Housing Support Grant Guidance

Practice Guidance for Local Authorities from April 2020

Updated March 2021

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

Ariennir gan **Lywodraeth Cymru**
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Chapter 1: About the Housing Support Grant

1.1 Background

1.1.1 The Housing Support Grant (HSG) is an amalgamation of three existing grants; Supporting People Programme, Homelessness Prevention Grant[1] and Rent Smart Wales Enforcement.

1.1.2 It came into being in April 2019 following the Welsh Government funding flexibilities pathfinder project. A Ministerial decision was made in October 2018 to form two grants from the Early Intervention, Prevention and Support grant (EIPS) work, separating the housing-related grants from non-housing elements for all local authorities. Consequently, from April 2019, the Welsh Government established a Children and Communities Grant (CCG) (encompassing Flying Start, Families First, the Legacy Fund, Promoting Positive Engagement for Young People, St David's Day Fund, Communities for Work Plus and Childcare and Play), and a single Housing Support Grant (HSG) (encompassing Supporting People, Homelessness Prevention and Rent Smart Wales Enforcement).

1.1.3 Welsh Government has set clear expectations that the CCG and the HSG should work in a seamless fashion, providing integrated services where appropriate. We have attempted throughout this guidance document to set out clearly where the links with the CCG can and should be made.

1.2 About the HSG

1.2.1 The HSG is an early intervention grant programme to support activity, which prevents people from becoming homeless, stabilises their housing situation, or helps potentially homeless people to find and keep accommodation. The HSG does not fund the statutory duty on local authorities to prevent homelessness, instead HSG funded services augment, complement and support the statutory service to ensure that the overall offer authorities provide helps people into the right homes with the right support to succeed. It supports vulnerable people to address the, sometimes multiple, problems they face, such as debt, employment, tenancy management, substance misuse, violence against women, domestic abuse and sexual violence, and mental health issues. Support is person centred, aimed at supporting people to secure and maintain sustainable housing by addressing the mental health and substance misuse or other problems they face, helping to improve their health and well-being and/or helping them progress into, or nearer to, a job or training opportunity based on their specific circumstances.

1.2.2 The grant programme makes a significant contribution to the implementation of Part 2 of the Housing (Wales) Act 2014, which is focused on homelessness prevention. It also reduces or prevents the need for, often more costly interventions, by other public services including the NHS and/or social care for individuals and families and, in some cases, people who fall into the criminal justice system.

[1] Not all funding from the Homelessness Prevention Grant has been transferred to the Housing Support Grant. The Homelessness Prevention Grant will continue to operate as a separate grant mechanism to support the delivery of national projects and initiatives.

1.2.3 The HSG is a grant mechanism which funds part of an overall 'Housing Support Programme' that encompasses both the statutory homelessness duty funded through the revenue settlement and the non-statutory[2] housing support preventative services funded through the HSG. Viewing both as a whole allows us to take a systematic approach to reducing homelessness and the impact of homelessness and unstable housing; directing resources and activity to those areas which will have the greatest impact, in turn reducing demand on public services and improving health and well-being outcomes.

1.2.4 The Housing Support Programme will be articulated in a single strategic statement to be developed by local authorities as set out in chapter four.

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1.2.5 The grant is distributed to local authorities to deliver, administer and to commission services to meet the vision and core purpose of the grant as set out in chapter two. This guidance document sets out the governance framework in which local authorities should operate and administer the grant. Compliance with the guidance is therefore an expectation established by the grant terms and conditions. The Welsh Government will monitor local authority compliance with this guidance document via grant terms and conditions and through reporting requirements set out at chapter eight. This guidance has been operative since the 1st April 2020.

[2] Non statutory in this context should be understood to be outside the specific homelessness statutory duties on local authorities under the Housing (Wales) Act 2014

Chapter 2: Core purpose and eligibility of the Housing Support Grant

2.1 Introduction

2.1.1 It is essential that the Housing Support Grant (HSG) has a clear and shared vision, is underpinned by strong values and its strategic objectives include how it works with and complements other Welsh Government programmes. This chapter sets out the vision, values, core purpose and eligibility of the grant against which local authorities should be delivering.

2.2 Vision

2.2.1 Housing is a key priority area in the Welsh Government's Prosperity for All National Strategy, which sets out the vision that "We want everyone to live in a home that meets their needs and supports a healthy, successful and prosperous life".

2.2.2 The HSG supports the aim of working together to prevent homelessness and where it cannot be prevented ensuring it is rare, brief and un-repeated. To do this we need to tackle the root cause of homelessness and work to enable people to stay in their own homes longer. Therefore the HSG seeks to secure "*A Wales where nobody is homeless and everyone has a safe home where they can flourish and live a fulfilled, active and independent life".*

2.2.3 In support of ensuring any homelessness that cannot be prevented is brief and unrepeated, the Welsh Government has undertaken to move to a rapid re-housing approach. Strategic planning for the HSG must therefore take account of how it will support delivery of the transformation shift required to move to such an approach. Additional guidance specifically in respect of rapid re-housing will be provided to local authorities and should also be used to inform the development of Housing Support Programme Strategies.

2.3 Grant purpose

2.3.1 The purpose of the HSG is to prevent homelessness and support people to have the capability, independence, skills and confidence to access and/or maintain a stable and suitable home. This should be achieved through:

- Services that build the capacity and ability of individuals or households to maintain a home.
- Services that prevent homelessness or the need for an individual to live in an inappropriate institutional setting.
- Providing or enabling access to suitable housing for individuals or households.
- Services that mitigate the impact of homelessness on individuals or households.
- Brokering access to other services for people in housing need.
- Raising awareness and understanding with other professionals and with the wider public, including in schools and colleges.
- Action to enforce legislation intended to secure and maintain access to good quality homes, which was previously funded through the Rent Smart Wales (RSW) grant. For example, legislation that places duties on landlords to be registered and regarding the management of tenancies.

2.4 Values

2.4.1 The values underpinning the HSG and the principles we expect to underpin strategic planning for the prevention and relief of homelessness across public services are set out below. These and the principles of the Well-being of Future Generations (Wales) Act 2015 should shape the overall approach used across the whole of the housing support sector:

- The earliest preventions are most effective and most cost effective and should always be the interventions of first choice.
- Tackling and preventing homelessness is a whole public services matter – rather than simply a 'housing matter'.
- All services should place the individual at the centre, working to their strengths and supporting them to achieve their aspirations.
- Services should be commissioned and delivered in a psychologically informed way, taking into account the impact of trauma on people who require support, in order to achieve a sustainable impact. This includes the five components of psychologically informed approaches: the psychological framework; relationships; staff support and training; evidence generating practice; and physical environment (see 2.9).
- Policy, service delivery and practice should be informed and shaped in a co-productive manner with service providers and those with lived experience.
- Services should be developed using the best available evidence.
- The duties in Part 2 of the Housing (Wales) Act 2014 should be the last line of defence – not the first - and all services should work to the spirit not simply the letter of the law.
- We expect all services to treat people with respect and as experts in their own lives, to work with empathy, listening and building trusting relationships and to be accountable to service users, the public and service commissioners.
- Housing support must be delivered in a way which enables the effective delivery of complementary public services by ensuring their impact is not undermined by unstable housing circumstances. For example, the impact of mental health services can be undermined by a chaotic lifestyle - stabilising an individual's housing circumstance can improve the impact of that clinical response. HSG will achieve this by adopting collaborative approaches to working with other functions and agencies.

2.5 Eligibility

Who is eligible

2.5.1 Any person in need of support to prevent them becoming at risk of homelessness, to address homelessness or achieve a more stable housing circumstance is eligible to receive housing support, as long as they are eligible to receive help under the Housing (Wales) Act 2014 and the Allocation of Housing and Homelessness (Eligibility) (Wales) Regulations 2014, regardless of their tenure or lack of tenure.

Age

2.5.2 People eligible for services must be 16 or over.

2.5.3 Pre-tenancy work with individuals under 16 is allowed where the purpose is to build the individual's capacity to take on a tenancy or right to occupy a home after their 16th birthday. Note that where the need is for family support, the purpose of which is

to allow the individual under 16 to remain within the family home, CCG funding is available and should be utilised to cover these costs.

Immigration Status

2.5.4 People who are not eligible to receive help under the Housing (Wales) Act 2014 and the Allocation of Housing and Homelessness (Eligibility) (Wales) Regulations 2014, due to their immigration status, are not eligible to receive HSG funding.

No local connection criteria

2.5.5 For the purpose of the HSG local connection criteria DO NOT apply. This does not affect local connection criteria as they apply to statutory homelessness duties or allocations policies.

2.5.6 This does not create a responsibility to fund HSG provision outside the local authority boundary. For HSG, it is the expectation that the local authority meets the need at the point where it is presented and that local connection is not considered in relation to HSG funding.

Tenure

2.5.7 People exhibiting a need for HSG funded support may be resident in, or receive a referral to a property within the private rented or owner occupied sector. Wherever possible, services should be tenure neutral to ensure access to services is not determined by the housing circumstances of the household. Commissioners should ensure that they monitor tenure to ensure provision is balanced.

2.6 What the grant can fund

2.6.1 At the core of the grant is the prevention of homelessness. There is substantial flexibility in the use of the HSG funding, provided it helps enable people to access or sustain accommodation. The following is not meant to be an exhaustive list of what the grant can fund but provides a general guide around which decisions can be made by local authorities. Provision of support services should be based on identified or assessed needs; this assessment must be flexible and person centred. Any activities funded must be able to demonstrate that they accord with the purpose of the grant as stated above in 2.3.

- Services to enable access to housing for individuals or households, including help with accessing a tenancy and negotiating appropriate tenancy terms.
- Services to help vulnerable people develop or maintain the skills and confidence necessary to live as independently as possible in a safe and suitable home.
- Services to sustain a tenancy, such as mediation with landlords, preparation for managing a tenancy, housing-related support provided via group work or individually, and small sums for innovation where they are used with the person to enhance their ability to live more independently.
- Services which seek to intervene early (prior to the statutory homelessness stage) to support households to sustain their tenancy or other right to occupy their home.
- Services that improve the sustainability of the housing of an individual by tackling their social isolation and helping them play a full part in their community.

- Initiatives which seek to ensure homelessness is brief and un-repeated, such as rapid re-housing and support approaches like Housing First.
- Services that have good links with, and refer or signpost people to, services which provide opportunities for education, training, volunteering, and employment.
- Action to enforce housing legislation, where the legislation supports access to safe and secure housing for people in need of support, including enforcement of RSW registration obligations on landlords. However, this should be limited to spend previously received under RSW grant funding. In addition, the HSG should not be used to fund the provision of enforcement activity or staff within enforcement teams – this should be funded from other sources.

