeatedly are far less likely to be living in stable long-term housing.
- Councils will have to increasingly forge links between themselves and social landlords and the private sector during the lifetime of the new strategy with the goal of getting access to more affordable housing, in order to discharge homeless duties.

- There may be potential for local authorities to develop more LCHO schemes. Table 6.2.1 below and the numbers of people asking for more affordable housing to buy, suggests that a considerable proportion of service users would support this.
- Councils should also consider how they record and evidence the preventative work that is undertaken to stop
 homelessness (including in connection with homeless services and related services, such as SP funded services).
 Feedback from council staff would suggest that they routinely offer at least some advice when someone approaches
 them and the household isn't threatened with homelessness within 56 days. There is also recognition that many
 households can find themselves at risk of homelessness through no fault of their own e.g. through a 'no fault' section 21
 notice in the private rented sector. They often have no support needs and with some basic advice they resolve the risk
 themselves.
- Working to understand why service users disengage from services after beginning the statutory process.
- There are a number of different trends in connection with rough sleepers in the Gwent authorities e.g. rough sleepers appear most prevalent in Newport, probably because of its city status. Rough sleeping is also a chronic issue in Gwent 76% of all respondents to the survey have slept out before in the past. Rough sleeping also appears to be more of an issue in Caerphilly, compared to the remaining three Gwent authorities. In Monmouthshire it seems that rough sleepers are less likely to be sleeping rough for shorter periods of time, compared to the other three Gwent authorities. Rough sleepers tend to be male in Gwent, although there are female rough sleepers reported in Newport. People seem less likely to sleep rough on their own in Newport and this may again be linked to its status as a city; perceived or more likely real risk in sleeping out alone.
- The service user survey cited a number of causes linked to homelessness: drug and alcohol abuse, mental health, criminal offending history, discharge from custody, breakdown in relationships, debt and lack of affordable housing, tenancy ending, exclusion from school, unemployment, domestic abuse, poor access to health and social care services, leaving care and sexual and/or physical abuse, living in unsuitable housing due to physical or sensory impairment. This would reinforce what local authority staff said during consultation, that intense and bespoke support in conjunction with the Housing First is essential. This shows why councils must maintain awareness of the services operated by partners and why there must be a wide menu of (person-centred) support provided to address homelessness.
- The service user survey also suggested that some characteristics are a lot more prevalent than others in relation to repeat presenters to homeless services i.e. they are very likely to be single, male and have chronic social and medical issues and/or a disability.
- Further consideration of how households 'eligible, but not in priority need' are assisted and how this is evidenced may also be another area for consideration.

Gwent Homelessness Strategy 2018 - 2022



VISION: Everyone in Gwent has a home to live in and the right support if they need it, to lead a fulfilling life.



MISSION: Work together to overcome homelessness in Gwent.



VALUES: Listening; Collaborative; Innovative and Accountable.



Priority 1: Help

improve access to suitable and affordable housing.

Priority 2: Offer fast and effective advice and support, working with partners to help vulnerable people.

Priority 3: Minimise

Priority 4: Ensure fair, equal and person-centred homeless services.

Strategic Objectives:

Reduce

the number of 'repeat presenters' and rough sleeping.

Reduce

homelessness for younger people and support their wellbeing.

Work with

social and private rented sector landlords to sustain tenancies and increase access to and supply of housing.

Recording and sharing

Maximise

access to a

range of

support.

information between partners, as appropriate, to help service-users.

Increase opportunities

for training and employment for vulnerable people.

Modernise

services to embrace new technologies and ways of working.

> **Increase** joint planning, commissioning and delivery of services.

Raise awareness

of homelessness and services, encouraging self-help and development of resilience.

> Increase prevention work to obtain successful outcomes.











Gwent Homelessness Strategy 2018 –2022 Caerphilly Action Plan

Interim Actions						
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
Establish a project group to steer and move forward the homeless strategy and actions, ensuring that monitoring mechanisms are in place and that links are sustained with key strategic groups and forums across each area and the region as	Provide a strategic steer to homelessness services across the region and then locally	Establishment of regional steering group Secure appropriate chair in order to raise profile of groups Establishment of local	All Homeless Leads All Homeless Leads Housing	January 2019 January 2019 January	Lack of overall co- ordination of service development with the risk of duplication of work, ineffective use of resources and reduction in	
a whole.		steering groups	Solutions Manager Caerphilly CBC (local)	2019	effectiveness of interventions	
		Establish reporting mechanisms and links with relevant groups including PSB	All Homeless Leads	March 2019		
1 Increase prevention w	ork to obtain succes	ssful outcomes				
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
Undertake a review and benchmarking exercise of individual homeless services to compare approaches, identify opportunities to improve, increase consistency and replicate good practice	Increase consistency in service delivery across Wales	Agree key areas to be considered from the review Set work plans based on key areas to be delivered	All Homeless Leads (Regional) All Homeless Leads (regional)	March 2019 May 2019 & Ongoing review	Inconsistent application of legislation and inequality of services	

To introduce a hospital discharge framework across Gwent		Establish Regional hospital discharge framework across Gwent	All Homeless Leads, Social Care and ABUHB (Regional)	Dec 2020	Individuals discharged from hospital inappropriately and placed at significant risk Increased rough sleeping	
To increase the level of engagement of service users in addressing homelessness	Increase in homeless prevention activities and services	Consider the information as to why people disengage from services	All Homeless Leads (Regional)	June 2019	Dissatisfaction with services	
		Review existing process/procedure in light of revised code of guidance issued by Welsh Government and information around disengagement	Housing Solutions Manager Caerphilly CBC (local)	Sept 2019	Services not meeting needs	
		Implement revised process/procedures based on findings and review		February 2020		
Benchmark and compare prevention approaches by each local authority and identify good practice focusing on relationship breakdown, rent arrears and tied accommodation	Increase in homeless prevention activities and services	Analyse information and identify opportunities for improvement Implement identified opportunities as appropriate	All Homeless Leads (Regional) All Homeless Leads (Regional)	June 2019 July 2020	Presentation numbers of clients continues to increase Clients won't get the right services at the right time	

To actively seek to ensure that there is appropriate provisions for households with disabilities	Improve access to services for all service users	Analyse current provision and demand for adapted temporary and permanent accommodation	Housing Solutions Manager Caerphilly CBC (local)	Dec 2019	Inappropriate accommodation provided	
		Identify gaps and develop options for development, reviewing annually		April 2020 & ongoing	Risk of harm to households	
		Consider development of regional approaches to ensure that there is adequate provision of suitable temporary accommodation for households with disabilities	All Homeless Leads (Regional)	April 2021 & ongoing		
Benchmark and compare financial assistance approaches in each local	Increase in homeless prevention activity and options	Benchmark and compare DHP approach	All Homeless Leads (Regional)	June 2019	Presentation continue to increase	
authority used for homeless prevention	οριίστο -	Explore common themes, best practice and take forward recommendations around DHP use	All Homeless Leads (Regional)	Dec 2019	Clients will not receive the right services at the right time	
		Benchmark and compare Prevention Fund and Supporting People Grant programme	Leads (Regional)	June 2019		
		Explore common themes, best practice and take forward recommendations	All Homeless Leads (Regional)	Dec 2020		

		around Prevention Fund use Benchmark and compare Bond Scheme services and 3 rd sector provision	All Homeless Leads (Regional)	June 2020		
Benchmark and compare early intervention, advice and support by each local authority and to identify good	Increase in homeless prevention activity and options	Analyse information and identify opportunities for improvement	All Homeless Leads (Regional)	Sept 2019	Presentations continue to increase	
practice		Implement identified opportunities as appropriate	All Homeless Leads (Regional)	April 2020	Clients won't get the right services at the right time	
2 Raise awareness of he	omelessness and se	ervices, encouraging s	self-help and res	ilience		
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To provide clear information on homelessness, homeless prevention, access to accommodation and access to services	Develop effective communications and information for households seeking accommodation	Consult with service users/former services users and partners over the information provided and review information Review information provided and produce appropriate information based on findings in conjunction with service users and key stakeholders	Housing Solutions Manager Caerphilly CBC (local)	July 2019 February 2020	Inappropriate advice provided leading to increased homelessness and a reduction in homeless prevention as a result	
		Consider opportunities for delivery of regional information and guides on homelessness through the Steering Group	All Homelessness Leads (Regional)	June 2020		

