

## Cardiff Rough Sleeper Strategy 2017 – 2020 List of Consultees

### First Consultation Draft

#### Homelessness Partnership

Huggard  
The Wallich  
Salvation Army  
YMCA  
Solas Cymru  
Gwalia  
Llamau  
Hafod Care  
United Welsh Housing Association  
Cadwyn Housing Association  
Cardiff Community Housing Association

### Second Consultation Draft

#### Homelessness Partnership

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YMCA  
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United Welsh Housing Association  
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Cardiff Community Housing Association

#### Social Care

Adult Services  
Children's Services  
Cardiff Alcohol & Drug Team

#### Health

University Health Board Nursing Services  
University Health Board Mental Health  
Substance Misuse Area Planning Board

#### Supporting People

Regional Collaborative Committee

#### Equalities Groups

Tai Pawb  
Diverse Cymru  
Race Equality First  
C3SC  
Gypsies and Travellers Wales  
Stonewall Cymru

#### Faith Groups

Street Pastors  
Homeless Alliance / Faith groups

#### Probation

National Probation Service  
Community Rehabilitation Company

#### Police

Local Policing Inspector, South Wales Police  
Chief Inspector, South Wales Police

#### Immigration

HMI Wales Immigration Compliance & Enforcement

#### RSLs

Chief Executives and Housing Managers

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Respondent	Comment	Action
<b>The Wallich</b>	Decent comprehensive strategy. Only suggestion would be to add in a time frame for reviewing and updating the strategy in response to the various reviews and monitoring mentioned within it.	Paragraph on action planning and monitoring strengthened (p.5).
<b>United Welsh</b>	<p>Add as an aim the reasons for and profiles of those rough sleeping.</p> <p>Oak House is down as staffed in the day and it is staffed 24 hours.</p>	<p>New aim added 'To work to understand the causes of rough sleeping' (p.5). Research page added which identifies some of the reasons people sleep rough (p.8).</p> <p>Accommodation Options chart simplified, scheme names/details removed (p.22).</p>
<b>Salvation Army</b>	<p>The strategy appears to be missing some essential research elements that would assist in the understanding of why people rough sleep. There is well documented search that shows links between those who sleep rough and adverse childhood experiences, with a view to understand the complexities of this group, with a consideration to the development of trauma informed services.</p> <p>This information could assist us to understand what needs to change in order to reduce rough sleeping. Is it the services, systems and processes? Are the people the strategy set around complex or is our system complex? It could be argued that there is sufficient bed space within Cardiff to offer a different service/support to those presenting needs. If the strategy was inspired or informed by research it could show direction in possible service models &amp; specifications, practice and interventions.</p> <p>The strategy refers to ongoing monitoring. Is there any learning from</p>	<p>Research page added which identifies some of the reasons people sleep rough. Reference made to the findings of 2011 Joseph Rowntree report 'Tackling Homelessness and Exclusion – Understanding Complex Lives'. 'We Will' added to 'consider the findings of relevant research and pilot projects to inform future service provision' (p.8).</p> <p>Paragraph added to Introduction</p>