The grant can also be used to fund:

- Translation, interpretation or BSL services where support services work with BAME Groups, refugees and people with sight/hearing impairments.
- Providing provisions (food/toiletries) in temporary accommodation settings/hostels to help people get settled. The ongoing provision of food or other household supplies is not allowable under the grant.
- Training or therapeutic support of staff funded by the HSG, to enable them to effectively deliver their role.
- Gateway services, together with associated IT licence costs, which facilitate access for service users to appropriate service responses. This excludes the delivery of statutory duties under homelessness and social care legislation.
- Services to individuals who the LA has concluded that no statutory homeless duty is owed.
- Discretionary Payments to facilitate the purpose of the grant i.e. a one off non re-occurring expense designed to make it easier for an individual to live in their own home.
- Emotional support which promotes resilience and well-being for service users in receipt of a housing related support service.
- Mediation services in order to prevent homelessness or help to protect the individual's occupation of their own home.
- Activities which build a person's understanding of their housing rights, including welfare rights.
- Any research and evaluation which supports the continuous improvement of grant delivery. (Except where there are specific exclusions specified at 2.7.1)
- The provision of alarms and monitoring services where the provision improves the ability of the recipient to maintain their ability to remain in their home (see Annex F)
- Relevant costs associated with the provision of effective support, such as childcare or travel expenses, to enable service users to attend courses or other similar activity to address their support needs.

2.7 What the grant should not fund

2.7.1 The Grant should not fund:

- Capital expenditure – this is a revenue grant.
- Any of the core services required under any statutory duty held by a public body, e.g. homelessness and social care legislation (such as the Social Services and Well-Being (Wales) Act 2014). This restriction applies regardless of whether that statutory duty is, in practise, being discharged. That is, HSG cannot be used to

replace statutory provision, or the duty to make it, and the burden of that statutory duty must fall to relevant budgets.

- Social care services. It complements and enhances such services, but its primary aim is to enable, not care for, people using its services. This includes care registered with Care Inspectorate Wales and care provided under Section 117 of the Mental Health Act 1983, except for housing related elements. The HSG element alone should not require registration with Care Inspectorate Wales; if this is the case then it is a social care service and should not be funded by HSG.
- Accommodation costs - including the purchasing cost or leasing costs of a building.
- Domestic assistance services e.g. activities such as shopping, cleaning, gardening and cooking. However, supporting an individual to develop their own skills in this area, rather than undertaking it for them, is in line with the purpose of the grant. There is the exception that a support worker can do shopping on behalf of/deliver shopping to an individual receiving support where it is a public health matter (e.g. where the individual has to self-isolate or is in quarantine).
- Local authority commissioning activity or grant administration, including contract specific monitoring and evaluation, and any associated IT costs.
- General housing management tasks which would normally be funded by rents or service charges. For example:

    - Setting, collecting and accounting for the rent and service charges
    - Establishing, issuing and enforcing the licence or tenancy agreement
    - Reporting and issuing repairs
    - Providing the security and door entry elements of hard wired alarm services; these should form part of the rent and service charges (see Annex F)

- Specialist independent advice services i.e. where the fundamental purpose of the service is the provision of housing advice. This does not include support services where housing advice is provided incidentally to the supportive relationship with the individual.
- Emotional support which is clinical in its nature and where a statutory body has the responsibility to provide that service. This boundary is inevitably difficult to identify, however, the fundamental test to be applied is whether the support is necessary to create the emotional well-being required to maintain a stable housing circumstance.

2.8 Length of support

2.8.1 There is no limit on the length of time support can be provided under the grant. Local authority commissioners should decide on the length of time over which support can be provided based on the needs of the service user, and should seek to support people towards independence and recovery, rather than developing dependency on services. Where the need for support is ongoing and intended to reduce the need for non-housing (‘institutional’) service responses, support would not normally be time-constrained. For example, in the case of support for frail elderly people.

2.8.2 Equally the period of support commissioned should enable a sustainable impact to be made on the needs of the user. Local authority commissioners should avoid setting time limits that are too restrictive and likely to result in people re-presenting at

services due to length of support being too short for them to develop the skills and confidence to live more independently.

2.8.3 Housing support services must be enabling and develop a person's independence i.e. 'doing with' as distinct from 'doing for'. The focus of the service should be to encourage and support the person to exercise personal choice and self-determination and accentuate their strengths, including preventing a person's level of independence from reducing.

2.8.4 Support packages must be developed and agreed with the person who is using housing support services and any risks considered. Support offered can include short term and direct interventions to prevent homelessness. Whilst there may be circumstances where the need for housing related support is ongoing, consideration should be given to the length of time a service is available, and whether some long term support is actually care or creates dependency rather than creating independence. There are circumstances where a gradual loss of capacity is inevitable, in this context housing support has the purpose of maintaining the individual's ability to exercise independent control of their housing rights.

2.8.5 Commissioners should be aware that some people may need to periodically re-engage with services to maintain their well-being and avoid homelessness. Should a crisis arise, circumstances change or wellbeing deteriorates, the ability to re-access light touch support in a prompt manner could prevent further deterioration and the need for crisis intervention.

2.8.6 Commissioners also need to ensure that HSG can continue to be used for relevant services which support people to maintain their independence and well-being, such as older people and people with learning disabilities. Ongoing HSG funded support is vital for many people to protect and retain their independence for as long as possible and avoid entering more restrictive care settings.

2.8.7 Commissioners should work with local providers and people with lived experience to understand the appropriate time limits for particular support services.

2.9 Commissioning and delivering psychologically informed services

2.9.1 The Housing Support Grant needs to have a sustainable impact on the root causes of homelessness, such as the effects of adverse childhood experiences or other forms of trauma. Services should be commissioned and delivered using a psychologically informed approach that recognises and responds appropriately to the impact of trauma. Local authority commissioners and service providers should ensure that service delivery is shaped by the five key components of psychologically informed environments:

- Psychological Framework**:** Service design, development, and evaluation should be informed by an evidence-based, trauma informed model and the organisation's culture is reflective and person centred.
- Relationships: High quality support relationships are recognised as the principal tool in effective service delivery and staff have the time to develop trusting relationships with people using services. Psychologically informed approaches are used regardless of whether details of the individual's experiences of trauma are known.

- Physical and social environment: Assessment and support environments are safe, welcoming and flexible, enabling positive, trauma-informed interaction between staff and people using services.
- Staff training and support: Staff receive training and support to increase their understanding of trauma and how this can impact on people's engagement and relationship with services. Reflective practice, continuous learning, professional supervision and therapeutic support ensure that staff feel confident to work in a psychologically informed way.
- Evidence and learning: Evidence is gathered to demonstrate the impact of psychologically informed approaches and this is used to support continuous learning and improve the effectiveness of services.

2.10 Advice and Information services

2.10.1 It is the responsibility of local authorities to assess, through the commissioning process that services are delivered with appropriate quality assurance.

2.10.2 A number of support providers who receive HSG funding provide information and advice to individuals or households on financial, budgeting, welfare and any other matters related to accessing and maintaining a home. This is eligible where the advice complements an established support relationship with the individual. As set out in 2.7.1 this is not eligible for funding where the service is purely a specialist advice service. These paragraphs set out the quality assurance requirements for services who provide advice and information in order to be able to receive HSG funding.

2.10.3 Advice providers in Wales can be quality assured under various (around twenty) independently owned Advice Quality Standards operating across the UK. These standards apply different methods, criteria, and assessment processes to appraise the quality of the information and advice services delivered by an advice provider. In order to bring more consistency around the definition and understanding of a 'quality advice service', the Welsh Government developed the Information and Quality Framework Wales (IAQF.). The IAQF Wales recognises that information and advice may take many forms. They have defined these as "Types" of Advice, and have divided them into five broad headings. See Annex D for full definitions.

- Type One – Information
- Type Two – Guidance
- Type Three – Advice
- Type Four – Advice with Casework
- Type Five – Specialist Casework

2.10.4 HSG providers who provide advice or advice with casework services (Types 3, 4 and 5) must be able to demonstrate appropriate quality assurance mechanisms are in place to ensure advice provided is accurate and delivered appropriately. Authorities can assure themselves of this either by recognising where a provider;
a) holds a recognised Quality Standard issued by an IAQF Accredited Body at the appropriate level for the service they are proposing to provide; or
b) if the provider does not hold an appropriate Quality Standard issued by an IAQF Accredited Body but does hold another Quality Standard appropriate to the type of advice that they are delivering, the local authority should satisfy itself that this Quality Standard represents sufficient quality assurance; or

c) if the provider does not hold any Quality Standard appropriate to the type of advice that they are delivering, the local authority should undertake their own quality assurance check through the commissioning and review process that the provider is competent to deliver type 3, 4 or 5 advice services. The local authority could consider as part of their check that the service meets the quality areas set out in the Information and Advice Quality Framework Wales; namely, that the service:

- is well-managed
- is well planned
- is accessible, caring and safe
- follows appropriate written policies and procedures relating to their information and advice provision
- is provided by competent staff
- is delivered bilingually
- measures appropriate outcomes

2.10.5 It is for the local authority to decide the appropriate mechanisms to assure themselves and make the judgement that the provider is competent to deliver the type of advice service they are funded for.

Financial Conduct Authority (FCA)

2.10.6 Providing independent budgeting and debt counselling support is an integral part of the HSG. The FCA requires that any firm or individual that provides debt counselling to consumers must be authorised by the FCA. (Local Authorities are exempt and do not need permission to carry out debt counselling services).

2.10.7 It is the responsibility of the provider providing budgeting and debt counselling support to check with the FCA if they are required to be registered with the FCA, as it depends on the level of counselling advice being provided.

2.10.8 It is the responsibility of the local authority to assure themselves, through the commissioning process, that the provider has made the necessary checks with the FCA and is registered if required.

Chapter 3: The Wider Housing Support Grant Environment

3.1 Relevant legislation

3.1.1 There are a number of pieces of legislation which define the environment in which the Housing Support Grant (HSG) is delivered and which need to be taken into account in delivering the Grant. Activity funded through the Grant should take into account and, where relevant, support effective delivery of the:

- Housing (Wales) Act 2014[3]
- Well-Being of Future Generations (Wales) Act 2015
- Renting Homes (Wales) Act 2016[4]
- Social Services and Well-being (Wales) Act 2014
- Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015 (VAWDASV (Wales) Act 2015)
- Equality Act 2010
- Welsh Language (Wales) Measure 2011, and the Welsh Language Standards Regulations
- UK General Data Protection Regulation

3.1.2 As a condition of the HSG, local authorities must have regard to both the statutory and non-statutory guidance provided within the current Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness 2016 and any subsequent versions.

3.1.3 In line with the expectations of Welsh Government; HSG funded services alongside allocations policy, housing management policy, the use of housing registers, and evictions should be co-ordinated to getting people into the rights homes, in the right place with the right support to succeed.