To ensure that front line services are responsive and co-ordinated to meet the needs of service users Operating effective 'triage' type systems in providing homeless services and also securing as many successful Section 66 outcomes as possible to prevent escalation to Section 73 and 75 duties is going to be increasingly essential	Increase in homeless prevention activity and options	Review existing provision within Caerphilly across Council services, involving service users where appropriate Explore available options and provide recommendations for implementation of changes as appropriate with key services Implement preferred changes	Housing Solutions Manager Caerphilly CBC (local)	July 2019 October 2019 February 2020 & review annually in April each year	Inappropriate advice provided leading to increased homelessness and a reduction in homeless prevention as a result	
3 Work with social and p	Welsh Government	Tasks	Lead Officer	By When	Risk	Comments
Develop effective mechanisms to maximise the access to affordable housing schemes for households either homeless or faced with homelessness	Development of affordable housing across the region to meet the increased demand in line with projected population growth	Review existing provision in each local area Work across the region to identify regional development requirements and opportunities	Local Strategic Planning, Development and Enabling teams. Housing Solutions Manager Caerphilly CBC (local) All Homeless Leads (Regional)	October 2019 February 2020 & review annually in April each year	Continued failure to meet local and regional social housing demands	

Co-ordinating access to more temporary accommodation in the region	Reduction In the use of B&B accommodation	Review existing provision in each local area	Housing Solutions Manager Caerphilly CBC (local)	Ongoing – Annual Review in January	Lack of supply of suitable temporary accommodation	
		Consider local and regional requirements based on review	All Homeless Leads (Regional)	Ongoing – Annual Review in January	Continued use of B&B accommodation and increased costs to Local Authorities	
		Develop alternative and additional options locally and regionally based on requirements	Housing Solutions Manager Caerphilly CBC (local)	Ongoing – Annual Review in January	Increased negative impact on the health, wellbeing and life chances of households faced with homelessness	
		Develop regional agreement for temporary accommodation provision and access	All Homeless Leads (Regional)	April 2020		
To increase the supply of good quality affordable private rented sector accommodation	Increase in homeless prevention and housing options for households faced with homelessness	Review existing work with PRS across Caerphilly	Housing Solutions Manager Caerphilly CBC (local)	April 2019	Reduction in positive homelessness interventions Increase in homelessness and demand for	
		Consider findings and develop options available tailored to Caerphilly area	Housing Solutions Manager Caerphilly CBC (local)	June 2019	temporary accommodation	

		Develop work across Gwent region with PRS following review to increase Gwent wide engagement and options with the private rented sector	All Homeless Leads (Regional)	June 2020	Increased costs to Local Authorities	
To develop effective strategies, practices and services to tackle evictions from the private rented sector	Increase in homeless prevention and housing options for households faced with homelessness from the private rented sector	Consider work already undertaken across each Local Authority area and review effectiveness, duplication of work and outcomes Consult with private landlords and letting agents around their views and opinions Develop local and potential regional options for greater intervention services and consistency of approaches	All Homeless Leads (Regional) All Homeless Leads (Regional) All Homeless Leads (Regional)	October 2020 February 2021	Reduction in positive homelessness interventions Increase in homelessness and demand for temporary accommodation Increased costs to Council in provision of temporary accommodation services	
To provide appropriate accommodation options for homeless households with physical disabilities	Development and delivery of accessible emergency accommodation for homelessness households	Review current emergency accommodation provisions and assess likely needs based on trends and demands	Housing Solutions Manager Caerphilly CBC (local)	May 2019	Lack of supply of suitable temporary accommodation	

To seek to widen housing options and choices for all single people seeking accommodation across a range of tenures, both emergency and temporary	Reduce number of single homeless people Reduce levels of rough sleeping	Review provision across the region and consider options for shared resources to meet needs across Gwent Identify gaps in provision and develop plan to secure appropriate accommodation to meet needs Examine review findings and extract options presently available to identify gaps Consider the gaps and explore the options available to address these gaps Develop options based on the above, seeking funding where appropriate and involving key partners and stakeholders across Caerphilly	All Homeless Leads (Regional) All Homeless Leads (Regional) Housing Solutions Manager Caerphilly CBC (local)	Sept 2020 & review annually May 2019 Oct 2019 Feb 2020 & ongoing	Delayed discharge for hospital or potential unsafe discharges Increased costs to Council in provision of temporary accommodation services Increased risk of more single homeless households, lack of available temporary accommodation and greater costs to provide emergency accommodation	
4 Reduce the number of	 	<u> </u>				
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To improve the availability and access to emergency accommodation provision to address rough sleeping in	Reduction in rough sleeping	Review the existing emergency provision across each Local Authority area and	All Homelessness Leads (Regional)	April 2019	Increase in rough sleeping	

each local area and across the region as a whole		identify shortfalls/demand Explore options available for expanding services to meet the demands in each Local Authority area Consider regional approaches to address increased rough sleeping where appropriate	All Homelessness Leads (Regional) All Homelessness Leads (Regional)	July 2019 July 2020 and Ongoing		
To ensure Extreme Weather Plans are reviewed and are fit for purpose	Reduction in rough sleeping in inclement weather	Review local extreme weather plans in partnership with key stakeholders	All Homelessness Leads (Regional)	June 2019 and annually thereafter	Increase in rough sleeping Increased risk of harm due to adverse weather to rough sleepers	
To develop independent accommodation based projects aimed at addressing the needs of chaotic clients and those rough sleeping	Reduction in rough sleeping	To establish a regional working group on developing projects based on the key principles of Housing First linked to the Housing First Network	All Homelessness Leads (Regional)	February 2019	Increase in rough sleeping	
		Develop and deliver models across each region in partnership with RSL partners to deliver "Housing First" projects Evaluate impact of projects and revise	All Homelessness Leads (Regional) All Homelessness Leads (Regional)	April 2019 April 2020		

		projects as appropriate and required		and ongoing		
To research repeat homeless presentations in order to enable services to respond to the identified issues	To ensure equality of access to service and improve service quality and outcomes	To research repeat presentations and identify local trends and issues	Housing Solutions Manager Caerphilly CBC (local)	June 2020	Increase in homelessness	
		Examine local trends across the 5 Gwent areas and to consider options for addressing repeat homeless presentations	All Homelessness Leads (Regional)	Dec 2020	Increase in rough sleeping	
		Implement options where appropriate and review effectiveness of changes/options	All Homelessness Leads (Regional)	February 2021 and annual review	Increase in tenancy failures	
5 Reduce homelessness	s for younger people	e and support their we	llbeing			
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
Develop education packages and information for young people around housing and homelessness	Reduction in youth homelessness through the Youth Pathway model	Review existing provision across each Local Authority area	Housing Solutions Manager Caerphilly CBC (local)	March 2019	Lack of awareness around housing and homelessness issues leading to increases in homelessness	
		Develop an education package and engage with education services over implementing this within schools and other educational settings in	Social Services leads and SP commissioned services Caerphilly CBC Sue Cousins	June 2019 & Review in June 2020	presentations and young people not being aware of their rights and responsibilities	