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<p>this, for example; How many rough sleepers have been evicted or excluded from hostels? How many rough sleepers have entered and exited hostel accommodation multiple times? What are the trends?</p> <p>The strategy makes a reference to "early intervention' can we achieve no first night out as a city if we used our resources in a smarter way? There is a successful model of early intervention worker already established in our service. Could the existing outreach teams be adapted to have this model.</p> <p>The strategy refers to a 'homeless alliance' what do you mean by diverting away from services that encourage dependency. For individuals that offer a complexity that requires time or for a different style of service, for example Housing First??</p> <p>'Vulnerable interventions service', what does the strategy mean by this and does it work?'capturing people more than 3 months' – is this aim at risk of creating more entrenched rough sleepers or a team development/focus?</p> <p>'review of larger hostels' is this a reference to the commissioning time table.</p> <p>The strategy refers to the need for specialist substance misuse support with rough sleepers. The local authority already have this from the Bridge Programme Outreach Worker. However the strategy makes no reference to the bridge programme at all. The bridge</p>	<p>on complex life experiences and multiple exclusions from services (p.5).</p> <p>Text on long term rough sleepers amended to address chaotic lifestyles / complex needs and exclusion from services (p.11).</p> <p>Early intervention is a key aim of the Strategy. 'We Will' added to 'Work towards 'No First Night Out' for those who engage with services' (p.13).</p> <p>There is a need for a more coordinated, joint working response focussed on getting people off the streets. Text re-ordered to clarify (p.15).</p> <p>Text and 'We Will' on Vulnerable Persons Multi-agency Intervention reworded to clarify approach (p.17).</p> <p>Yes.</p> <p>Section on the Bridge Programme added (p.18).</p>
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	<p>programme could support on treatment pathways, training and mental health /substance misuse codependency to inform research.</p> <p>We also trailed a rough sleepers intervention last year with the Under The Roof Pilot, could we take a look at this style of wrap around intervention.</p> <p>The strategy refers to the need for independent living and diversionary activities, the local authority has this already within our service and the award winning skills development team which have been moving towards community based education and diversionary activities and could support this strategy.</p> <p>The strategy makes a clear reference to the Housing First Model, could it be proposed to make a commitment and a move towards full implementation of this model in the community.</p> <p>We are open to considering how the reconnection service could be strengthened to support those moving into PRS and continued support.</p> <p>The strategy does not show any positive imagery and would note the picture of a shed/hut on the indep living page.</p> <p>p8, 2nd column, 2nd paragraph of the strategy refers to the bus going out every night of the week. Is it intended that the Bus go out every night of the week, as currently its 5 days a week.</p>	<p>'We Will' added to 'Consider the findings of relevant research and pilot projects to inform future service provision' (p.8)</p> <p>Noted.</p> <p>Approach to Housing First clarified. 'We Will' amended to 'Further develop independent living solutions utilising the principles of Housing First and investigate the feasibility of adopting the full model' (p.25).</p> <p>Noted.</p> <p>Photograph of shed removed. Positive independent living case study and photograph added (p.28).</p> <p>Text revised to refer to service running Sunday to Thursday evenings every week (p.14).</p>
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<p><b>Hafod Care</b></p>	<p>The strategy is very informative and in depth. There is a piece missing on page 27 in the section we will: is it meant to be:</p> <p>Will look forward to how the working arrangements will evolve to increase services on the ground and the partnership working to provide accommodation and support to access enhanced healthcare services and move on solutions. However the journey does not stop there. Ongoing support services should be in place to complete a persons resettlement.</p>	<p>Noted. We Will text added to 'Look at pathways into existing diversionary activities and develop additional activities as necessary' and 'Explore ways of supporting rough sleepers with their transition into accommodation and eventual independence' (p.27).</p>
<p><b>Cadwyn</b></p>	<p>A good step in the right direction. Just curious about an option being explored, with some success, in other areas – Housing First. Not sure if it should go in the report but would be good for partners to understand the LA position on this. Is it something that has been discounted, not considered yet? Could this be an area for further discussion?</p>	<p>Approach to Housing First clarified. 'We Will' amended to 'Further develop independent living solutions utilising the principles of Housing First and investigate the feasibility of adopting the full model' (p.25).</p>
<p><b>Huggard</b></p>	<p><b>Summary of Comments</b></p> <p><b>Page 5:</b> Introduction This states that the strategy will “outline how those affected by the loss of a job and/ or accommodation, family breakdown and serious health issues can seek advice and homelessness assistance.” This should read “outline how people sleeping rough, often with complex lives and issues, can receive appropriate and accessible support, advice and homelessness assistance.”</p> <p>The strategy also states that it: “identifies what provision is currently available and how it can be improved to deliver a more wraparound service to the most vulnerable in society.” The strategy currently does not do this comprehensively and there is currently a real risk that services will be overlooked and/or duplicated.</p>	<p>Text amended to reflect comment (p.5).</p> <p>More detail on the range of services added under Early Intervention Options (p14, p.17-18). However, it is not possible to specifically reference all provision in this strategic document.</p>