3.2 Housing Support National Advisory Board

3.2.1 The Housing Support National Advisory Board will provide advice to the Minister on policy development in relation to the Homelessness Prevention and Housing Support sector, and how the sector views the effectiveness of homelessness prevention related grant funding in delivering against their objectives.

3.2.2 The Board has been developed from the Supporting People National Advisory Board (SPNAB) and the Homelessness Ministerial Advisory Task and Finish Group. The new Advisory Board does not inherit the scrutiny or grant governance responsibilities of SPNAB. Therefore there will be no reporting requirements to the Board from local authorities or the Regional Housing Support Collaborative Groups. However, we expect the Board to maintain a good understanding of how the Housing Support Programme is being delivered and can be improved.

3.2.3 The Membership of the Board includes representation from across the supported housing and homelessness sector together with key partners.

3.3 Housing Support Network

3.3.1 The work of the Housing Support Network (previously the SPIN and Homelessness Networks) is supported by the Welsh Government. Its main purpose is to enable local

authorities in developing and implementing effective responses to homelessness and housing related support as well as supporting the implementation of the HSG to effectively tackle local, regional and national needs and objectives.

3.3.2 The Housing Support Network meets on a regular basis and provides the opportunity for local authority HSG leads to network and share good practice.

3.3.3 Authorities are expected to have a clear approach to developing an understanding of good practice and learn from other authorities. The Network provides one opportunity to meet that purpose.

3.4 Coordinating services to link with wider agendas

3.4.1 To ensure funding is focused, local authorities should ensure services are flexibly commissioned and coordinated to enhance and complement services which sit outside the Programme.

3.4.2 The following are examples of what local authorities should consider when commissioning and coordinating services to ensure they are providing value for money.

Social Services, Health & Well-being

- How do the HSG funded services fit with the way local authorities are developing services to prevent people accessing more costly health and care options?
- How do the HSG services support the housing aspects of the Learning Disability Improving Lives Programme published in June 2018?
- How do the HSG services support the housing aspects of the Together for Mental Health Delivery Plan 2019-2022?
- Are HSG services accessible for those approaching Social Services, mental health, physical health and drug and alcohol services - and are the staff who are undertaking the initial assessments aware of HSG funded services?
- Are HSG services available to all in the community, regardless of their tenure or lack of tenure?
- What are the opportunities for integrated commissioning between HSG, Social Care and Health?

Children and Communities Grant (CCG)

- What HSG related support services can be jointly commissioned with CCG programmes to deliver common outcomes? For example, in relation to services such as family support.

[3] The grant cannot be used for statutory services
[4] The Renting Homes (Wales) Act 2016 has not yet commenced

- How can HSG funded services support people to link to employability programmes?

Violence against Women, Domestic Abuse and Sexual Violence (VAWDASV)

- Are HSG funded services integrated with other VAWDASV services and VAWDASV strategy priorities? E.g. perpetrator programmes.

- Are HSG funded services working in partnership with local authority Housing Options teams to prevent homelessness and part of the wider model for early intervention and prevention of violence against women, domestic abuse and sexual violence wherever possible e.g. through target hardening?

- Are local authorities adopting integrated commissioning principles with wider partners in line with the Welsh Government's VAWDASV Commissioning Guidance to achieve a joined-up and collaborative approach to commissioning effective and consistent services to support victims of VAWDASV?

- The VAWDASV (Wales) Act 2015 has increased our understanding of the scope of the linked issues of violence against women, domestic abuse and sexual violence. In particular, taking that understanding beyond domestic abuse exclusively. Authorities should ensure that their approach is comprehensive in addressing the full range of the issues and meets the varying needs of all survivors of VAWDASV.

Probation and Youth Justice

- What housing and support services can be jointly commissioned with criminal justice agencies (e.g. to support implementation of the Prisoner Pathway)?

- How can HSG funded services support people leaving prison, including young people in the criminal justice system, be supported to re-establish themselves in the community, reduce re-offending and reduce costs?

- How can people, women in particular, leaving secure estate from England and returning to Wales, be supported to re-establish themselves?

Substance Misuse

- How can HSG services contribute towards the Welsh Government's Substance Misuse Strategy, which includes planned action to improve partnership working with housing and homelessness services?

- What links have been established with Substance Misuse Area Planning Boards to identify potential opportunities for joining up services where needed to provide the best support possible to meet the needs of individuals?

Marginalised Groups

- Are Housing Support Grant services accessible to marginalised groups?

- Do you understand the extent to which services are being used by people with protected characteristics?

Chapter 4: Strategic Planning

4.1 Purpose of the strategic planning process

4.1.1 Effective planning is key to the effective commissioning and procurement of Housing Support Grant (HSG) services to ensure the right outcomes are achieved to prevent homelessness, to support the needs of people who use HSG services and to ensure value for money.

4.1.2 The creation of the HSG is an opportunity to produce a rationalised and coherent planning mechanism for the whole housing system as it relates to preventing homelessness and providing the support necessary to ensure people are appropriately housed. This means that there will be a single strategy (called the Housing Support Programme Strategy), which incorporates the local authority's statutory duty to produce a homelessness strategy and the strategic planning requirements for the HSG. Therefore the single strategy for homelessness prevention and support, and the mechanisms to develop the strategy described in this guidance, should be used to inform the entirety of an authority's approach.

4.1.3 As a result, local authorities should plan for HSG services as part of an overall 'Housing Support Programme' that encompasses both the statutory homelessness duty funded through the revenue settlement and non-statutory[5] preventative services funded through the HSG. It is important that plans recognise the dependencies within the whole housing system as well as interactions with other public service delivery in order to develop a comprehensive and holistic response. The strategic planning process set out in this chapter and annex A aims to facilitate this.

4.2 The strategic planning process

Assessing Needs

4.2.1 Local authorities should undertake a comprehensive needs assessment every four years, with a light touch review every two years. This assessment is a statement of what the Authority knows about the needs and future demand for homelessness prevention and housing support services. The statement provides a distinct picture of what is known, but it should be stressed that this picture can be built from evidence of need that has derived from other mechanisms. That is, whilst the statement is unique, the data and analysis that it is derived from need not be. The assessment should encompass the statutory requirement for a homelessness review as well as the full assessment for the HSG. The assessment should be informed by the following data:

- Population needs assessment
- Local authority well-being assessment
- Homelessness statistics and other housing data such as waiting lists.
- Welsh index of multiple deprivation
- Feedback from service users
- Regional VAWDASV needs assessments
- Any relevant research/national publication

[5] Non statutory in this context should be understood to be outside the specific homelessness statutory duties on local authorities under the Housing (Wales) Act 2014

- Outcomes data
- Needs data from providers, gateway panels
- Unmet needs data over the last 12 months from providers, homelessness reviews

4.2.2 Local authorities should produce a 'Statement of Need' based on findings from the needs assessment. The statement should set out the current and future demands, and should include regional needs where the needs are met by the local authority. The statement should also set out how statutory needs identified will be met through the discharge of statutory duties. The format of this statement is for the authority to decide and can be produced collaboratively.

4.2.3 The needs assessment informs the Housing Support Programme Strategy, including the two year mid-point review. The service response to be set out by the authority in its commissioning plan (which is part of the HSG Delivery Plan) should demonstrably respond to the needs identified in this assessment.

Housing Support Programme Strategy

4.2.4 Local authorities should develop a Housing Support Programme (HSP) Strategy every four years, with a mid-point review every two years, which will outline the strategic direction of the local authority for housing support services. This should provide a single strategic view of the local authorities' approach to homelessness prevention and housing support services. As such, it would include both statutory homelessness functions funded through the revenue settlement and non-statutory preventative services funded through the HSG.

4.2.5 Local authorities must ensure the HSP Strategy, as the single strategic document on housing support and homelessness prevention, also satisfies the existing statutory requirements for a homelessness strategy under Part 2 of the Housing (Wales) Act 2014. There is no requirement to produce a separate strategy.

4.2.6 Strategic planning for the HSG should take into account how it can support delivery of the transformational shift required to move to a rapid re-housing approach and the specific guidance to be provided to local authorities in respect of this.

4.2.7 The **minimum** requirements for the information to be included in the HSP Strategy are set out below:

Section headings	**Content**
1. Introduction	Purpose and scope of the Strategy
2. Strategic Priorities	Local housing related support strategic objectives and priorities identified following the HSG needs assessment and homelessness review. Regional housing related support strategic objectives agreed with partners and the RHSCG Homelessness strategy: In line with section 50 of the Housing (Wales) Act 2014, this section should set how the local authority intends to meet the following objectives:

	• The prevention of homelessness. • That suitable accommodation is and will be available for people who are or may become homeless. • That satisfactory support is available for people who are or may become homeless. Homelessness aspects should also include details of transition plan to shift to a rapid re-housing approach
3. Needs Assessment	A summary of how the needs assessment and homelessness review has shaped strategic priorities.
4. Stakeholder engagement	A summary of how evidence and information from people who use HSG and homelessness services and other stakeholders has shaped the strategic priorities. This should also refer to the Well-being of Future Generations (Wales) Act 2015 five ways of working. Explain what mechanisms were used. How the authority is working with key partners such as health, care and criminal justice in order to optimise the impact of the strategy.
5. Impact Assessments	To at least include: Equality Impact Assessment - A summary of an EIA undertaken of impact of strategic priorities identified on each equality strand Welsh Language Assessment - Identify actions required to deliver the range and level of services needed in line with the Welsh Language Standards requirements placed on the Local Authority. Children's Rights Impact Assessment (CRIA) - Being aware that HSG does not directly support children, but many of the households supported will include children and therefore it may be appropriate to conduct this assessment.

4.2.8 The HSP Strategy can be developed at a local level by one local authority or between two or more local authorities to develop a combined local strategy. This Strategy encompasses the entirety of the delivery of HSG funded services in all localities. To note that this is different to the 'Regional Statement' to be produced by the Regional Housing Support Collaborative Groups. The Regional Statement addresses the four categories of regional co-operation set out in Chapter 5. These are distinct from the purpose of the HSG Strategy.

4.2.9 The draft HSP Strategy should be submitted to Welsh Government for comment prior to local approval and finalisation of the Strategy. .

4.2.10 The final HSP Strategy must be published on the local authority's website.

HSG Delivery Plan

4.2.11 Local authorities should develop an annual local HSG Delivery Plan which should set out how they intend to deliver the priorities identified in the HSP Strategy through the HSG, including spending and commissioning intentions.