		each local authority area				
		Consider options for developing packages that create consistency across the region	All Homelessness Leads (Regional)	June 2021		
Develop effective pre- tenancy training for young people in order to prepare young people for independent living	Reduction in youth homelessness through the Youth Pathway model	Review existing pre- tenancy training available in local area	Social Services leads and SP commissioned services Caerphilly CBC Sue Cousins	March 2019	Increase in youth homelessness and tenancy failures amongst young people	
	Reduction in tenancy failures from young people	Consider options available for reviewing existing provision and in partnership, implement revised programme across Caerphilly area		June 2019 & annual review		
Develop clear pathways for young people leaving care	Reduction in homelessness in care leaving population	Review existing process and procedure, considering guidance, best practice, service user input and relevant legislation Develop and implement	Housing Solutions Manager Caerphilly CBC (local) Housing	Sept 2019	Increase in number of care leavers becoming homeless Failure to meet corporate parenting objectives and	
		revised pathway and identify gaps in best practice to be taken forward	Solutions Manager Caerphilly CBC (local)	January 2020 & Ongoing	responsibilities for care leavers	
Ensure that appropriate support and interventions are in place to help young people to remain in in appropriate	Reduction in youth homelessness through the youth pathway model	Review current support and intervention provisions across each Local Authority area	All Homelessness Leads (Regional)	Sept 2019	Increase in youth homelessness	

accommodation	Reduction in tenancy failure through the youth pathway model	Consider options in light of review and how these could be better joined together and more effective in delivery	All Homelessness Leads (Regional)	January 2020		
6 Increase joint planning						
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To consider the methods and potential benefits of joint funding arrangements linked to the Funding Flexibility	To make best use of resources to tackle homelessness and related issue	Consider the findings resulting from the Flexible Funding pilots	All Homelessness Leads (Regional)	Sept 2020	Ineffective use of funding	
arrangements in the development and funding of services		Develop possible options for considering joint funding across the region for services provided	All Homelessness Leads (Regional)	April 2021	Duplication of services and work	
		Seek to secure funding and develop preferred pilot options where appropriate	All Homelessness Leads (Regional)	April 2022		
To deliver joint training around homelessness, homeless prevention and related services across a range of partner agencies	To deliver more joined up, consistent and connected services that meet the needs of service users	Establish Gwent wide training programme for key services and stakeholders	All Homelessness Leads (Regional)	March 2019	Advice and Information provide to service users is not accurate Increase in	
		Deliver training on homeless process across region and locally as required Deliver specific training	All Homelessness Leads (Regional)	June 2019 and ongoing June 2019	homelessness and reduction in effective preventative services	

		in Caerphilly area on process, service access and signposting	Solutions Manager Caerphilly CBC (local)	and ongoing	
		Obtain feedback from agencies and review training programmes	All Homelessness Leads (Regional)	March 2020 & ongoing	
To develop greater co- operation arrangements under Section 95 of the Housing (wales) Act 2014	To deliver more joined up, consistent and connected services that meet the needs of service users	To develop local agreements with partner RSLs To develop partner arrangements with Health across the region in relation to homelessness	Housing Solutions Manager Caerphilly CBC (local) All Homelessness Leads (Regional)	June 2019 and ongoing June 2020	Ineffective working practices. Increase in homelessness Unsafe hospital discharge arrangements Inappropriate accommodation placements and risks for both the public and the individual
To provide greater understanding of the journey through homeless services	To deliver more service user focused services that are more consistently applied	Identify a cohort in each of the authority areas and track them through the homeless process Assess effectiveness of this, identifying gaps, duplication and cost effectiveness of services Develop options for	All Homelessness Leads (Regional) All Homelessness Leads (Regional) All Homelessness Leads (Regional)	March 2021 June 2021	Ineffective use of funding Duplication of services and work

		different models of service delivery and pilot these in each area or as appropriate		August 2021		
To ensure that relevant legislation is fully integrated and taken into account in homelessness assessment policies and procedures	To ensure services are legally compliant	Review homelessness procedures and processes to ensure compliance Implement revisions and provide appropriate training for staff with an annual review as required	Housing Solutions Manager Caerphilly CBC (local) Housing Solutions Manager Caerphilly CBC (local)	April 2020 & ongoing	Advice and Information provide to service users is not accurate Increased legal challenge on decision issued leading to increased staff time being diverted to reviews of decisions Increased use of temporary accommodation and associated costs Need to identify funding streams where new services need to be developed	
To review and develop working practices and processes with key partner agencies – Health, Probation, Social Services, RSL's	To increase partnership working and improve access to services for homeless households	Develop agreements with RSL partners around homeless prevention and associated activities linked to securing accommodation	Housing Solutions Manager Caerphilly CBC (local)	Sept 2019	Increased tenancy failure from Social Housing	

To review and develop Multi Agency Public Protection Arrangements across Gwent	To deliver effective multi agency working arrangements for high	Develop agreements with Probation around homeless prevention, assessment and interventions for individuals leaving the secure estate in line with the National Offender Pathway Review and revise local working arrangements with Social Services Review local agreements across Gwent and consider options for merging arrangements where appropriate Review MAPPA working arrangements across Gwent and implement	Housing Solutions Manager Caerphilly CBC (local) Housing Solutions Manager Caerphilly CBC (local) All Homelessness Leads (Regional) All Homelessness Leads (Regional)/ Gwent MAPPA	Sept 2019 Sept 2019 April 2020 April 2020	Increased homelessness Increased community risk Delays in rehousing through lack of coordination of support Increased community risk from/towards	
in partnership with statutory agencies and agencies with a duty to co-operate 7 Maximise access to a	risk offenders	these as appropriate	Co-ordinator		MAPPA offenders	
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To enhance the work of voluntary groups and services across Gwent that is provided to vulnerable households	To maximise the support and services available to individuals faced with homelessness	Develop a greater understanding of all local services provided for vulnerable households, what services are	Housing Solutions Manager Caerphilly CBC (local)	Dec 2019	Duplication of work Ineffective use of resources	

		delivered and how they are funded Review this information across Gwent and explore options for how this could be better coordinated and supported Produce a directory of voluntary services for use across Gwent	All Homelessness Leads (Regional) All Homelessness Leads (Regional)	February 2020 Sept 2020		
To seek to manage and mitigate against the impacts of Universal Credit	To seek to reduce poverty, hardship and homelessness	Review demand for financial inclusion/debt advice services across Gwent Examine options for increasing capacity and joint working across Gwent Pilot possible options and evaluate outcomes and benefits Ensure homelessness is raised as a key issue in Anti-Poverty work in each Local Authority	All Homelessness Leads (Regional) All Homelessness Leads (Regional) All Homelessness Leads (Regional) All Homelessness Leads (Regional)	Dec 2020 April 2021 & annual review Dec 2019 & ongoing	Increased homelessness presentations Increased cost to Local Authorities Universal credit – regional information on web with partners. Reduce duplication.	