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	<p><b>Page 6:</b> Background There needs to be information here about multiple exclusion homelessness and the complex lives that rough sleepers experience... the majority of entrenched and repeating rough sleepers that are being supported within the city are not homeless because they don't have a roof over their head but because they have repeatedly been unable to sustain or manage accommodation provided.</p> <p>In September 2011 the Joseph Rountree Foundation published a report entitled Tackling Homelessness and Exclusion: Understanding Complex Lives. This study looked at the experiences of people accessing low threshold homelessness services across seven major cities in the UK, including Cardiff. The study looked at the overlap between homelessness and other social issues.</p> <p><b>Page 14:</b> Early Intervention Currently the Huggard centre provides the following services for Rough Sleepers that address the complex needs of rough sleepers and those moving away from rough sleeping (see response for chart).</p> <p><b>Page 12:</b> Beggars There needs to be included information on both diversionary and development activities as well securing income sources through benefit entitlement and addressing substance misuse: Huggard's Day Centre provides a range of support services and diversionary activities throughout the day, every day of the year and these opportunities are used to provide an alternative for homeless people who are engaging in begging during the day.</p>	<p>Text on complex lives / multiple exclusions added to Introduction (p.5) and under Long Term Rough Sleepers (p.11). New section on Complex Needs included (p.16).</p> <p>Findings of this report included in new Research section. 'We Will' included to 'Consider the findings of relevant research and pilot projects to inform future service provision' (p.8).</p> <p>Further detail of the range of services provided by Huggard Day Centre added (p.14).</p> <p>Additional information added, with reference made to Huggard Day Centre (p.29).</p>
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Respondent	Comment	Action
<p><b>Substance Misuse Area Planning Board</b></p>	<p>This is a very thorough, ambitious but realistic programme of work, and should be commended for addressing underlying causes as well as responding to immediate needs.</p> <p><b>Page 16:</b> Case Study</p> <p>As a point of accuracy, the case study reads as follows:</p> <p>TAITH are funded by the University Health Board to offer advice and support to help people make informed decisions regarding their substance use.</p> <p>This should in fact read as follows:</p> <p>TAITH are commissioned by the Substance Misuse Area Planning Board (APB) using Welsh Government grant funding to offer advice and support to help people make informed decisions regarding their substance use.</p>	<p>Text amended to reflect comment (p.16).</p>
<p><b>United Welsh Housing Association</b></p>	<p>In general the strategy is welcomed by United Welsh. It appears comprehensive in recognising rough sleeping as a very complex, multi-faceted issue. We have included some points/asked some questions below which may be of assistance to you in finalising the strategy.</p> <p><b>Page 21:</b> Emergency Accommodation</p> <p>Those new to sleeping rough or sometimes entrenched rough sleepers who won't access hostels at times require an alternative to night shelters and hostels as places of safety, as often it is perceived it is safer to stay on the street than entering a hostel. Provision needs to reflect this need.</p>	<p>Text added referencing some rough sleepers' reluctance to use emergency accommodation. 'We Will' added to 'Gain a better understanding of the issues with</p>