4.2.12 The HSG Delivery Plan should include the following information:

Section headings	**Content**
1. Introduction	Purpose and scope of the Plan
2. Delivery Priorities	Setting out how the local authority will deliver the HSG priorities identified in the HSP Strategy for the year. (This should also include any regional projects or joint projects with other local authorities).
3. Stakeholder engagement	A summary of how evidence and information from people who use HSG services and other stakeholders has shaped the delivery priorities for the year. This should also refer to the Well-being of Future Generations (Wales) Act 2015 five ways of working. Explain what mechanisms where used. How the authority is working with key partners such as health, care and criminal justice in order to optimise the impact of the Delivery Plan
4. Local Commissioning Plan	Detailing an overview of recommendations for commissioning, remodeling and decommissioning for the following financial year.
5. Local Spend Plan	Setting out HSG spending intentions for the year
6. Equalities Impact Assessment	Any service changes defined by each equality strand
Annex A: Homelessness Statutory duties	A summary of how the LA will be delivering its homelessness statutory duties

The HSG funding submission

4.2.13 Local authorities should submit the following elements from their HSG Delivery Plans to Welsh Government by the 31 January each year for approval (no separate document is required)

- Summary of how they will deliver their key strategic objectives for the year
- Local Spend Plan
- Narrative on any variances above 10% compared to previous year
- Evidence of how they have collaborated/engaged in developing their HSP Strategy/ HSG Delivery Plan
- Separate annex on delivery of homelessness statutory duties

Consultation and engagement

4.2.14 Local authorities are responsible for developing their HSP Strategy and HSG Delivery Plan. In the process they must consult and engage with the following stakeholders. This engagement must be undertaken in line with the duties set out in the Well-being of Future Generations (Wales) Act 2015 and the 5 Ways of Working.

- Health
- Social Services
- Probation
- VAWDASV Partnership Boards
- Substance Misuse Area Planning Boards
- Children and Communities Grant
- Providers
- Landlords
- People who use HSG services
- Carers and families of people who use HSG services

4.2.15 How this is achieved and what mechanisms are used is the decision of the local authority, but approaches could include setting up a planning group or holding an annual stakeholder engagement event. Evidence of how the local authority has engaged must be set out in their HSP Strategy and HSG Delivery Plan.

Principles of engagement with support providers and landlords

4.2.16 When local authorities are engaging with providers and landlords, they should consider the following principles:

- The purpose of engagement is to gather evidence that informs strategy
- Authorities must be accountable for the way in which they have conducted engagement
- All stakeholders, including providers are recognised for their knowledge and expertise
- Engagement is conducted in the spirit of partnership and cooperation
- Engagement is meaningful and clearly influences decisions
- There should be opportunities to engage in different ways throughout the process
- Engagement process should ensure that providers are given enough information, notice and time to engage meaningfully

- Engagement takes place before and during development of the Strategy and Delivery Plan

Publishing requirements

4.2.17 Local authorities must publish their HSP Needs Assessment and Statement, HSP Strategy and HSG Delivery Plan on their website.

Chapter 5: Regional working/ landscape

5.1 Regional Structure

5.1.1 Regional working forms an important part of improving service delivery. Local authorities must work with neighbouring authorities to form Regional Housing Support Collaborative Groups (RHSCGs) co-terminus with Health Boards[6]. RHSCGs do not play a governance role within HSG instead their role is to provide a forum for collaborative working. Individual authorities are not accountable to RHSCGs. However, authorities will be expected to demonstrate how they have engaged with RHSCGs and how their own plans reflect collaborative approaches with other authorities and with public service partners.

5.1.2 There may be circumstances where a local authority will want to work collaboratively with another local authority outside their defined regional structure, which they are able to do so. However this would be in addition to the requirement for local authorities to participate in their own RHSCG and regional discussions. It is essential that local authorities consider their strategic impact on the same footprint as Local Health Boards even where there are additional collaborative structures.

5.1.3 Regional Partnership Boards (RPBs) provide the mechanism through which collaborative working, between Health, Social Care and Housing can be developed. They are therefore the right mechanism for RHSCGs to build a close working relationship with so that services can be jointly commissioned, designed or focused to optimise the complementary purposes of supported Housing, Health and Social Care. RPBs are continuing to develop their role, structures and approach to securing better outcomes through collaboration. This means that we are operating in an evolving and dynamic environment and the ways of working with RPBs will need to be developed over time. The arrangements set out here are therefore intended to be flexible and capable of evolving to reflect the development of RPBs.

5.1.4 As Welsh Government supports the development of RPBs we will ensure that guidance, resources and assistance facilitates an increasingly close and structured engagement with RHSCGs and the Housing Support agenda. In the meantime RHSCGs will be expected to work alongside RPBs as closely as possible and should establish a relationship with the Housing Representatives on RPBs. In doing so they should seek to inform the conversation regarding collaborative working, identifying options to better integrate services. Where possible this should take the form of integrating the RHSCG, as defined in this guidance, with the appropriate RPB structures.

5.1.5 The Collaborative Groups belong to the Local Authorities who make them up and their accountability is to them as a collective. Regional working should provide a forum for local authorities to deliver those things which are best done regionally. These can be categorised as;

- (Cat) 1: Development of specialist services for which there is not a critical mass locally
- (Cat) 2: Development of regional services where justified by economies of scale
- (Cat) 3: Delivery of improvements to be achieved by collaboration

[6] A single RHSCG will be formed to cover Mid and West Wales covering both Powys Teaching Health Board and Hywel Dda University Health Board areas.

- (Cat) 4: Collaboration with other public services.

5.1.6 RHSCG's should submit an annual regional statement by end of April each year setting out the collaborative working that has been achieved and the key opportunities and challenges that will be the group's priorities through the next year. They should also submit a six monthly position update setting out how they are progressing in delivering against their priorities in their Annual Statement.

5.1.7 Local authorities are expected to fully engage with RHSCGs and, with the support of Regional Development Co-ordinators, secure the co-operation of appropriate partners. The membership of the RHSCG, as a minimum, should include;

- Local authority strategic leads for the housing support grant
- Probation representative
- Police and Crime Commissioner representative
- Support providers and landlords. The support of Community Housing Cymru and Cymorth Cymru should be sought in arranging appropriate representation.
- Substance Misuse Area Planning Board representative
- VAWDASV Regional Partnership Board representative
- Service user voice
- Private rented sector representative
- Children and Communities Grant representative.

5.1.8 RHSCG's should also consider how to engage with representatives from the other relevant sectors such as youth justice and mental health, and consider involving them when needed to inform the agenda.

5.1.9 Elected members appropriately exercise political control over the process and this can be facilitated through the RPB mechanism. However the contribution that elected members can make may be broader and there may be times when the RHSCG may wish to invite elected members to discuss particular issues.

5.2 Role of the Regional Development Co-ordinators

5.2.1 Regional Development Co-ordinators (RDCs) will support the administration of the RHSCG but the fundamental purpose of the RDC will be to facilitate collaborative service provision by bringing together partners to identify and respond to opportunities to improve outcomes through collaboration. RDCs will be directed by RHSCGs and be accountable to the Welsh Government.

5.2.2 RDCs will be expected to liaise with and work closely with other Regional and Local Partnership co-ordinators, in particular Regional Partnership Board and Public Service Board co-ordinators to ensure strategic alignment and the sharing of information.

5.2.3 RDCs should use the opportunity to attend Housing Support Network meetings to be able to share good practice and have an understanding of emerging issues and any lessons learnt for local authorities which may impact on regional working.

Chapter 6: Involving people who use Housing Support Grant Support Services

6.1 The involvement of people who use support services

6.1.1 There is an expectation that people who use Housing Support Grant (HSG) services will be at the heart of all aspects of the Housing Support Programme, from planning, commissioning and procurement through to shaping services. In order to achieve this, a range of methods should be developed by commissioners and providers to ensure people who use Housing Support services, and who would like further opportunity for their voice to be heard, can do so and they will receive feedback on the impact of their involvement.

6.1.2 When involving people who use services, local authorities and providers must ensure that there is a clear voice for all services users, including under represented and marginalised groups.

6.1.3 Local authorities and providers should communicate with service users using a medium or language appropriate to the individual's circumstances. In particular, due regard should be given to local authorities' duties under the Welsh Language Standards Regulations.

6.2 Local authority role in involving people who use support services

6.2.1 Each local authority should as a minimum:

- evidence to the Welsh Government the impact on services from the involvement of people who use HSG services in their local annual delivery plan;
- ensure that the experience of those who are using HSG services contributes to project development and service improvements agreed within the HSP Strategy and local annual HSG Delivery Plan;
- ensure that input from people who use HSG services is incorporated into the development of service specifications and into commissioning, re-modelling and decommissioning services, so any unintended consequences can be recognised and considered;
- ensure contracts for services include the need for providers to include people who use HSG services in service development, monitoring and evaluation. In addition, the involvement of people who use HSG services should also be expanded to all aspects of services including, but not limited to, staff recruitment; and
- demonstrate how they have involved people who use HSG services in the development of services, commissioning, monitoring, and evaluation.
- Feed back to people who have engaged about how they have influenced service planning, development, commissioning and evaluation.

6.3 Provider role in involving people who use support services

6.3.1 Local authorities should ensure contracts for services include the need for providers to include people who use HSG services in service development, monitoring and evaluation. It is recommended that this should include, but not be limited, to providers ensuring that people who use HSG services:

- have opportunities to become involved in services, whether formally or informally, and are provided with a variety of ways to do so whether on an ongoing or ad-hoc basis;
- are involved in all aspects of services and are able to shape services, including such things as staff recruitment;
- are provided with appropriate support to access training to allow them to feel confident about participating;
- are supported to work with local authorities on commissioning, re-modelling and decommissioning; and
- are provided with feedback on the results of their involvement.

6.4 Principles for engagement with service users

6.4.1 Local authorities and providers should pay due regard to the following principles when engaging with service users:

- Local authorities and providers should actively attempt to engage with all voices
- People who use services are treated with respect and recognised for their knowledge and expertise
- Effective advocacy is provided for people who need support to have their voices heard
- Engagement is meaningful and clearly influences decisions
- There should be opportunities to engage in different ways throughout the process
- Engagement process should ensure that providers are given enough information, notice and time to ensure that people who use their services are able to engage meaningfully
- Engagement takes place in good time to influence decisions

6.5 Well-being of Future Generations Act 2015

6.5.1 The Well-being of Future Generations (Wales) Act 2015 ("The Act") provides the basis for driving a different kind of public service in Wales, with five ways of working (long-term, prevention, integration, collaboration, and involvement) to shape how public services should work to deliver for people.

6.5.2 The Act requires public bodies by law to do what they do in a more sustainable way. It requires them to think more about the long term, work better with people and communities and each other, look to prevent problems and take a more joined-up approach. Public bodies need to make sure that when making their decisions they take into account the impact they could have on people living their lives in Wales in the future. It expects them to:

- work together better
- involve people reflecting the diversity of our communities
- look to the long term as well as focusing on now
- take action to try and stop problems getting worse - or even stop them happening in the first place.