To seek to further integrate Supporting People services at the heart of homeless prevention provision	To create greater connectivity between Support and homeless prevention, increasing the effectiveness of services overall	Develop specific training around homeless prevention for support workers in each local authority area Seek to develop local information sharing arrangements in line with GDPR in order to aid the facilitation of greater joint working and integration of services/outcomes To examine models of co-working/co-funding to deliver services more effectively	All Homelessness Leads (Regional) Housing Solutions Manager Caerphilly CBC (local) Housing Solutions Manager Caerphilly CBC (local)	July 2019 & ongoing May 2019 February 2020 & ongoing	Increased homelessness presentations Potential loss of funding to SP programme through lack of evidence in homeless prevention agenda	
To provide easy access to debt and money management services Debt and money management - households with dependent children in them are considerably more susceptible to rent arrears in both the private and social housing sectors.	To seek to reduce poverty, hardship and homelessness	Review current provision and access arrangements Obtain views from service users and key agencies around services Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies	Housing Solutions Manager Caerphilly CBC (local)	March 2020 Sept 2020	Increase in homelessness presentations Inability to financially sustain tenancies	

		Consider the services across each Local Authority and how these could be better integrated	All Homelessness Leads (Regional)	May 2021		
To provide an appropriate range of support services for individuals with mental health issues	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements Obtain views from service users and key agencies around services Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies Consider the services across each Local Authority and how these could be better integrated	Housing Solutions Manager Caerphilly CBC (local) All Homelessness Leads (Regional)	March 2020 Sept 2020 February 2020	Increase in homeless presentations from individuals with mental health issues Increased costs to agencies in addressing acute mental health issues	
To provide an appropriate range of support services for individuals with drug and alcohol issues	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements Obtain views from service users and key	Housing Solutions Manager Caerphilly CBC (local)	March 2020 Sept 2020	Increase in homelessness presentations Increased costs to statutory agencies	

		agencies around services Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies	All Homelessness Leads (Regional)	February 2020	in addressing health and wellbeing issues as a result of chronic alcohol/drug abuse	
		Consider the services across each Local Authority and how these could be better integrated	All Homelessness Leads (Regional)	June 2020		
To provide an appropriate range of support services for individuals fleeing domestic abuse	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements Obtain views from service users and key agencies around services	Housing Solutions Manager Caerphilly CBC (local)	March 2020 Sept 2020	More significant adverse effects on individuals feeling domestic abuse Increased risk of harm to victims of abuse	
		Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies		February 2020		
		Consider the services across each Local Authority and how these could be better	All Homelessness Leads (Regional)	June 2020		

		integrated			
To provide an appropriate range of support services for individuals being discharged from custody	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements Obtain views from service users and key agencies around services	Housing Solutions Manager Caerphilly CBC (local)	March 2020 Sept 2020	Increase in homeless presentations Increase in rough sleeping Increased community risks and impact on wider community
		Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies		February 2020	
		Consider the services across each Local Authority and how these could be better integrated	All Homelessness Leads (Regional)	June 2020	
To ensure that services are accessible to all households irrespective of their particular needs and backgrounds	To provide equality of access to services	To undertake a review of services and how these are accessed, including a potential mystery shopper survey	All Homelessness Leads (Regional)	Dec 2020	Increase in homeless presentations Ineffective use of resources
		Explore findings and make recommendations across each area for service improvements where required	All Homelessness Leads (Regional)	June 2021	Inequality in service delivery

To provide access to appropriate mediation services to prevent homelessness and tenancy failure	Increase in the homeless prevention activity and positive outcomes	To undertake a review of the mediation services provided and explore possibilities for different delivery models, taking into account the funding used for schemes	All Homelessness Leads (Regional)	Sept 2020	Increase in youth homelessness Ineffective use of funding Duplication of services
		Consider options and make recommendations in light of findings	All Homelessness Leads (Regional) All Homelessness	Feb 2021	
		Implement preferred options	Leads (Regional)	June 2021	
To provide an appropriate range of support services for refugees and asylum seekers	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements	Housing Solutions Manager Caerphilly CBC (local)	March 2020	Increase in homeless presentations Increase in rough
		Obtain views from service users and key agencies around services	(.003.)	Sept 2020	sleeping among refugees
		Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies		February 2020	Lack of community cohesion and impact on wider community
		Consider the services across each Local	All Homelessness Leads (Regional)		

		Authority and how these could be better integrated		June 2020	
To provide an appropriate range of support services older persons at risk of homelessness	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements Obtain views from service users and key agencies around services Make recommendations based on the findings and implement these where appropriate and practicable to do so in partnership with relevant agencies	Housing Solutions Manager Caerphilly CBC (local)	March 2020 Sept 2020 February 2020	Increase in homeless presentations Increase in risk to health and wellbeing of older persons Increased costs in health care
		Consider the services across each Local Authority and how these could be better integrated	All Homelessness Leads (Regional)	June 2020	
To provide a co-ordinated approach to delivering support to families and expectant parents	To ensure appropriate support is provided to a range households in order to prevent or relieve homelessness	Review current provision and access arrangements Obtain views from service users and key agencies around services	Housing Solutions Manager Caerphilly CBC (local)	March 2020 Sept 2020	Increase in homelessness presentations Increased costs to Local Authorities in provision of services Adverse impact on
		Make recommendations based on the findings	All Homelessness Leads (Regional)	February 2020	children's health, wellbeing and

To ensure homelessness services are aligned with the expectations of the Gwent Safeguarding Board	To ensure appropriate support and safeguards are in place to a range of	and implement these where appropriate and practicable to do so in partnership with relevant agencies Consider the services across each Local Authority and how these could be better integrated Review existing safeguarding procedures within each Local Authority and Gwent	All Homelessness Leads (Regional)	June 2020 Aug 2019	education	
Carogadianing Bodia	households in order to prevent or relieve homelessness	protocols. Ensure staff are provided with appropriate training	All Homelessness Leads (Regional)	Aug 2019 and ongoing		
8 Increase opportunities	for training and em	ployment for vulnerab	le people			
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To create opportunities for training and employment for the most vulnerable in society including those who are homeless or at risk of being homeless	To increase training, education and employment opportunities to reduce poverty and increase financial capacity of households	Examine current provisions and to establish the gaps in services alongside opportunities	Housing Solutions Manager Caerphilly CBC (local)	April 2020	Increased social exclusion Increase in homelessness	
		Develop local partnerships to increase capacity and to increase opportunities	Housing Solutions	July 2020 & ongoing		

			Manager Caerphilly CBC (local)			
9 Recording and sharing information between partners, as appropriate, to help service-users						
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To ensure that services comply with the requirements of GDPR in day to day service delivery	To ensure services are legally compliant	Review existing arrangements in place under WASPI and make appropriate changes to ensure compliance	Housing Solutions Manager Caerphilly CBC (local)	May 2019	Failure to meet legal requirements and obligations	
To ensure that case recording systems and subsequent performance information are robust	To ensure the data provided and case recording systems are robust and can be used to inform service delivery, shape policy and inform demand	Review case recording system, database information and reporting system Consider outcomes of review and implement recommendations	Housing Solutions Manager Caerphilly CBC (local)	April 2020 October 2020	Failure to meet legal requirements and obligations Failure to be able to accurately record outcomes and data required by Welsh Government	
		Compare systems and data recording across Gwent in order to develop common frameworks and consistency in recording including supporting people funding services	All Homelessness Leads (Regional) All Homelessness Leads (Regional)	January 2021	Inability to accurate assess demand for services	
		Provide training to staff and implement framework		April 2021		