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	<p><b>General:</b> The strategy needs to be clearer that measurable harm minimisation is also an acceptable outcome for individuals on an interim or long-term basis not just exiting the street.</p> <p><b>Page 13:</b> Case management approach How does this dovetail into statutory case management approaches in other social care areas e.g. mental health and substance misuse? There is a danger in not challenging more traditional services that access to current care pathways remains inequitable for homeless people.</p> <p><b>Page 15:</b> Diversionary / Befriending services Developing diversionary/befriending services is welcomed – particularly if it's based on a strengths-based model of support which recognises the fundamental needs of having a meaningful purpose in life and building/maintaining healthy, meaningful personal relationships.</p> <p><b>Page 16:</b> Complex Needs The pathway for people with complex needs - needs to be explicit about how to deal with people with co-morbid substance misuse and mental health issues in crisis. Historically this is where service users and providers have felt exposed to risk – as the solutions are not always 'text-book' or 'neat'. A never-ending debate about the prominence of a mental health need versus the prominence of a substance misuse problem (as a way of gate-keeping from various agencies) often comes to play in these scenarios.</p> <p><b>Page 20:</b> Public Space Protection Orders It is important to balance the personal needs of individuals that are</p>	<p>emergency accommodation, to facilitate people coming off the streets' (p.21).</p> <p>The case study on an entrenched rough sleeper shows this is done currently (p.11).</p> <p>Case management will engage with and link rough sleepers into these services (p.13).</p> <p>Noted.</p> <p>Noted. 'We Will' added to 'Review and improve partnership working between the statutory and voluntary sectors to address complex needs' (p.16).</p> <p>Noted.</p>
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	<p>rough sleeping with the needs of the wider public when deciding how to use Public Space Protection Orders.</p> <p>We are not sure that describing rough sleeping as anti-social behaviour is helpful as it infers that meaningful/realistic choices/alternatives are available to the individual and aligns with the stigma that is associated with homeless people.</p> <p><b>Page 24:</b> Young Persons Gateway Should it be that young people up to 17 years old will be automatically taken to children's services as opposed to 16/17 year olds? Could have 15 year old for example.</p> <p><b>Page 29:</b> Beggars Has there an impact study been carried out on promoting alternative giving options and whether they have an effect on acquisitive crime rates in particular areas?</p> <p><b>General:</b> There needs to be more explicit recognition in the document about the importance of system flow and move on provision to ensure spaces are always available to those in crisis.</p>	<p>Reference to 'rough sleeping' removed from paragraph on Gating Orders (p.20).</p> <p>Text amended from 'young people aged 16-17' to 'young people under 18 years old' (p.24).</p> <p>Reference added to 'diverted giving' campaigns undertaken in England. 'We Wills' amended to include 'raising awareness of services available' (p.29) and 'learning from the experience of other authorities' (p.30).</p> <p>'We Will' amended to 'Use the Single Persons Gateway to monitor usage of emergency provision to <i>encourage move on and</i> inform recommissioning' (p.24).</p>
<p><b>Tai Pawb</b></p>	<p><b>Page 8:</b> Background/Research The strategy states that the 2016 Crisis study 'It's no life at all – Rough Sleepers' experiences of violence and abuse on the streets of England &amp; Wales' reports that 6% of rough sleepers had been sexually assaulted. However, this figure is higher amongst female rough sleepers. Also, female rough sleepers were also more likely to</p>	<p>Noted. The differential impact on women is recognised in the Strategy's Equality Impact Assessment (EIA). 'We Will' added to 'Develop a specialist</p>