6.5.3 Local authorities should consider how HSG services can be designed and commissioned to improve the well-being of people. The Future Generations Framework for Service Design tool describes what the five ways of working mean in

practice for service design and can be used by those who design and oversee provision of services to prompt thought, have structured discussions, and make decisions, about new ways of working to ensure services are resilient and seeking to improve the well-being of people now and in the future.

Chapter 7: Commissioning and procurement of Housing Support Grant Services

7.1 Introduction

7.1.1 This chapter sets out the legislative framework and general principles for the commissioning and procurement of Housing Support Grant (HSG) services. It sets out the parameters in which commissioning of HSG services should operate within an overview of the principles of good practice when commissioning services.

7.1.2 Whilst the focus of this part of the guidance is the promotion and development of effective commissioning and procurement practice, it is important to emphasise that commissioning drives procurement. Service development and the majority of the innovation should take place at the commissioning stage as commissioners should work with stakeholders to design appropriate service solutions to respond to the needs and achieve the required outcomes for people in need of care and support. Once the commissioners have clarified their service requirements they should work with their procurement, legal and other colleagues to design the most effective procurement process to secure these identified services. Local Authority commissioners should make maximum use of the flexibilities introduced by the Public Contracts Regulations 2015, which are still relatively new and offer potential through use of social and employment criteria to deliver our ambitions such as Fair Work objectives.

7.1.3 HSG services will focus on the well-being outcomes that people want to achieve, and on people's rights and responsibilities. Commissioners must consider people's personal well-being outcomes and co-produce solutions with people themselves. The assessment of need will focus on what matters to a person and a person's individual circumstances. Focusing on people's well-being outcomes will drive better experiences and better services for people. In the past some procurement practices have (unintentionally) undermined our ability to deliver personalised, outcomes focussed services provided through a good quality and sustainable workforce. The repeated use of short term contracts, for example, can result in additional costs; discontinuity of service provision; cause stress to those reliant on services together with their carers; generate added stress and bureaucracy for providers who should be focusing on delivering quality services; create workforce instability and add significant costs for commissioners. A modern person centred outcomes approach will require a longer-term contract period and a different approach to contract drafting to support co-production and delivery. Rather than a task and time approach incapable of responding flexibly to the changing day to day needs of individuals; we want to move to an approach where the staff of the commissioner work with individuals to identify the required outcomes and enable providers to exercise greater autonomy to work with them to decide how these outcomes can be achieved. In the future we want commissioners to work with procurement and legal colleagues to design the most effective procurement arrangements that can secure the required well-being outcomes. The Social Partnership Bill proposes a move away from a case by case lowest cost approach to a more strategic approach. We intend HSG commissioning to reflect this broader change.

7.1.4 Local authority commissioners should consider what financial relationship they want with providers, particularly third sector providers. Should this be based on grant or

procurement arrangements? Grants may be an appropriate mechanism for HSG, in particular regarding services previously funded as Homelessness Prevention. Advice has been offered by the National Audit Office on how to distinguish between the circumstances where a grant is appropriate and where procurement would be necessary. You can access this guidance here, https://www.nao.org.uk/successful-commissioning/sourcing-providers.

7.1.5 Good quality commissioning and procurement is key to the provision of quality services which meet the needs of people who use HSG services and provide the best value for public money. Local authorities will need to make commissioning judgements, based on consideration of a range of objectives described in local and regional homelessness, tackling poverty, social care, VAWDASV, community safety strategies and Fair Work.

7.1.6 Commissioning plans must reflect the most appropriate approaches to market development and procurement in their local area, including different contract forms, grants or in-house provision. For example, short term projects in order to test new initiatives could be allocated by HSG teams as a grant.

7.1.7 Local authorities should, as part of their procurement approach, consider innovative and new ways of providing support to allow more efficient use of resources and to better meet the needs of people who use HSG services. For example locality based support, support on demand services, pooling resources between floating and static support, developing regional services and consortia.

7.1.8 Two or more local authorities (within or outside their regional area) may choose to collaborate to jointly commission services where a common priority has been identified and the pooling of resources will deliver better value for money and better meet the needs of people who use HSG services.

7.1.9 Contracts should have explicit and transparent funding arrangements including a shared understanding of funding contributions from rents, welfare payments, Social Care and Health as well as other Welsh Government programmes such as those contained within the Children and Communities Grant (CCG).

7.1.10 It is essential that service provision and service models evolve to reflect the Welsh legislative and policy agenda. Most of the legislation listed at 3.1 highlight the role of prevention in meeting the needs of people within a constrained public funding environment. Commissioning arrangements must be flexible, focus on the greatest impact for people receiving services and a long term preventative agenda.

7.1.11 Local authorities should ensure that they comply with the Welsh language Standards in any procurement exercise.

7.1.12 It's essential that local authorities should maintain a register of services that may be commissioned or procured at short notice should funding become available through slippage or other reasons. These may be new services requiring procurement or expansion of existing services. These plans may not have an established funding source and may not be fully mature, but they are available to be called upon if funding should become available at short notice.

7.2 The legislative framework for procurement

7.2.1 The procurement of social care and housing-related support services is governed by legislation that has been enacted in the UK. The Commercial Policy team have developed procurement guidance for the public sector which can be accessed via the Welsh Government web page. This Guidance is not intended to be a substitute for legal advice or to provide an exhaustive explanation of relevant legislation, and local authorities should seek further advice as appropriate.

7.2.2 The Public Contracts Regulations 2015 (PCR15) set out rules that govern procurement across the public sector in England and Wales for contracts which are above the procurement threshold amounts set out in regulation 5(1) of the PCR 2015. The PCR15 recognise the special characteristics of social services and related services, and the regulations reflect the importance of cultural context and sensitivity. There are specific rules for social, health and other services **(**Light Touch Regime) which if applicable, commissioning bodies may choose to make use of in order to take advantage of the increased flexibility it provides. There are, however, a number of conditions that need to be met. Services caught by the light touch regime can be found listed in Schedule 3 to PCR15.

7.2.3 The National Commissioning Board working in partnership with Social Care Wales have set out a legal overview and good practice guide for the public procurement regime for social care services. The document entitled *Modern, outcome based collaborative procurement: A practical legal guide for commissioners and procurement officers,* sets out the overview of the current procurement law which applies to social care and health and outlines the definitions relating to procurement and a comparison with grants. The guide describes a light touch procurement approach which is particularly applicable to HSG.

Flexibilities

7.2.4 PCR15 provides much greater flexibility for procuring services of this nature.

Award criteria can now include crucial elements to support service delivery (not just price) such as:

- quality, continuity, accessibility, affordability, availability and comprehensiveness of the services;
- the specific needs of different categories of users, including disadvantaged and vulnerable groups; and
- the involvement and empowerment of users; and innovation (Reg 76).

Criteria can be designed to help authorities secure services according to local needs and ensure sustainability of service which is critical:

- Contract performance conditions can include economic, innovation-related, environmental, social or employment-related considerations (Reg 70). Inclusion of such criteria could help take forward the recommendations in Fair Work Wales (2019).

If using the light touch regime:

- Wide discretion to organise the choice of the service providers in the way they consider most appropriate.

- The procurement threshold amount for the light touch regime is set out in regulation 5(1)(d) of the PCR 2015 and is currently £633,540[7]
- In terms of procurements undertaken below the Procurement thresholds referred to above, commissioners should still apply the principles of PCR15, undertaking fair, open and transparent procurement activity. Commissioners should also familiarise themselves with internal organisation procurement standing orders.

7.3 A prudent and preventative approach to commissioning

7.3.1 The commissioning of HSG services should be focused on prevention, but should also align to the basic principles described within the Prudent Healthcare approach.

- Achieve secure housing and well-being with the public, people who use HSG services and professionals as equal partners through co-production.
- Prioritise those at immediate risk of homelessness to make the most effective and proportionate use of all skills and resources.
- Ensure services deliver support as early as possible to prevent people reaching crisis; however recognising the impact of losing one's home.
- Develop and remodel services based on good evidence of best practice in a consistent manner.

7.3.2 To achieve this, consideration should be given to how services are modelled and delivered, and identify how services can evolve and adapt to the changing environment.

7.4 Value for Money

7.4.1 It is necessary to pursue an approach that places the needs of people who require services at the heart of the process and enables them to achieve their outcomes. This must focus on the need to deliver services to as many people who need them as possible to achieve the maximum benefit from the Programme based on a thorough understanding of local needs which will allow a strategic approach balancing breadth of delivery with meeting the needs of those with most complex needs.

7.4.2 It is also crucial to recognise and value the staff who are delivering services within the Programme, often to people experiencing crises and a variety of complex needs. Commissioners and providers should ensure good quality, support, development and terms and conditions for those who are delivering services. The way support staff are valued inevitably impacts upon the quality of support offered.

7.4.3 It is necessary to seek to achieve funding solutions for services which ensure services are targeted at meeting the needs of people at risk of homelessness. This may include the alignment or integration of sectors, funding streams or portfolios, including (but not limited to) housing related support, Housing, Health, Social Care, VAWDASV, Children and Communities, and Tackling Poverty (where appropriate), with the aim of ensuring that the most efficient and effective service is being delivered. This may include jointly contracting and monitoring services.

[7] The next review of the thresholds will be implemented by January 2022 by amendments to the public procurement regulations

7.4.4 Local authorities should recognise there may be legitimate reasons why costs exceed benchmarks in a small number of specialist services. A key component of the approach to be taken is that all stakeholders should have recourse to open discussion around these issues, in the context of discussions on value for money, where it is recognised that commissioners have the final decision.

7.4.5 Key principles to be considered are outlined under 7.3 '*A Prudent and Preventative Approach'.* Broader issues to take into account are:

- Ensure that the people who need services are at the heart of delivery and its focus is on what is of value to them.
- Value for money works both ways – providers need to be able to cover the actual costs of service provision. Local authority commissioners must recognise the importance of full cost recovery and providers should be transparent as to what these costs are and what other income they receive for the scheme.
- Housing-related support services must complement local authority housing advice services. Access to housing-related support services should be through a referral gateway or other mechanisms which are clearly accountable to the local authority.
- Evictions from supported housing settings involve a fundamental tension with the purposes of the grant and our homelessness prevention strategy. Whilst, there may be circumstances where the safety of other residents and staff require the most drastic action they should be the avenue of last resort and only used where no other option exists. The local authority will need to ensure Housing Support settings are subject to accountability and monitoring to ensure any exclusions or evictions do not result in homelessness.
- Encourage innovation to develop more effective and efficient models.
- Where possible develop services that are coordinated to minimise duplication and deliver on shared policy objectives.
- Services should be accountable but stakeholders need to ensure reporting mechanisms are proportionate, taking into consideration contract value, levels of anticipated risk, and intensity of support provided.
- The implications of the Wales Procurement Policy Statement should be considered, with appropriate influence on how services are procured to deliver collective benefit to the community.
- The importance of valuing the workforce which delivers these services is crucial to ensuring the quality of service delivered through both financial and non-financial means. (Consideration should be given to Fair Work Wales (2019), the Code of Practice for Ethical Employment in Supply Chains (2017) and the Community Benefits Guidance (2014)).