To develop local information on service demands, performance and delivery to demonstrate service pressures and effectiveness of provision	Increase the local knowledge of service demands and pressure to inform future service delivery	Develop key reports and information from Caerphilly Council's database relating to Homelessness, Support and Temporary Accommodation	Housing Solutions Manager Caerphilly CBC (local)	Dec 2020	Failure to be able to accurately record outcomes and data required by Welsh Government Inability to accurate assess demand for services	
10 Modernise services t					21.1	
Actions	Welsh Government /Review Priorities	Tasks	Lead Officer	By When	Risk	Comments
To ensure services are responsive and effective in addressing local needs through embracing new working practices and technology	Increase the effectiveness and resilience of statutory services provided to homeless households To provide connected customer service information systems in line with the requirements of GDPR	To develop agile working processes and implement this across the Housing Solutions service To review and develop information sharing agreements across partner agencies in line with GDPR	Housing Solutions Manager Caerphilly CBC (local) Housing Solutions Manager Caerphilly CBC (local)	April 2019 May 2020	Increase in homelessness through lack of service user awareness of services Safe use and management of data and information	
		To examine IT system usage and how data and information can be best utilised to improve customer experiences and the effectiveness of service provision	Housing Solutions Manager Caerphilly CBC (local)	May 2021		

EQUALITY IMPACT ASSESSMENT FORM

April 2016

THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

NAME OF NEW OR REVISED PROPOSAL*	Gwent Homelessness Strategy 2018-22
DIRECTORATE	Social Services and Housing
SERVICE AREA	Housing Solutions
CONTACT OFFICER	Sue Cousins
DATE FOR NEXT REVIEW OR REVISION	December 2019

*Throughout this Equalities Impact Assessment Form, 'proposal' is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.



INTRODUCTION

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities and Welsh Language issues have been proactively considered throughout the decision making processes governing work undertaken by every service area in the Council as well as work done at a corporate level.

The form should be used if you have identified a need for a full EIA following the screening process covered in the **Equalities Implications in Committee Reports** guidance document (available on the **Equalities and Welsh Language Portal** on the Council's intranet).

The EIA should highlight any areas of risk and maximise the benefits of proposals in terms of Equalities. It therefore helps to ensure that the Council has considered everyone who might be affected by the proposal.

It also helps the Council to meet its legal responsibilities under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, the Welsh Language (Wales) Measure 2011 and supports the wider aims of the Well-being of Future Generations (Wales) Act 2015. There is also a requirement under Human Rights legislation for Local Authorities to consider Human Rights in developing proposals.

Specifically, Section 147 of the Equality Act 2010 is the provision that requires decision-makers to have 'due regard' to the equality implications of their decisions and Welsh Language Standards 88-97 require specific consideration of Welsh speakers under the Welsh Language Standards (No.1) Regulations 2015.

The Older People's Commissioner for Wales has also published 'Good Practice Guidance for Equality and Human Rights Impact Assessments and Scrutinising Changes to Community Services in Wales' to ensure that Local Authorities, and other service providers, carry out thorough and robust impact assessments and scrutiny when changes to community services are proposed, and that every consideration is given to mitigate the impact on older people and propose alternative approaches to service delivery.

The Council's work across Equalities, Welsh Language and Human Rights is covered in more detail through the **Equalities and Welsh Language Objectives and Action Plan 2016-2020**.

This approach strengthens work to promote Equalities by helping to identify and address any potential discriminatory effects before introducing something new or changing working practices, and reduces the risk of potential legal challenges.

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the **Equalities and Welsh Language Portal** and the Council's Equalities and Welsh Language team can offer support as the EIA is being developed. Please note that the team does not write EIAs on behalf of service areas, the support offered is in the form of advice, suggestions and in effect, quality control.

Contact equalities@caerphilly.gov.uk for assistance.

PURPOSE OF THE PROPOSAL

1 What is the proposal intended to achieve?

The Gwent Homelessness Strategy is a requirement of the Housing (Wales) Act 2014. This is a new strategy and has been developed on a regional basis unlike any previously published homeless plan. The strategy is underpinned by an extensive review of services, stakeholders and providers and this research has directed the development of regional and local actions for the forthcoming 4 years. The strategy, review and action plan will be publically available documents, available in English and Welsh, on paper and on line.

Councils in Gwent have a statutory duty to give housing advice to all its residents and duties to provide temporary accommodation as required to homeless families, pregnant women, certain young people and vulnerable single people. The Gwent Homeless teams also have a duty to cooperate with the responsible authorities: the police, probation and prisons to help to house high risk offenders and under the duties to prevent crime and disorder.

The four priorities of the strategy are to

- Help improve access to suitable and affordable housing
- Offer fast and effective advice and support, working with partners to help vulnerable people
- Minimise homelessness and prevent it through early intervention
- Ensure fair, equal and person-centred homeless services

2 Who are the service users affected by the proposal?

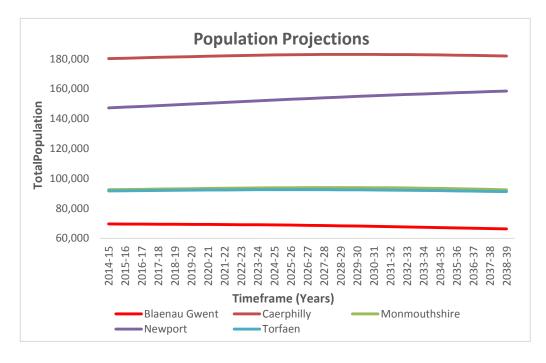
Homelessness or the threat of such a crisis can happen to any household at any time, regardless of socioeconomic status, household make-up or age. We know the profile of service users through the data that each organisation collects (WHO12). There is a range of publically available information which shows us who our services users might be in the future. The extensive consultation exercise undertaken to develop the strategy also provides us with good information so that we can design and develop services and actions appropriate to meet the identified need.

Table 1 displays the number of persons per square kilometre, showing that Monmouthshire is by far the most rural area in Gwent.

Number of people per square	Mid-	Mid-	Mid-	Mid-	Mid-	Mid-
kilometre	year	year	year	year	year	year
	2011	2012	2013	2014	2015	2016
Blaenau Gwent	642.1	642.2	641.9	640.8	639.6	640.4
Caerphilly	644.5	645.4	646.2	648.7	649.5	650.6
Monmouthshire	107.8	107.9	108.5	108.7	108.9	109.3
Newport	765.2	766.9	769.2	770.7	775.6	782.8
Torfaen	725.5	726.9	727.2	728.8	730.6	732.3
Wales	98.3	98.5	98.5	98.6	98.4	98

Table 1: National Statistics Local Authority Population Projections for Wales 2014

Population growth estimates in Graph 1 show that proportionally, the greatest population growth is projected to be in Newport over the next twenty years, with Caerphilly showing a small projected increase. Conversely, the population of Blaenau Gwent may decrease, whilst Torfaen and Monmouthshire reduce only slightly. It is fair to assume that Newport is likely to see more of a corresponding increase in the general demand for public services, compared to the other Gwent local authorities because of this.



Graph1: National Statistics Local Authority Population Projections for Wales 2014. *Assumptions about births, deaths, and migration are have also been incorporated into the figures by the Welsh Government

In Table 2 below, we see the range and levels of diversity across the region as a whole, broken down to the individual local authority level.