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<p>be a victim of violence. This strategy should recognise the gender imbalance in terms of physical violence, intimidation and sexual assault against females.</p> <p><b>Page 10:</b> Client Demographics          Whilst some data is gathered regarding personal information, such as Sex and Race, there was no mention of the other protected characteristics. Mental Health issues, and vulnerability, were mentioned on numerous occasions throughout the report, which reinforces the fact that Disability information should be collected.</p> <p><b>Page 16:</b> Early Intervention Options          It is positive that a specialist pathway is being developed for clients with mental health/substance misuse issues as part of the strategy commitments.</p> <p><b>Page 19:</b> Early Intervention Options          We understand that under Home Office guidance 'Rough sleeping may be a misuse of a right to reside, therefore EEA nationals or their family members encountered sleeping rough may be subject to administrative removal under regulation 23(6)(c) where it is appropriate to do so. A decision to administratively remove an EEA national can be made' (European Economic Area (EEA) administrative removal).</p> <p>Whilst we are fully supportive of the strategy's approach to provide tailored support to rough sleepers to claim appropriate benefits, access employment and accommodation or to voluntarily reconnect them to their country of origin, we are concerned regarding the involvement of homelessness support services. If homelessness services are purely providing support then we would have no concern but if, through the protocol, they are expected to inform Immigration of non-compliance or disengagement with the process then we would not support this.</p>	<p>pathway through services for females at high risk of exploitation' (p.16).</p> <p>Noted. Please see EIA for proposed actions.</p> <p>Noted.</p>
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	<p>Our concerns would be regarding the sharing of personal sensitive data and also the fact that, if homelessness services were seen to be providing information to Immigration, it could undermine their effectiveness in engaging with rough sleepers in the first place.</p> <p><b>Page 21:</b> Accommodation options It wasn't clear whether all the emergency accommodation options were accessible for disabled people. It would be good to state this and, if it is not, state which options are accessible. If there is no accessible emergency accommodation then a strategy commitment should exist to address this.</p> <p><b>Page 23:</b> Accommodation options This page mentions a scheme which delivers care and support to homeless people with substance misuse and/or physical disabilities. The only scheme named is Ty Cornel, which is only for people with alcohol dependencies. Is this the same scheme or a different one to the one mentioned previously?</p> <p><b>Page 24:</b> Accommodation options It is positive that Council's Housing Options Service has a Young Persons Gateway to address their specific needs by assisting them to develop the necessary awareness and skills to manage their own tenancy.</p>	<p>Noted. Wording amended from 'information sharing will take place to <i>facilitate administrative removal by Immigration services</i>' to '...ensure that administrative removal takes place in a safe and planned manner' (p.19).</p> <p>This is addressed in the EIA.</p> <p>Wording amended to clarify the remit of this scheme (p.23).</p> <p>Noted.</p>
<p><b>Cardiff Alcohol and Drug Team</b></p>	<p><b>Page 18:</b> City Centre Social Work Team. This team is part of Adult Social Services. They work with vulnerable, homeless individuals who have social care needs and often complex health needs. A small number of these people have circulated the hostel system for many years and have no identifiable</p>	<p>Wording amended to reflect information provided (p.18).</p>

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	<p>accommodation move-on options. The team engage with service users to support them to navigate systems and access/sustain accommodation when their support needs cannot be met by any other means. We also provide appropriate interventions, dependent on individual need. The team will undertake Assessments under the Social Services and Wellbeing Act Legislation and work intensively with people, establishing tailor made packages of care where appropriate. The team aim to stabilize chaotic individuals by improving health and well-being and work towards achieving positive outcomes wherever possible.</p> <p><b>Page 23:</b> Ty Cornel It would be helpful to clarify that the jointly funded scheme is in partnership with Cardiff Council Adult Social Services Department and that the referral route in to it is via the City Centre Social Work Team. It has been a very positive partnership with only 2 void periods during the 2 years that the project has been open. Also, 4 of the 6 individuals have been resident at Ty Cornel since it opened.</p>	<p>Reference made to Adult Social Services and referral route being via City Centre Social Work Team (p.23).</p>
<p><b>Huggard</b></p>	<p><b>Page 6:</b> Background. The rough sleeper count of 53 is a snapshot not the number of people who have slept rough in the city in 2016. In 2016 Huggard worked with 844 unique individuals who were rough sleeping on the streets of Cardiff when they accessed Huggard's service. In 2015 this figure was 525. This represents a 60% increase in the total numbers of individuals that have slept on the streets over this period.</p> <p><b>Page 14:</b> Huggard Day Centre: This now includes a summary of services and provides some detail of the advocacy and substance misuse service. There are no case studies included for either of these services, nor the development team's work despite them being vital services for rough sleepers in Cardiff. The current description doesn't include the full range of Huggard's services which can mean that the importance of these services to rough</p>	<p>Text clarified to refer to single night counts (p.6).</p> <p>Huggard Roots Project case study added (p.27).</p>