7.5 Tendering and re-tendering of HSG Services

Tendering

7.5.1 New services should be subject to normal procurement practice and regulation.

7.5.2 Consideration should be given to using the most appropriate use of contract forms, grants or in house provision according to the services required.

7.5.3 Careful consideration should also be given to the contract length when procuring services, recognising the need for flexibility in contract lengths to deliver sustainable

services whilst balancing value for money. Consideration should also be given to the importance of contract lengths creating a stable environment to recruit and retain staff and to give certainty and consistency to people who use services

7.5.4 Local authorities should ensure that adequate notice is given of new services to ensure that providers have enough time to build partnerships, involve people who use services and ensure that they can develop a high quality bid. Local authorities should also ensure that they communicate with providers during and after this process in a timely manner, in line with publicised timeframes and deadlines.

Re-tendering

7.5.5 A re-tendering exercise should usually only take place in the following circumstances:

a) where a service contract is due to expire; or
b) where a strategic service review has identified that a service is no longer strategically relevant and the service is not able to reconfigure or remodel their service to meet new priorities; or
c) where routine contract monitoring has identified performance issues i.e. where the provider is no longer effective and providing low quality services or where the provider has not complied with contract terms and conditions.

7.5.6 Local authorities should ensure that these circumstances are clearly set out in contract terms and conditions with the provider.

7.5.7 Within the tender arrangements there will be a need for a decision on the process for switching from an old to a new provider. Wherever there is a change of provider, arrangements must be in place to ensure both the provider and the local authority have a robust plan for transferring the service. The local authority should be conscious of the time it takes to set up a new service and transfer staff, where appropriate.

7.5.8 The procurement approach should consider the need to ensure sector stability, the track record of providers in delivering quality services, and the extent to which established relationships between providers and service users contribute to the delivery of outcomes. Before deciding to re-tender a contract, local authorities should consider the following key issues:

- The potential disruption that might be caused for people who use HSG services. Where complex services are being provided, it is reasonable for this to be reflected in the duration of a contract.

- The outcome of consultation with key stakeholders, including people who use HSG services and any implications of re-tendering a contract in relation to related agreements e.g. tenancy agreements.

- The cost and wider workforce implications of TUPE.

- The financial viability of the provider. A local authority should ensure that it liaises with those other local authorities in whose areas such providers are operating, so that they can identify any issues arising.

- Potential cost implications. Local authorities should balance the flexibilities afforded by regular re-tendering with the costs and administrative burdens associated with the process and the time needed for innovation and efficiency improvement under effective provider relationship development.

- Due weight should be placed on continuity of service provision, proven delivery and long-term provider commitment. This should be taken into consideration when evaluating the financial viability of instigating the re-procurement of a service.

- The size and number of contracts within a procurement exercise. A local authority should be mindful of how this could impact on the number and variety of providers operating within their locality.

7.6 Monitoring of contracts and Strategic Reviews

7.6.1 Existing services should be subject to a strategic review every four years. It is important that a transparent and consistent approach to assessing strategic relevance is followed.

7.6.2 A strategic review should take into account the following considerations:

a) The service must be:
- contributing to local and national strategic objectives;
- meeting the requirements and objectives of the service specification; and
- achieving outcomes relevant to the HSG.

b) The support needs of the client group must be eligible for HSG funding.

c).The service must provide housing-related support and demonstrate that the support provided is enabling and focussed on developing a person's independence and future resilience i.e. 'doing with' as distinct from 'doing for'.

d). Evidence of the demand for the service.

e). Feedback from people using services

7.6.3 Local authorities should also ensure that they regularly review and monitor all HSG contracts, at least annually, to ensure compliance with the HSG terms and conditions, using a risk based approach.

7.6.4 Local authorities should consider including provisions within the contract which enable providers to remodel their services during the contract, should a change in local need or new evidence based approaches emerge. This should always be done in partnership and with the agreement of the provider and local authority.

7.7 Decommissioning HSG services

7.7.1 Local authorities will need to make difficult decisions in reconfiguring services to ensure they have the right balance of services to focus on homelessness prevention and address the changing funding environment. Strategic priorities along with efficiency savings will need to be considered and agreed to deliver an effective HSG

programme. Risk management strategies will need to be put in place to manage the possibility of funding reductions along with comprehensive Equality Impact Assessments to manage the process and minimise the risk to those receiving services and to those delivering services.

7.7.2 Local authorities need to make reductions strategically with all stakeholders including but not limited to: Housing, Probation, Health, Social Services, VAWDASV and service providers.

Decommissioning process

7.7.3 The decommissioning of housing-related support services funded through the HSG must be undertaken as a result of a clear and transparent process that is well managed to minimise risk and which takes in to account the views of stakeholders.

7.7.4 Any proposal to decommission should be clearly evidenced. Decommissioning should only be approved following a strategic relevance assessment. An equalities impact assessment must be part of the decision making process to manage and minimise the risk to those receiving services. Where appropriate an exit strategy should be developed.

7.7.5 The local authority should consider evidence from, and the views of, people who use HSG services.

7.7.6 There may be circumstances where a provider decides to stop delivery of a service or is unable to continue to deliver the service. Within the context of the procurement rules, in this circumstance the local authority should ensure the continuity of service delivery whilst meeting all the requirements of the procurement guidance.

7.7.7 The final decision to decommission a HSG funded service lies with the local authority, applying its own internal approval and assurance process.

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7.7.8 Once a decision has been made to decommission a service, formal notice will follow contractual requirements. Where a support provider has given notice on a contract to the local authority this too will follow contractual requirements.

7.7.9 Once the support provider has been given contract end notification, the local authority will work with the provider to notify people who use HSG services of the decision. This process must take account of the vulnerability and support needs of people who use HSG services which will inform a risk management plan.

7.7.10 The local authority should ensure that relevant stakeholders are involved as soon as strategic decisions have been made and are communicated with regularly and appropriately. The local authority should give adequate notice to reduce the negative impact on the provider and people who use services.

7.8 Charging for HSG services

7.8.1 Charging for HSG services is a decision for local authorities. The guidance below outlines which legislation local authorities might wish to use should they opt to charge for services. Local authorities should take into consideration the costs for collection against the income generated when charging for services. Local authorities must

take their own legal advice in order to ensure that they are able to charge for HSG services.

7.8.2 Legislation

1. *Housing Act 1985 - Section 11A (Provision of Welfare Services)*

In summary, in relation to housing provided by the local authority, section 11A of the Housing Act 1985 provides that a local housing authority may provide welfare services for promoting the welfare of the persons for whom the accommodation is provided by the authority. The local authority may make reasonable charges for these welfare services. Welfare services do not include the repair, maintenance, supervision or management of houses or other property.

2. *Local Government Act 2000 - Sections 2 (Promotion of well-being) and 3 (Limits on power to promote well-being) and section 93 of the Local Government Act 2003 (Power to charge for discretionary services)*

Section 2 of the Local Government Act 2000 provides that every local authority in Wales are to have power to do anything which they consider is likely to achieve any one or more of the following objects - the promotion or improvement of the economic, social and environmental well-being of their area. Section 3 provides limits on a local authority on the power to promote well-being.

Statutory guidance has been issued by the Welsh Government recently on the exercise of these powers. (https://gov.wales/sites/default/files/publications/2019-06/power-to-promote-well-being-guidance-for-local-authorities.pdf).

Section 93 of the Local Government Act 2003 provides that a relevant authority may charge a person for providing a service to that person, if the authority is authorised, but not required, by an enactment to provide the service, and the person has agreed to its provision.

Chapter 8: Budget allocations, monitoring, reporting and financial management of the Housing Support Grant

8.1 Budget allocations

8.1.1 The draft budget is usually agreed by Welsh Government by the end of September of the previous year, this includes the indicative Housing Support Grant (HSG) amount.

8.1.2 Letters notifying indicative HSG allocations for the forthcoming financial year will be issued to local authorities by November or when the draft budget has been agreed.

8.1.3 The Welsh Government usually publishes its overall final budget by the end of March of each year. This will include the amount of HSG.

8.1.4 Local authorities will submit their HSG submission for funding (see 4.2.12), including their spend plan by the end of January each year.

8.1.5 Subject to approval of their submission, local authorities will receive a HSG offer letter during March of each year for commencement of the grant in April. The offer will take the form of a Grant Award letter for the following financial year beginning in April.

8.2 HSG grant spend, monitoring and reporting process

HSG funding submission

8.2.1 As set out in Chapter 4, the annual HSG Delivery Plan includes information on how the authority intends to deliver its HSP Strategy during the year. It includes its strategic priorities, commissioning plan, the spend plan, evidence of engagement with stakeholders and users and sets out in a separate annex how the authority will deliver its homelessness statutory duties.

8.2.2 The HSG Delivery Plan forms the basis of the HSG submission for funding of the authority, which requires approval by Welsh Government. Approval will be based on a credible plan and clear evidence of stakeholder engagement and involvement including service users.

8.2.3 The following elements from the HSG Delivery Plan should be included as part of the submission:

- Summary of the local HSG priorities
- Local Spend plan
- Evidence of stakeholder engagement and involvement, including service users.
- Narrative on any variances above 10% compared to previous year
- Separate annex on delivery of homelessness statutory duties

8.2.4 Local authorities should use the template provided by Welsh Government for this purpose and must be submitted to the Welsh Government by the 31 January. The local authority's own approval mechanisms should be applied prior to sending to Welsh Government.

8.2.5 Local authorities will be able to exercise the necessary programme management control through the selection of HSG services that balance regional and local priorities, needs and deliverability.

HSG Reporting

8.2.6 Local authorities will be required to provide six monthly updates on spend/ underspend against the plan, with an additional report by exception on any further underspend/overspend in quarter 3.

8.2.7 Local authorities will also be required to provide a six month and end of year narrative progress update report on delivery of their HSG Delivery Plan.

8.2.8 Local authorities will submit their final outturn expenditure statement by mid-April to Welsh Government. Expenditure monitoring throughout the year will be an integral component of the local authority programme management role.

8.2.9 A payment profile can be found at Annex C. This sets out when payments will be made to local authorities based on receiving the required returns by the dates specified. Where returns are submitted later than the dates specified then this may result in a later payment date to the authority.

Virements with Children and Communities Grant (CCG)

8.2.10 Local authorities can undertake a virement, between HSG and CCG, of up to 5% of the budget resulting from any underspend, subject to approval by the Welsh Government by 30 November of the financial year, with a potential to accept further virement requests in the last quarter of the financial year. The Funding Alignment Team will issue formal guidance on Virements.