Percentages of the Population: Aged 16-24" 10.8 10.4 9.2 11.1 10.6 11.6 11.6 Aged 25-44" 24.6 25.1 19.9 25.9 23.9 23.8 Aged 65 plus" 19.8 18.8 24.1 17.4 20.1 20.1 20.2 20.3 22.5 20.2 20.2 20.4 20.1 20.4 20.1 20.4 20.1 20.4 20.1 20.1 20.2 20.1 20.2 20.1 20.2 20.2 20.1 20.2 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.1 20.2 20.2 20.1 20.2 20.2 20.2 20.2 20.3 20.2 20.2 20.3 20.2 20.1 20.2 20.2 20.3 2	Table 2							
Aged 16-24" 10.8 10.4 9.2 11.1 10.6 11.6		Blaenau	Caerphilly	Monmouthshire	Newport	Torfaen	Wales	
Aged 25-44" 24.6 25.1 19.9 25.9 23.9 23.8								
Aged 65 plus* 19.8 18.8 24.1 17.4 20.1 20.4	•	10.8		9.2		10.6	11.6	
Vorking age adults that are disabled** 25.4 26 21.4 23.7 23.3 22.5 Male* 49.3 49.0 49.4 49.1 48.7 49.3 Female* 50.7 51.0 50.6 50.9 51.3 50.7 Identifying as other gender *** There is a widely acknowledged gap in statistical data on gender identity in the UK, which it is anticipated the 2021 Census will address. Census will address. From Non-white Background**** 98 98 98.6 92 97.5 95.3 Gypsy and Irish 0.1 0.02 0.01 0.06 0.2 0.1 Traveller**** Asylum 0 0 0 18.32 0 -								
hat are disabled** 25.4 26 21.4 23.7 23.3 22.5 Male*	0 1	19.8	18.8	24.1	17.4	20.1	20.4	
Female	Working age adults that are disabled**	25.4	26	21.4	23.7	23.3	22.5	
Identifying as other gender ***	Male*	49.3	49.0	49.4	49.1	48.7	49.3	
Gender Gender Gender Gensus Gender Gensus G	Female*	50.7	51.0	50.6	50.9	51.3	50.7	
Gender Gender Gender Gensus Gender Gensus G		There is	a widely a	cknowledged g	ap in stati	stical dat	a on	
Census will address From Non-white Background**** 2	gender ***							
From Non-white Background***** Park Program P		_	•		то от тито гр			
From White 98 98 98.6 92 97.5 95.3					8	2.5	4.7	
Gypsy and Irish Traveller*****	From White	98	98		92		95.3	
Asylum	Gypsy and Irish							
Seekers**********************************	Traveller****	0.1	0.02	0.01	0.00	0.2	0.1	
Refugees******	Seekers*****	0	0	0	18.32	0	-	
Heterosexual***********	Refugees*****	1.7	3.7	4.0	2.5	3.0	-	
Identifying as Gay or Bisexual************************************	Household Language******	0.7	0.5	0.6	2.9	0.5	1.7	
or Bisexual************************************		-	96.4	98.7	95.4	97.7	95	
Adult with Child(ren)************************************	Identifying as Gay or Bisexual*******	-	1	0.7	1.9	1	1.5	
Adult with Child(ren)************************************	1 Person House- hold********	33	28	28	32	30	32	
Child(ren)******** 19.8 22.3 21.3 22.2 22.1 20.3 2 Plus Adults no Children********* 39.8 41.9 45.8 37.8 41.0 41.3 No Religion*********** 41.1 40.9 28.5 29.7 35.8 32.1 Christian********** 49.9 50.7 62.5 56.9 55.4 57.6 Buddhist********** 0.2 0.2 0.3 0.2 0.2 0.3 Hindu*********** 0.1 0.1 0.2 0.5 0.3 0.3 Jewish********** 0.01 0.04 0.1 0.1 0.02 0.1 Muslim********** 0.3 0.2 0.3 4.7 0.3 1.5 Sikh********** 0.1 0.1 0.1 0.1 0.1 0.1 0.1 Other Religion********** 0.4 0.4 0.4 0.3 0.3 0.4 Pregnant (aged 19 and under) ************************************	1 Adult with Child(ren)*******	7.8	8.0	4.6	8.1	7.1	6.8	
Children******** 39.8 41.9 45.8 37.8 41.0 41.3 No Religion********** 41.1 40.9 28.5 29.7 35.8 32.1 Christian********* 49.9 50.7 62.5 56.9 55.4 57.6 Buddhist********* 0.2 0.2 0.3 0.2 0.2 0.3 Hindu********* 0.1 0.1 0.2 0.5 0.3 0.3 Jewish********* 0.01 0.04 0.1 0.1 0.02 0.1 Muslim********* 0.3 0.2 0.3 4.7 0.3 1.5 Sikh********** 0.1 0.1 0.1 0.1 0.1 0.1 Other Religion********* 0.4 0.4 0.4 0.3 0.3 0.4 Pregnant (aged 19 and after by local authority (aged 0- 11.8 11.7 7.9 9.6 11.7 11.9	Child(ren)*******	19.8	22.3	21.3	22.2	22.1	20.3	
Religion********* 41.1 40.9 28.5 29.7 35.8 32.1 Christian********* 49.9 50.7 62.5 56.9 55.4 57.6 Buddhist********* 0.2 0.2 0.3 0.2 0.2 0.3 Hindu********** 0.1 0.1 0.2 0.5 0.3 0.3 Jewish********* 0.01 0.04 0.1 0.1 0.02 0.1 Muslim********* 0.3 0.2 0.3 4.7 0.3 1.5 Sikh********** 0.1 0.1 0.1 0.1 0.1 0.1 Other Religion********* 0.4 0.4 0.4 0.3 0.3 0.4 Pregnant (aged 19 and under) ************************************	Children*******	39.8	41.9	45.8	37.8	41.0	41.3	
Buddhist********* 0.2 0.2 0.3 0.2 0.2 0.3 Hindu********* 0.1 0.1 0.2 0.5 0.3 0.3 Jewish********* 0.01 0.04 0.1 0.1 0.02 0.1 Muslim********* 0.3 0.2 0.3 4.7 0.3 1.5 Sikh********** 0.1 0.1 0.1 0.1 0.1 0.1 Other Religion******** 0.4 0.4 0.4 0.3 0.3 0.4 Pregnant (aged 19 and under) ****************** 11.8 11.7 7.9 9.6 11.7 11.9 Children looked after by local authority (aged 0- 0.4	Religion*******	41.1	40.9	28.5	29.7	35.8	32.1	
Hindu************************************	Christian*******	49.9	50.7	62.5	56.9	55.4	57.6	
Hindu********* 0.1 0.1 0.2 0.5 0.3 0.3 Jewish********* 0.01 0.04 0.1 0.1 0.02 0.1 Muslim********* 0.3 0.2 0.3 4.7 0.3 1.5 Sikh********* 0.1 0.1 0.1 0.1 0.1 0.1 Other Religion******** 0.4 0.4 0.4 0.3 0.3 0.4 Pregnant (aged 19 and under) ************** 11.8 11.7 7.9 9.6 11.7 11.9 Children looked after by local authority (aged 0- 0.4	Buddhist*******	0.2	0.2	0.3	0.2	0.2	0.3	
Jewish********* 0.01 0.04 0.1 0.02 0.1 Muslim********* 0.3 0.2 0.3 4.7 0.3 1.5 Sikh********* 0.1 0.1 0.1 0.1 0.1 0.1 Other Religion******** 0.4 0.4 0.4 0.3 0.3 0.4 Pregnant (aged 19 and under) ************ 11.8 11.7 7.9 9.6 11.7 11.9 Children looked after by local authority (aged 0- 0.4 <td< td=""><td>Hindu******</td><td></td><td></td><td></td><td></td><td></td><td></td></td<>	Hindu******							
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and under) *********** 11.8		U. T	0.7	0.7	0.0	0.0	0.7	
Children looked after by local authority (aged 0-	and under)	11.8	11.7	7.9	9.6	11.7	11.9	
authority (aged 0-					-			
	authority (aged 0-	17.3	18.9	16.5	20.2	18.4	17.9	