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	<p>sleepers is both overlooked and there may be further duplication of services that are already provided and well used. We would be grateful if these could be included.</p> <p>We also suggested that given the high demand and hugely positive outcomes of the advocacy project in addressing rough sleeping that a commitment be made as follows:  <i>We Will: Ensure that the Advocacy service is resourced and consideration given to extending this service to increase the case management of rough sleepers within the city.</i></p> <p>Our substance misuse service is funded through the Open Access Engagement programme of the University Health Board and the service is the most accessed service in Cardiff for needle exchange services.</p>	<p>There is an existing 'We Will' to 'Review all funding used to support homeless services' (p.24).</p> <p>Noted.</p>
<p><b>Cardiff Third Sector Council</b></p>	<p><b>General:</b>          We welcome the development of a specific local Strategy aimed at enhancing a partnership, joined up to addressing this complex issue. The strategy does not comprehensively document the full range of the work undertaken by the Third Sector in combatting rough sleeping within the city.</p> <p>The Strategy does not recognise the differentiated experiences of those from BME and other groups.</p> <p>It would be useful to understand if there has been discussion with the third sector regarding the priorities; further investment appears</p>	<p>The strategy provides an overview and is not intended to list all available services.</p> <p>This is addressed in the separate EIA - action is planned to improve equalities monitoring. Where a differential impact has been identified for a protected characteristic, this is addressed in the strategy.</p> <p>Additional resources have been made available to the third sector</p>

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	<p>to be focussed around the Council’s own services.</p> <p>The Strategy does not mention threats to services. This is relevant given that many Third Sector organisations are finding resourcing their services difficult, particularly in the picture of the increasing impact of financial austerity and the commissioning of services by the local authority and other public services.</p> <p>The local authority is currently re-commissioning/planning to commission services, including Floating Support, supported housing and hostel accommodation. If the funding is reduced, it risks directly or indirectly reducing provision.</p> <p>Was the third sector involved in the initial development of the strategy taking a collaborative approach to strategic development in the spirit of co-production and effective engagement, rather than being asked to comment on the draft document - which is not the same thing.</p>	<p>to trial new initiatives. We Will added to ‘Offer funding to pilot new and innovative solutions to rough sleeping’ (p.24).</p> <p>Noted.</p> <p>We Will amended to ‘ensure sustainability’ of homeless services (p.24).</p> <p>Prior consultation was undertaken with the Homelessness Partnership. The ‘We Will’ commitments will be converted into a detailed action plan and there will be further consultation on this.</p>
<p><b>The Big Issue</b></p>	<p><b>Page 28:</b> Soup Run / ending dependency</p> <p>There are two points highlighted in this strategy that we felt are key. The first referred to closer partnership working with faith groups, and identified the need for a new approach to divert people away from options which enable them to stay in the situation they are currently in – thus prolonging their experience as homeless, “encourage dependency,” and to “reinforce rough sleeping.” However, a reference in the case study ‘Tony’s Story,’ where he refers to his volunteering with a soup run as ‘giving something back,’ contradicts this message. From experience, we have found that it is essential to</p>	<p>Reference to volunteering with</p>