8.2.11 Welsh Government will monitor local authority compliance via the grant terms and conditions and the Annual Audit Certificate. Local authorities should ensure they have the necessary checks and controls in place to ensure Provider compliance.

8.3 Management charges

8.3.1 Local authorities should fund the core management costs of a provider. Management charges should be reasonable and consistent with maintaining sustainable services. They should also be based on actual costs as far as can be reasonably ascertained and calculated. As a rule of thumb management charges should not be greater than 10% of the grant to a provider. However, the cap should operate on the principle of 'comply or explain'. Where providers exceed the cap they will be required to provide full information breakdowns of relevant expenditure with associated explanations of why they amount to an overall level higher than the cap, and the actions they have taken to reduce expenditure.

8.3.2 In their budget and financial reporting all providers and local authorities should distinguish between:

- Front line delivery costs (mainly consisting of relevant salary costs but potentially involving other costs as well depending on the project).

- Overhead costs associated directly with delivery ('other running costs' including items such as printing, transport, travel and subsistence, training of front line staff, etc.).
- Indirect and central overhead costs (management charges).

8.3.3 Management charges usually cover the costs (or portion of the costs) associated with central operation/organisation of the Provider which are necessary for the provision of the service (corporate costs). These may include a fair proportion of:

- Central management and governance costs, including direct and indirect overhead such as training and support services.
- Back office support services such as Human Resources, Finance, Legal and Communications.
- Depending on the provider and project elements such as procurement, facilities, audit, IT, insurance, quality control and assurance, publicity and marketing, policy development and public affairs, health and safety and administration and records.

8.4 Individual roles in the delivery and financial management of the HSG

The role of local authorities

8.4.1 Effective delivery and management of the HSG will be the responsibility of local authorities through:

- Partnership with stakeholders, including service users, developing robust local strategies to identify needs and priorities.
- Partnering with stakeholders including regional local authority partners, through the Housing Support Regional Collaborative Group, to create a regional statement identifying regionally delivered services and opportunities for service improvement through regional collaboration.
- Ensuring there is a four year Housing Support Programme (HSP) Strategy in place which sets out the strategic direction and objectives of the local authority in delivering homelessness and housing related support services.
- Ensuring there is an annual HSG Delivery Plan in place which sets out how the local authority intends to deliver the HSG priorities identified in the HSP Strategy for the year through the HSG grant.
- Ensuring that there is a Local Commissioning Plan in place, as part of the HSG Delivery Plan, detailing an overview of recommendations for commissioning, remodeling and decommissioning for the following financial year.
- Ensuring its funding submission, including a Spend Plan, is submitted to the Welsh Government by the 31 January each year.
- Bringing forward effective, person centred HSG services which help create independence and meet local as well as regional strategic needs and aims.
- Ensuring quality services are being delivered, provide value for money, reasonable full cost recovery based on the Welsh Government Third Sector Scheme and comply with grant guidance and terms and conditions.
- Managing the commissioning and procurement of services in accordance with relevant legal requirements, the Authorities' Contract Procurement Rules and having regard to *the Commissioning and Procurement* section of this Guidance and any other relevant guidance.

- Prioritising schemes on the basis of established and transparent criteria, including carrying out Equality Impact Assessments on all funding decisions.
- Selection of service providers for schemes based on transparent criteria and monitoring service delivery costs.
- Management of the outturns for the Programme.
- Completion of the Welsh Government Audit Certificate in accordance with the Grant Terms and Conditions for that financial year, which should be submitted to the Welsh Government by 30 September each year, certifying the expenditure information has been appropriately validated.
- Ensuring that all documentation relating to the HSG funded schemes is available for the Welsh Government if required.
- Ensuring outcomes framework data is collected and submitted to the Welsh Government in the prescribed format where required.
- Using local outcomes data to inform commissioning decisions.
- Ensuring providers have appropriate disclaimers in place to enable client information to be available for research and evaluation purposes.
- Regularly reviewing and monitoring all HSG contracts at least annually to ensure compliance with the HSG terms and conditions, using a risk based approach. This includes the management of voids.
- Carrying out a strategic review of services at least every 4 years to test the relevance of the service and whether they still meet the local or regional needs identified in the HSP Strategy. Where there are shorter contract lengths in place then the strategic review should be brought forward.
- Demonstrating the sharing of good practice and learning from other local authorities to inform continued improvement of delivery of the grant.

The role of Welsh Government

8.4.2 Welsh Government's primary role is to ensure that HSG spend is meeting criteria and purpose of the grant as set out in this guidance. Whilst ensuring compliance is an important part of this role, the intention is to support the delivery of improved outcomes by gathering intelligence about what is working and sharing information about effective practice. Welsh Government expects to achieve more through work to build the strategic capacity of Authorities than 'micro-managing' decisions. As such we welcome information from all stakeholders about how HSG is working but Welsh Government will not intervene in dispute resolution where proper mechanisms exist. For example, complaints or contractual dispute procedures. Welsh Government will be open to issues being raised, either directly or through representative bodies such as Cymorth, in order to build the 'intelligence' necessary to identify areas for improvement. Such issues should be raised with the HSG policy team.

8.4.3 The role of the Welsh Government includes:

- Supporting continuous improvement in the delivery of HSG through guidance, promotion of good practice, and critical friend evaluation of delivery.
- Setting out the strategic framework for the Housing Support Programme.
- Receiving plans/strategies submitted by local authorities for consideration and approval as appropriate.
- Providing indicative budget allocations, subject to appropriate caveats.
- Allocating HSG resources to local authorities taking into account local HSG spend plans. The Welsh Government reserves the right to review allocations to

individual local authorities.

- Administering the payment of grant to local authorities.
- Monitoring the delivery of local authorities against their funding submission. The intention of Welsh Government is to facilitate a constructive dialogue around service improvement, and as part of this process Welsh Government reserve the right to visit local authorities and access relevant documents in relation to the delivery of HSG.
- Reviewing the use of the grant usage by local authorities and providers on an ad-hoc basis.
- Evaluating HSG outcomes submitted by local authorities.
- Holding local authorities to account with regards to meaningful involvement of people with lived experience and service providers, in line with the principles for engagement outlined in Chapter 4 and Chapter 6.

The role of the Provider

8.4.4 The Provider will:

- Develop and deliver services which prevent and alleviate homelessness, support people to maintain their tenancy and help create independence.
- Where appropriate, sign post and link into other services, e.g. health, education, employment, volunteering and training opportunities.
- Demonstrate financial competence and compliance with all relevant financial regulations and requirements.
- Ensure quality services and value for money.
- Comply with all contracted obligations owed to the commissioning body.
- Provide information on costings and income for the project.
- Work in partnership with the local authority.
- Take part in the local authority engagement process, identifying any gaps in services and feeding back.
- Contribute to the local authority strategic planning mechanisms.
- Facilitate service user involvement to inform the improvement of service delivery and the wider Housing Support Programme.

Chapter 9: Evidencing the Impact of the Housing Support Grant

9.1 Outcomes

9.1.1 Following the Ministerial announcement of the move to a two-grant solution, it was agreed that there should be a single integrated outcomes framework (SOF) covering both the Housing Support Grant (HSG) and Children and Communities Grant (CCG), ensuring consistency of approach and outcomes. Work to develop a Single Outcomes Framework (SOF) was anticipated to be completed by April 2020, however, policy development work was paused on it in March 2020 due to COVID-19, whilst partners naturally focused on responsive service delivery in the face of the pandemic. In January 2021, the Welsh Government Funding Alignment Project Board agreed that work on this should continue to be paused. It is also likely that the changes to practice and policy bought forward during the pandemic response will influence this work in the longer term.

9.1.2 Since 2019, whilst the new SOF was being developed, it was agreed that authorities would be required to continue to collect data against the existing Supporting People (SP) outcomes framework, however, authorities have not been required to submit this data to Welsh Government.

9.1.3 Whilst a decision on the SOF is pending and also whilst a separate data review project is undertaken to consider the management data requirements going forward across both the HSG and homelessness prevention, we have reconsidered the collection of outcomes data for HSG. As a result we will be requiring authorities to submit outcomes data for the 2021-22 period. Welsh Government is working with a group of nominated authorities to finalise the data collection and the supporting guidance for this, to be issued by the end March 2021.

9.1.4 This Guidance will be updated once a decision has been made on the Single Outcomes Framework and future outcomes data collection requirements for the HSG.

Annex A: Local Authority HSG planning framework

STEP 1 - 'Statement of Need' (Needs Assessment)
(Every 4 years, with a light touch review every 2 years)
The assessment should encompass the statutory requirement for a homelessness review as well as the full assessment for the HSG

STEP 2 - Housing Support Programme Strategy
(Every 4 years, but reviewed every 2 years)
This is a single strategy, which should incorporates the local authority's statutory duty to produce a homelessness strategy and the strategic planning requirements for the HSG. It should encompass both the statutory homelessness duty funded through the revenue settlement and non-statutory preventative services funded through the HSG.

STEP 3 – Housing Support Grant Delivery Plan (Annually)
Should set out how the local authority intends to deliver the HSG priorities identified in the HSP Strategy for the year through the HSG, including spending and commissioning intentions. This should include:

- **Delivery priorities**
- **Local Spend Plan**
- Local Commissioning Plan
- **Narrative on any variances above 10% compared to previous year**
- **Stakeholder Engagement**
- Equalities Impact Assessment
- **Annex on delivery of homelessness statutory duties**

STEP 4 - Submit a HSG Funding Submission (Annually)

The elements highlighted in bold in the HSG Delivery Plan (at step 3) should be submitted to WG to form its funding submission (**no separate document is required to the Delivery Plan**)