Table 3 displays the number of households presenting to local authority homeless services throughout three financial years, compared to the duties owed:

Household	Blae	nau G	vent	С	aerphi	lly	Mon	mouth	shire	l	Newpor	t		Torfae	n
Numbers Not Percentages	2015-16	2016-17	2017-18	2015-16	2016-17	2017-18	2015-16	2016-17	2017-18	2015-16	2016-17	2017-18	2015-16	2016-17	2017-18
Total Household Numbers (Total Outcomes Only)	552	651	668	672	1581	1972	591	744	584	2154	2532	2142	780	1053	1116
Ineligible Homeless Assessment Applications	-	3	-	-	36	18	-	60	31	39	33	26	-	72	80
Eligible but not Homeless or Threatened with Homelessness	129	108	48	21	249	816	195	240	7	858	339	107	186	150	23
Eligible and Prevention Assistance Provided (section 66)	267	303	289	249	609	571	249	183	255	393	537	461	333	432	427
Eligible and Duty to help to Secure (section 73)	132	198	263	288	525	410	96	216	228	537	1107	968	147	315	395
Eligible, Homeless but not in Priority Need	9	18	32	45	54	19	6	9	19	114	321	294	24	6	129
Eligible, Homeless and in Priority Need, but Intentionally so	-	-	-	18	24	4	9	-	12	15	15	8	21	12	23
Eligible, Unintentionally Homeless and in Priority Need (section 75)	12	21	36	54	81	134	39	36	32	204	180	278	69	66	39
Total Section 66, 73 and 75 Duties	411	522	588	591	1215	1115	384	435	515	1134	1824	1707	549	813	861

Table 3 WHO12 Data Collected by Local Authorities. Numbers of presenting homeless cases and type of assistance given. Hyphen means zero figure was submitted to Welsh Government

IMPACT ON THE PUBLIC AND STAFF

Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals?

A wide ranging consultation exercise took place to ensure we consulted as broadly as possible:

- A desktop review of key literature, statistical data and samples of homelessness cases from each of the five councils.
- Focus groups and group discussions with key staff in the five councils (from departments relevant to the preparation and implementation of homelessness planning). Strengths, weaknesses, opportunities and threats (SWOT) and political, economic, social, technology and legislation (PESTL) analyses and semi-structured interviews were used.
- Focus groups with Supporting People providers using SWOT and PESTL analyses and themed group discussions.
- A regional event to collect feedback from service providers, partners and other stakeholders (over 400 individuals from representative organisations across Gwent were invited and 140 people attended the event. Representatives covering 25 themes
- The themes we explored included gender, LGBT, domestic violence, gypsy and traveller communities, older people, young people and care leavers, mental health, drug and alcohol use, armed forces, offenders, disability, cultural diversity, ethnicity, refugee and asylum seekers, health and social care service users.
- Surveys with people who have experienced homelessness and related services first hand across Gwent – factoring in equality and diversity, vulnerabilities and varying support needs (there were 165 respondents).
- Direct engagement with different service user groups.

Homelessness services are provided by both statutory and voluntary agencies and must be built around the needs and preferences of service users, as much as reasonably possible. Consultation and partnership working has therefore been central to the development of the homelessness review and strategy. This will continue to be a very important element, as homelessness action plans develop in each of the five local authorities over the coming years.

The data collected from service users has been anonymised. Statutory and voluntary agencies that helped to carry out the surveys were all provided with a brief to help make sure service users' consent was fully informed and everyone participated consensually.

All the information collected has been analysed with fundamental elements being drawn out, to structure the reviews (and strategic action plans) and address the points outlined in the introduction. This work has then been condensed into the themes embraced within the homelessness strategy, in the form of a vision, mission,

values and strategic objectives, with greater specific detail in the action plans.

Actions required:

- Check the equalities monitoring data returns; make sure we consult with Tai Pawb.
- Take advantage of the Street Homeless Information Network to gain detailed insight into the support needs and homeless interventions required for this hard to consult group.
- We need to improve our engagement with hard to reach homeless from home individuals and others such as sofa surfers.
- Rolling service user surveys?

4 What are the consequences of the above for specific groups?

The benefits of cross boundary working across the region will provide us with the opportunities to provide wider ranging and more inclusive services: Savings may be achieved by jointly commissioning services (e.g. a cross boundary rough sleeper hostel, a cross boundary gypsy and traveller support service) however; working as individual authorities, the cost: benefit of providing a new service would be difficult to demonstrate. The regional strategy approach provides a much needed partnership funding opportunity to provide services we can ill afford as individual local authorities.

Equality and fair access to services are essential components of the new homelessness strategy. All of the Gwent local authorities have statutory duties contained in the Equality Act 2010 and each of the Gwent local authorities Strategic Equality and Diversity Plans/Policies for further information have been referenced in the strategy. There are a number of policy documents around equality, diversity and fairer access to services that have strategic links with homelessness. Examples include: The completion of a Gypsy and Traveller Accommodation Assessment, to identify housing needs amongst the Gypsy and Traveller community; older people strategies and plans; SP strategies and plans; younger people's strategies and plans, housing adaptation and disabled facility grant policies and procedures and also plans connected to refugee and asylum seekers.

We are aware that individually, authorities within the region have variations in terms of diversity: Newport for example, being a city authority, demonstrates a wider range of ethnicity, refugee/asylum seekers and religious variation amongst its homeless presentations. In Blaenau Gwent there are a higher proportion of single homeless presentations compared to the rest of the region and given that it is the smallest of the council areas within the region, this represents a difficulty in terms of assisting single homeless people.

Through adopting a regional consultation approach and comparison of historical and more recent data, the regional homeless strategy approach provides us with a wider range of opportunities to address imbalances of service across the region for homeless people who are not currently in receipt of the most appropriate services.

Actions required:

• Maintain equalities data monitoring and analysis throughout the period of the

- strategy.
- Annually review the strategy action plan where changes in equalities monitoring data have been identified.
- Ensure the strategy action plan continues to be relevant and positive for all service users.
- In line with the requirements of the Welsh Language Standards. (No.1)
 Regulations 2015, please note below what effects, if any (whether positive or adverse), the proposal would have on opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language.

All documentation associated with the development and preparation of the regional strategy has been undertaken in accordance with Welsh Language Standards 88 to 93. All published documentation will be available in English and Welsh, on paper and online.

All services available in English will also be available in Welsh, whether spoken or written. This will apply to all services such as the provision of advice and assistance, the provision of legal documentation such as personal housing plans and, correspondence confirming the duties under the Housing (Wales) Act 2014.