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<p>be mindful to keep consistent themes throughout, this reinforces messaging and ensures consistency, i.e. do soup runs encourage dependency?</p> <p><b>Page 16: Complex Needs</b> The second key point is in identifying complex needs. In this review, there is a reference to the increase in those presenting with mental health needs as well as coexisting substance misuse related needs. We second this, there has been a notable rise in those presenting to sell The Big Issue with such needs. We have found it very challenging to find useful and ‘quick-to-respond’ mental health agencies to support us with such needs. There are large waiting lists for services and vendors in need are at risk of relapse, abandoning tenancies, or worse, suicide when they wait for support.</p> <p><b>Page 13: Guide for Homeless People</b> On the map issued as a ‘Guide for Homeless People,’ The Big Issue office is now in the wrong place. Our new address is – First Floor, Hastings House, Fitzalan Place, Cardiff, CF24 0BL.</p> <p><b>Page 9: Streetlink</b> Promote Streetlink app, though improving the visibility of the Homeless Outreach Team’s contact details on the website is useful, it’s not necessarily essential. We think a push to promote the Streetlink app may be more beneficial as it is more accessible to most.</p> <p><b>Page 24: Accessing Services</b> We would like to see a thorough investigation/review into why rough sleepers are reluctant to access some of the services available at the Housing Options centre. We would argue that this is not only ‘entrenched’ rough sleepers but also others.</p>	<p>soup run removed from Case Study (p.28).</p> <p>Noted. ‘We Will’ added to ‘Review and improve partnership working between the statutory and voluntary sectors to address complex needs’ (p.16). Agencies can also refer into the Vulnerable Persons Multi-agency Intervention procedures.</p> <p>Map has been updated.</p> <p>Noted. However, as detailed in the strategy, there have been issues with referrals received via Streetlink to date. Direct referrals to Outreach have proved most effective in identifying new rough sleepers.</p> <p>The Wallich are currently consulting with rough sleepers on barriers to accessing services. The outcomes will be considered</p>
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	<p><b>Page 29: Beggars</b></p> <p>The sections in this review on ‘Independent Living’ and ‘Addressing Begging’ are very small compared the rest and come across almost as an afterthought. We feel that the strategy lacks ‘strategy’ in terms of improving these areas, in particularly when ‘addressing begging.’ There is a commitment to providing alternatives for members of the public who want to give to beggars, and a commitment to identify alternative options for those who are begging, but there is no identification of how or what this will look like.</p> <p>We feel that an ‘anti-begging’ or ‘diverted giving’ campaign is essential in tacking public perceptions of begging, though this has to be dealt with very carefully as we have witnessed this done badly elsewhere in the UK. In order for this to be a success, this must be a multi-agency campaign and must have longevity.</p> <p><b>General: Partner Agencies</b></p> <p>We also feel that the strategy lacks a collaborative approach outside of the usual agencies that are already partnered with. We recommend that research or a consultation is needed to identify who the partner agencies are for achieving the desired outcomes and to identify potential alternatives (or additional options) to the usual partners.</p>	<p>and pathways into services reviewed as necessary (p.8). Arrangements for Council Outreach staff to undertake homelessness assessments to be formalised (p.24).</p> <p>The Strategy is intended to give direction of travel – a detailed action plan is to be developed, subject to consultation. Reference added to ‘diverted giving’ campaigns undertaken in England. ‘We Wills’ amended to include ‘raising awareness of services available’ (p.29) and ‘learning from the experience of other authorities’ (p.30).</p> <p>Noted.</p> <p>Noted. A review of partners worked with will be undertaken.</p>
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	<p><b>Summary</b></p> <p>Overall, we agree that the strategy does not read as a very strategic approach to the current situation in Cardiff. It reads more as an overview of the current work being carried out and the services available than a strategy. Many of the commitments are written as ‘continue,’ ‘consider,’ and ‘build on,’ and don’t come across as directive or definitive action points. However, the key points as detailed above are a refreshing inclusion, especially the aim to move away from activities which encourage dependency and reinforce rough sleeping. We feel there is a definite need to improve multi-agency approaches and to review what potential partners are available in achieving the desired outcomes.</p>	<p>The Strategy does recognise the range of good work already being done in this area but it also contains a large number of ambitious new commitments. These will be converted into a detailed action plan and there will be further consultation on this. Partners to be reviewed (as above).</p>
<p><b>The Wallich</b></p>	<p>It is excellent that Cardiff recognises the importance of developing a clear and thought-through strategy which works to provide help for rough sleepers and addresses other associated issues. However, we have a few comments we would like to add which we believe will strengthen the strategy.</p> <p><b>Referencing</b></p> <p>We would recommend that all figures quoted and data used should be correctly sourced and referenced. This will add clarity in several areas and will help the document look more professional – currently this is an issue throughout the document. For example, the bar chart on page 12 doesn’t clearly explain that the blue bars are the recorded number of rough sleepers from the snapshot count and the red bar comes from the two-week information gathering exercise. Neither is it clear that these figures are taken from the 2016 Welsh Government National Count exercise.</p> <p><b>Page 9: Streetlink</b></p> <p>On page 9, it is worth noting that Streetlink is a website as well as an app. More people are likely to use a website than download an app. Also on page 9, to improve the visibility of the Homeless</p>	<p>References added.</p> <p>Text amended to refer to website (p.9).</p>