ANNEX B: HOUSING SUPPORT GRANT - SCHEDULE OF DOCUMENTS REQUIRED

	Document	Purpose	Frequency	Submission
1	Housing Support Programme Strategy	The HSP should outline the strategic direction of the local authority for housing support services. This would include both statutory homelessness funded through the revenue settlement and preventative services funded through the HSG. The HSP Strategy should incorporate the local authorities existing statutory homelessness strategy, which local authorities are required to have in place under Part 2 of the Housing (Wales) Act 2014.	Every 4 years but reviewed every 2 years First HSP Strategy to be in place by December 2021	The draft Strategy should be submitted to WG for comment prior to local approval and finalisation of the Strategy. The final Strategy must be published on the LA's website.
2	HSG Needs Assessment Statement	The statement should set out the current and future demands for HSG services. The statement should also set out how statutory needs identified will be met through the discharge of statutory duties	Every 4 years with a light touch review every 2 years	Does not need to be submitted to Welsh Government for approval, but must be published on the LA's website.
3	HSG Delivery Plan	The HSG Delivery Plan should set out how the LA intends on delivering the priorities identified in the HSP Strategy through the HSG, including	Annually By December each year	The whole of the HSG Delivery Plan does not need to be submitted to Welsh Government for

		spending and commissioning intentions. It should include a: • Delivery priorities • Spend Plan • Narrative on any variances above 10% compared to previous year • Local Commissioning Plan, • Equality Impact Assessment • Evidence of stakeholder engagement • Annex on delivery of homelessness statutory duties.		approval, however, see below at (4) for which elements of the Delivery Plan should be provided as part of the funding submission. The Plan should be published on the LA's website.
4	HSG Funding submission	The funding submission **should** include the following elements taken from the HSG Delivery Plan (this is **not** a separate document to the Plan) : • Local Spend Plan • Delivery priorities Narrative on any variances above 10% compared to previous year • Evidence of stakeholder engagement • Separate annex on delivery of homelessness statutory duties	Annually	Submit to Welsh Government by 31 January of each year for approval
5	Spend plan updates	To provide an update on spend against the plan	• Quarter 2 – six monthly update on spend/ underspend	Submit to Welsh Government by: Q2 - 14 October

			• Quarter 3 – report by exception on any underspend or overspend • Quarter 4 – Final outturn expenditure statement	Q3 - 13 January of the following financial year Q4 - 13 April of the following financial year
6	Progress Report	To provide a narrative progress update on delivery against the HSG Delivery Plan. WG Template provided.	• Six monthly progress update • End of year progress update	Submit to Welsh Government by: Six monthly - 14 October End of year - 13 April of the following financial year
7	Finance Audit Certificate	Audit Certificate for the previous financial year	Annually	Submit to Welsh Government by 30 September
8	RHSCG Regional Annual Statement	Setting out the collaborative working that has been achieved and the key opportunities and challenges that will be the group's priorities through the next year. A six month position update should also be submitted setting out progress in delivering against the priorities in the annual statement.	Annually (By the Regional Housing Support Collaborative Group /RDC)	Annual statement by 30 April each year Six month update by 30 October each year

Annex C: HSG Payment profile

Claim period	Documents required	Submit by	Payment date
Submission of bid for Funding	HSG funding submission (see guidance at par 4.2.12 inc spend plan and spend profile)	By 31 January	
Quarter 1 claim	• Signed Grant Award Letter	By 30 April	31 July
Quarter 2 claim	• Claim Form • Six monthly update on spend/underspend • Six month narrative progress report for the period April to September. • Audit Certificate for the previous financial year (by 30 September)	By 14 October *	31 October*
Quarter 3 claim	• Claim Form • Update on spend (report by exception on any underspend/overspend)	By 13 January of the following financial year*	31 January*
Quarter 4 claim	• Claim form • Final outturn expenditure statement • End of year progress report.	By 13 April of the following financial year*	30 April *

*This sets out when payments will be made to local authorities based on receiving the required return by the date specified. Where returns are submitted later than the date specified then this may result in a later payment date to the authority.

ANNEX D: Information and Advice Category types

Definitions of Types of Information and Advice

Type One – Information

Describes a service that gives clients the information they need for them to know more, and do more about their situation. It can include providing information about policies, rights and practices, and about local and national services that may be able to offer the client further help. **Responsibility for any further action rests with the client.**

EG, a person asks whether they can get help with their council tax. The service provides them with a leaflet “Help with Council Tax” and details of local advice services, which offer advice on welfare benefits.

Type Two - Guidance

Describes a service that may discuss the advantages and disadvantages of different options **without making specific recommendations**. It may include making and receiving referrals, identifying emergencies and prioritising issues.

EG, a person wants to understand their finance options before choosing a new or used car. The adviser explains the features of various purchasing options but does not recommend a particular finance option or financial service.

Type Three – Advice

Describes services that diagnose a person’s problem and any related matters, identifies options and relevant legislation, and decide how it applies to the person’s specific circumstances, including identifying the implications and consequences of such action and grounds for taking action.

The services delivered will include form filling, providing information on matters relevant to the problem such as advising on next steps and identifying dates by which action must be taken to secure the person’s rights. Advice may be provided on more than one occasion.

EG, a person asks whether they can get financial help with caring for an elderly neighbour. An advisor carries out a benefit check and identify they may be entitled to claim Carers Allowance, depending on their neighbour’s benefits situation. The advisors tells the person to obtain a claim form to protect their potential date of claim and offer details of services who can offer help to them and their neighbour.

Type Four - Advice with casework

Includes all elements of an advice service **and involves taking action on behalf of the client to move the case on**. It could include negotiating on behalf of the client with third parties on the telephone, by letter or face-to-face. **It will involve the advice provider taking responsibility for follow-up work.**

EG, a student is having difficulty in negotiating the return of their damage deposit from a local landlord. An adviser contacts the landlord and explains that they will be supporting the student to recover the maximum value of the deposit. The landlord claims there was damage to the property, which the student later accepts. The adviser negotiates a reasonable deduction for the damage.

Type Five - Specialist casework

Describes services where the adviser, or the service as a whole, undertakes advice and casework at a level where very detailed knowledge of the law and case law is required. Usually this means it is delivered by advisers who have the necessary depth of legal knowledge and expertise to undertake representation for clients through the court or tribunal.

EG, a person has lost a first-tier social security tribunal. An adviser identifies an error of law in the tribunal's decision, and goes on to represent the person before the Upper Tribunal. Their arguments will reference legislation and case law.

ANNEX E: Commissioning and Procurement guidance: Hints and Tips

Hints and Tips for Local Authorities

- When carrying out a full tender exercise consider the use of different Lots within the tender, and stipulate within the tender that one organisation can only apply for a certain number of Lots. This will help to reduce monopolies.

- When setting up new contacts consider the contract length being a longer period of time, with extensions being built into the contract which are subject to performance (e.g. The initial term of the contract will be for a period of 3 years with the option to extend for a further 3 years in multiples not exceeding 12 months). Alternatively, you could include a longer contract period with break clauses linked to regular reviews. A full procurement exercise is not always necessary every 3 years.

- As stated in 7.2.4 the award criteria should take into account crucial elements to support service delivery and the complex nature of the services being provided. Contracts should no longer be based purely on price and have a stronger focus on quality that can be provided to a set budget.

- Consider using grants for short term projects in order to test new initiatives. The allocation of short term grants will encourage more innovation and allow for niche projects to test new ideas and proposals.

- The document *Modern, outcome based collaborative procurement: A practical legal guide for commissioners and procurement officers* sets out a legal overview and good practice guide for the public procurement regime for social care services, and outlines the definitions relating to procurement and a comparison with grants.

Support for the Market

- Free workshop are available to all providers run by Business Wales, including Introduction to Tendering through to Advanced Bid Writing. Signposting. All providers should be encouraged to take up this free training, especially small providers.
  Business Wales Training - Tendering Support - workshops
  https://businesswales.gov.wales/**Procurement**

- The WCVA also provide tailored training for Third Sector organisations:
  https://www.wcva.org.uk/training-and-events

- All local authorities should look to run Premarket engagement events before procurement exercise takes place. If possible allowing enough time for providers to understand the requirements of the project and adequate time for small providers to have the capacity to write an effective bid. Signpost to training courses.

- Following a full procurement exercise, the unsuccessful providers should always be offered a de-brief session to understand why their bid was unsuccessful. Offer constructive feedback on what could have been improved. Providers should find this beneficial in planning for the next contract.

ANNEX F: Funding of Alarm Services

HSG funding

- Alarms can be funded, through HSG, where local authorities take the strategic decision to do so. Provision takes many forms but the fundable elements include the provision and maintenance of the alarm as well as the monitoring of the alarm system. Alarm response services should be seen as separate and requiring their own justification for eligibility based on their purpose. Therefore, a response service offering care provision would not be eligible nor would one providing a Health Service response. On these grounds Telecare which is specifically designed to address a health or social care need (for example in response to Dementia) would not be eligible for HSG funding. However, whilst alarm provision and monitoring can often respond to social care issues such as trips or falls its provision can often be integral to the ability of a tenant to maintain their occupancy of their home in this way it can be characterised as housing support.

- Where hard-wired alarms are provided in social housing settings they are often linked to door entry and other safety systems which are linked to the management of the building and as such may be eligible for support through the welfare system. Where costs are eligible in this way they should be charged through rent and service charges and they should not fall to HSG.

- Alarm provision designed to enable contact with a response service or monitor the well-being of the individual can be funded through HSG. However, in some circumstances it may be impractical for a landlord to separate hard-wired provision for those who have an identified need from the rest of a system. The Authority should consider funding provision across a whole scheme where to do so secures a strategic objective to improve housing outcomes and reduce demand on other public services. (See below)

- Mobile alarm provision is fundable but should be provided in response to an identified need. Authorities should consider tenure neutral approaches to the provision of mobile alarms. ‘Panic alarms’ designed to allow someone to remain in their home when facing an external threat (such as VAWDASV) can be funded.

- Authorities may charge individual users for the provision of an alarm service, having assessed ability to pay. In deciding whether to charge Authorities should consider the administration costs and the implications for landlords, and other tenants, of providing hard-wired systems to tenants who may choose to contest their provision when facing a weekly charge.

Welfare funding

- *Alarms and Housing Benefit:* A service charge is only eligible for Housing Benefit if it is paid as a condition to occupy, is not listed in regulations as ineligible and is not excessive in relation to the service provided. That means where the tenant can choose whether or not to accept and pay for the service offered it is not a condition.

- Except for ineligible items any other charge that is related to the provision of ‘adequate accommodation’ is eligible for Housing Benefit. Consequently, the provision of a security system which is linked to the accommodation e.g. CCTV and door entry systems protecting, or controlling access to the building itself is eligible for Housing Benefit.

- *Alarms and Universal Credit:* Landlords determine which of their services are eligible and notify the tenant of the amount. This is entered into the Universal Credit claim by the tenant or the Department for Works and Pensions. If a service is eligible this means it is included in the eligible rent; however, if the service is excluded this means that Universal Credit cannot be paid towards the item. https://www.gov.uk/government/publications/universal-credit-service-charges-guidance-for-landlords/universal-credit-service-charges-guidance-for-landlords

  Categories **A** to **D** are listed in law as eligible for Universal Credit:-
  - Maintaining the general standard of accommodation **(Category A)**;
  - *External window cleaning on upper floors*
  - General upkeep of communal areas **(Category B)**;
  - *Ongoing maintenance and/or cleaning of communal areas,*
  - *Supply of water fuel or other commodities to communal areas*
  - Basic communal services **(Category C)**; and
  - *Provision of basic communal services* including for example, secure building access (key-cards, keypad door locking mechanism etc.)
  - Accommodation specific charges **(Category D)**
  - *Use of essential items in your own accommodation such as furniture and domestic appliances.*