Actions required:

- Collect, monitor and review the demographic spread of Welsh language speakers amongst service users
- If possible, utilise the 2021 census data on Welsh language and demographic spread across the region
- Conduct an annual Welsh skills audit of housing advice staff and available referral services
- Continue to promote and encourage Welsh language learning opportunities within homeless and associated services for homeless service users
- Promote services in Welsh alongside all existing and planned homeless service user communications

INFORMATION COLLECTION

6 Is full information and analysis of users of the service available?

We are satisfied that all the available information from service users, stakeholders, officers and staff has been taken into account in the preparation of the 4 year strategy. We are also aware that data capture limitations do exist, such as that for rough sleepers. A new and interactive information collection exercise is planned for the whole of Wales in 2019 known as SHIN (the Street Homeless Information Network). This project will provide detailed information on this service user group, to assess need and improve service planning mechanisms for rough sleepers. This will assist us with the Gwent regional approach to assisting rough sleepers throughout the term of the strategy

There will always be under reporting of some forms of homelessness by certain service users and these are issues largely outside of the remit of the strategy. However, where wider information and data collections from other partner agencies permits data sharing, we will work as closely as possible to be as inclusive as possible with service provision. Examples of potential under-reporting are hate crime incidents and domestic violence, where the barriers to reporting and seeking homelessness service assistance lies with the service user not the service.

Actions required:

 Ensure that all our homeless service partnership work includes confidential routes and pathways for diverse groups.

CONSULTATION

7 What consultation has taken place?

Guidance and advice in the preparation and undertaking of this assessment has been sought from:

Anwen Cullinane

Senior Policy Officer (Equalities and Welsh Language)
Public Protection, Penallta House, Ystrad Mynach, CF82 7PG

Tel: 01443 864404 Email: equalities@caerffili.gov.uk

Vicki Doyle

Policy Officer: provision of advice on census data capture and planned changes for 2021

Corporate Policy Unit, Penallta House, Tredomen, Ystrad Mynach, CF82 7PG

Tel: 01443 866391

Email: doylevm@caerphilly.gov.uk

Lisa Rawlings

Regional Armed Forces Covenant Liaison Officer: additional survey data provision

Tel: 01443 864447

Email: rawlil@caerphilly.gov.uk

Actions required:

MONITORING AND REVIEW

8 How will the proposal be monitored?

All service user data collection systems are set up to record and monitor equalities data. The assessment of the homeless duties local authorities are required to make go a stage further: the homeless assessment has to take into consideration an applicant's particular circumstances. Examples of this will be whether an applicant is fleeing domestic violence, is experiencing hate crime, has vulnerability or other special reason determining them as vulnerable for that reason. This type of detail is recorded within the statutory homeless returns required by Welsh Government.

Actions required:

• Monitor the statutory WHO12 data sets specifically tables 3 and 4a to 4d

9 How will the monitoring be evaluated?

We will use the collected equalities monitoring data to examine the efficacy of the strategy action plan to ensure that it remains representative of the various and diverse groups we have identified across the region. How and when will you do this?

Actions required:

 Include the requirement to monitor and evaluate the effectiveness of equalities monitoring in the homeless strategy action plan annual review.

10 Have any support / guidance / training requirements been identified?

As expressed in the WG's 10 year Homelessness Plan 2009-19 it remains important to maximise opportunities for training and employment for vulnerable people, as "engagement with training and employment creates the foundation for stable tenancies". The WG's New Employability Plan launched March 2018 provides four updated actions for improving employability in Wales. Understandably the WG's Rough Sleeping Action Plan 2018 and National Principles for Housing First 2018 make strong strategic links with employment, education and training and these themes are all connected with the new homelessness strategy.

Staff training and the need for continual professional development (CPD) is connected to significant amount of the consultation feedback. For example, customer service skills, managing expectations, managing confrontation, working with private landlords, legal knowledge, proficiency tests, psychologically informed practice, ensuring refresher training and good training for new staff and apprenticeship schemes were all mentioned during the Welsh Homeless Network meeting on 16.01.18.

In the Wales Audit Office report How Local Government manages demand –

Homelessness 2018, recommendation 1 supports staff being "sufficiently skilled to deal with the new demands of mediating, problem solving, negotiating and influencing". Training was brought up a number of times during consultation (e.g. Welsh Homeless Network meeting 16.01.18 and Caerphilly Council Staff Focus Group meeting 24.01.18). However, it remains a concern that training could become increasingly limited due to council capacity/cost (e.g. Monmouthshire County Council Local Authority Staff Focus Group 13.02.18). Further, there are concerns that homeless legislation is being interpreted differently (e.g. Stakeholder Engagement Event on 28.02.18) and this could impact on the accuracy of the data capture for certain client groups.

Prison leavers and those leaving institutions or care are consistently at risk of homelessness and should be focused upon, with prison leavers particularly at risk of rough sleeping. Exploring specialist recovery and rehabilitation programmes, community payback unpaid work, education, training and employment, mentoring and working with families of offenders etc. can be an effective approach to take. I think this paragraph is in the wrong section.

Actions required:

There are certain areas we have identified that are not overly resource intensive:

- Work with Rent Smart Wales to promote and improve awareness of equality and diversity in the private rented sector (the highest growth area of housing supply in Wales). standards/educate landlords in the sector e.g. offer free training and support for landlords
- Lack of training among statutory and 3rd sectors on modern day slavery and risks of exploitation to vulnerable, including those homeless, with mental health and substance misuse issues: work with Supporting People to promote training opportunities
- Gypsy and Traveller cultural awareness training is required by all agencies: arrange a regional training and awareness raising event
- The provision of council staff training could be opened up to agency staff to ensure consistency of and maximise resources.
- Participate in the Integrated Offender Management group which has been established to take an holistic approach to the wellbeing of offenders, their families and reduce the re-offending rate.

Where you have identified mitigating factors in previous answers that lessen the impact on any particular group in the community, or have identified any elsewhere, please summarise them here.

Consultation with hard to reach groups such as street homeless rough sleepers has the potential to radically improve through the SHIN project. This project will be hosted by the Wallich and will manage the collection of rough sleeper information across Wales. The benefit of this data collection is that it will link in with the Supporting People outcomes data. Supporting People and Homelessness services are intrinsically linked partners.

All of the homeless teams in the region operate the Abritas housing management system, which will enable consistency and accuracy of our equalities data collection.

A Gwent wide Armed Forces Covenant Liaison Officer is in post to ensure forces leavers are not disadvantaged because of the time spent away from the region on military service. The post holder has successfully achieved changes in housing policy in two of the local authorities in Gwent: this is a significant achievement and addresses a major area of housing disadvantage.

12 What wider use will you make of this Equality Impact Assessment?

The practice of undertaking an EIA on a regional basis has provided us with the assurance that the five authorities have considered the equalities agenda in a consistent manner. The overarching themes identified in the consultation process have been developed into actions that are underpinned by themes and wider strategic actions to encompass equal access to all. Where the strategic action plan contains local actions, the relevant local authority will incorporate the local standards of their equality and diversity policies.

The EIA will be used when we need to respond to emerging trends and changes in regional and area specific population demographic over the term of the strategy action plan. This EIA will also be used to support regional and local proposals for new schemes and support commissioning with partner agencies.

Actions required:

- Include EIA within the Regional Homeless Strategy document set for publication
- EIA, when completed, to be returned to equalities@caerphilly.gov.uk for publishing on the Council's website.

Completed by:	Suzanne Cousins
Date:	18 th October 2018
Position:	Housing Solutions Manager
Name of Head of Service:	Shaun Couzens