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	<p>Outreach Team, we would recommend providing the relevant email address on your website rather than the long online form which might be off-putting to many.</p> <p><b>Page 21:</b> Emergency Accommodation Page 21 could be clearer. The second column suggests that rough sleepers can make direct presentations to Ty Tresillian and Huggard. Depending on how this is interpreted, it could be argued that this is factually incorrect; rough sleepers will have to be on the Gateway system, and cannot directly access these services. If the author is referring to rough sleepers who wait to see if there are any available spaces at Ty Tresillian or Huggard in the evening, this should be made clearer.</p> <p><b>Page 25:</b> Housing First You mention Housing First (HF) schemes on page 25. You might be interested to know that we run an HF project in Anglesey which we would be happy to talk to you about if it would help in the development of a HF strategy for Cardiff.</p> <p><b>Page 29:</b> Begging We think it would be wise to get rid of the first paragraph on the section on 'Addressing Begging' (page 29-30). Most buskers, performing artist and mobile stall vendors apply and/or pay the Council in order to have their pitch and you are at risk of offending these groups by categorising them as 'beggars'. It is also not clear what purpose this paragraph serves.</p> <p>The strategy says that the Council will 'provide clear options for members of the public wanting to support rough sleepers, other than giving to beggars', but you don't mention in detail any ways of doing this. There have been a number of diverted Giving Schemes in other cities; it might be worth discussing what was successful or not with them, as a way of looking at the options available.</p>	<p>Outreach e-mail address added to Strategy (p.9) and to be added to Council website.</p> <p>Page reformatted and text revised to clarify access arrangements for emergency provision (p.21).</p> <p>Noted.</p> <p>Paragraph removed (p.29).</p> <p>Reference added to 'diverted giving' campaigns undertaken in England. 'We Wills' amended to include 'raising awareness of services available' (p.29) and 'learning from the experience of</p>
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	<p><b>Staff Training</b> It is unusual that the training of staff is not mentioned in the document. Correctly trained and experienced staff make a massive difference when working with often complex and chaotic rough sleepers, so we feel it is a key part of any strategy dealing with these issues.</p> <p><b>We Will Commitments</b> Making commitments throughout the document is a positive thing. However, many of the commitments are somewhat vague, and how you aim achieve some of them is left unclear. More information about practical methods is needed to make these commitments meaningful.</p> <p><b>General</b> By making the necessary changes to this document at this stage, you should be able to develop a strategy which not only looks good on paper but also delivers results for rough sleepers and the people of Cardiff. We would be very happy to discuss this document with you in more length and help you to bring together a strong and clear strategy.</p>	<p>other authorities' (p.30).</p> <p>The importance of staff training is acknowledged. However, it is not felt necessary to include this in a strategic document.</p> <p>The Strategy is intended to give direction of travel. The 'We Will' commitments will be converted into a detailed action plan and there will be further consultation on this.</p> <p>Noted. Partners will be fully involved in developing the Strategy's action plan.</p>
<p><b>South Wales Police</b></p>	<p>In terms of the Strategy there are no real issues... A few minor points from the document are:</p> <p>Community Payback are referred to in Operation Spruce – they were not any part of the Operation Mistletoe Plans at all and did not engage or take part in any of the plans or works undertaken.</p> <p>Please can you refer to Spruce as an operation which targeted ASB in the City Centre as this was the aim of the Op to capture and deal with ALL types of ASB</p>	<p>Reference to Community Payback removed (p.30).</p> <p>Sentence describing Operation Spruce amended (p.30).</p>

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<b>HMI Wales Immigration Compliance &amp; Enforcement</b>	In relation to the strategy document, it is very comprehensive. It mentions a protocol between LA, Police and IE and I am keen to get this signed off and indeed start some joint working in line with what IE are doing nationally.	Noted.
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